APPENDIX B

SUMMARY OF NEPA PROCESS FOR WMRNP

Appendix B

Summary of NEPA Process for WMRNP

B.1 Notice of Intent

The impact analyses are based on the Applicant's description of their proposed Project, and that description includes, for some

The planning process was initiated by a Notice of Intent (NOI) to prepare a Supplemental Environmental Impact Statement and Proposed Plan Amendment to the 2006 WEMO Plan that was published in the Federal Register on September 13, 2011, and clarified on May 2, 2013. The clarified NOI served as notification of the intent to prepare an EIS as required in 40 CFR 1501.7, as well as of potential amendment to the CDCA Plan. The NOI served to indicate the planning-level vs non-planning level decisions, and to clarify that the plan amendment would be an EIS-level amendment, and requested comments on relevant issues, National Historic Preservation Act (NHPA) (16 U.S.C. 470(f) concerns, and initial planning criteria for the plan amendment.

The NOI indicated that the Proposed Plan Amendment and SEIS would consider the following:

- Amend the Motorized-Vehicle Access (MVA) Element of the CDCA Plan to modify the language regarding the process for designating routes in the West Mojave Planning Area;
- Reconsider other MVA Element land-use-planning level guidance for the West Mojave Planning Area;
- Revisit the route designation process for the West Mojave Planning Area;
- Clarify the West Mojave Planning Area inventory for route designation and analysis;
- Establish a route network in the Planning Area consistent with current guidance and new information;
- Adopt travel management areas (TMAs) to facilitate implementation of the West Mojave route network;
- Provide or modify network-wide and TMA-specific activity-plan level minimization, mitigation, and other implementation strategies for the West Mojave Planning Area; and
- Respond to specific issues related to the US District Court WEMO Summary Judgment and Remedy Orders.

B.2 EIS Scoping

Following the NOI, BLM held two overview public scoping meetings on September 27 and 29, 2011, in Ridgecrest and Barstow, California. As part of the scoping process, the BLM hosted scoping meetings and public workshops for the public and other interested parties to learn about and submit comments on the West Mojave Route Network Project (WMRNP). The BLM advertised the scoping meetings using a variety of outreach materials including the Project website and news releases. The outreach materials provided an overview of the proposed project;

provided meeting locations, dates, and times; explained the purpose of the scoping meetings; identified methods for making comments; and provided contact information for questions regarding the WEMO Project. All materials provided an e-mail address for submitting comments (cawemopa@blm.gov) and a link to the Project website (http://www.blm.gov/ca/st/en/fo/cdd/west_mojave__wemo.html) which contained a comment form and additional project background information.

The BLM held 10 public scoping meetings to initiate the BLM's process for reconsidering motorized vehicle (OHV) route designations in the WEMO Project planning area. The BLM held two overview open house public meetings September 27 and 29, 2011, in Ridgecrest and Barstow, California, and based on scoping comments and feedback from those meetings, followed with eight public travel designation workshops, also held in Ridgecrest and Barstow, in January and February 2012. A total of 299 people, not including BLM staff, attended the scoping meetings and workshops. Prior to the meetings, the BLM posted current maps and additional project information to the Project website for public review. Table 2 of the Scoping Report provides the locations, dates, times, and number of attendees at each scoping meeting.

The issues to be addressed and the areas of controversy surrounding the proposed plan amendment were similar to those identified for the 2006 WEMO Plan Amendment. In the Scoping Report for the 2011 and 2012 meetings, BLM categorized the public comments as follows:

- NEPA process, and requests for maximizing public involvement in the process;
- Effects of the proposed action on livestock grazing;
- Type of route designation process to be used;
- Criterion A of 43 CFR 8342.1 (minimizing damage to air, soil, watershed, vegetation, or other resources of the public lands, and to prevent impairment of wilderness sustainability);
- Criterion B of 43 CFR 8342.1 (minimizing harassment of wildlife or significant disruption of wildlife habitats);
- Criterion C of 43 CFR 8342.1 (minimizing conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or neighboring public lands);
- Criterion D of 43 CFR 8342.1 (prohibiting trails in officially designated wilderness areas or primitive areas);
- Definition of the purpose and need for the route network;
- The range of alternatives to be considered;
- The source of data for the route inventory being evaluated;
- Specific resource impacts, including air quality; biological resources; climate change; and cumulative impacts associated with alternative energy projects, expansion of military bases, and other planning efforts;
- Mitigation and minimization measures to be considered;

- Implementation and administrative actions including route signage, trail monitoring, enforcement, public education, trail enhancements, and other administrative actions; and
- Area and route-specific comments organized by the Travel Management Areas initially identified.

Following the May 2, 2013 publication of a clarified NOI, three additional public workshops were held in January, 2014, in Barstow, Bishop, and Ridgecrest, which targeted tribal communities. The great majority of the scoping issues and comments were related to specific route designations in the Planning Area. One exception was the comment by many users to address the routes in the Ridgecrest and El Paso subregions through a separate route designation process. Many commenters also provided input on the network inventory, the needs that the network serves, and the route designation process. Primary NEPA considerations focused on cumulative effects to resource values, particularly soils and sensitive species, the cumulative effects of grazing, and to potential cumulative loss of recreational access opportunities. Primary user considerations focused on maintaining diverse recreational opportunities, providing access for specific users, including rock-hounders, motorcyclists, scientific and educational activities, and non-OHV users, dealing with conflicts between users, and maintaining commercial and private access needs.

B.3 2015 Draft SEIS

The Notice of Availability of the WMRNP Draft SEIS was published in the Federal Register on March 6, 2015 (FR Vol. 80, No. 44, Pgs. 12194 to 12195). The initial public review period began on March 6, 2015, and continued for 90 days until June 4, 2015. During that period, BLM held public meetings in Ridgecrest on March 31, 2015, in Victorville, on April 2, 2015, in Lone Pine, on April 7, 2015, and on April 15, 2015, in Yucca Valley. BLM received 458 public comment letters, as well as six form letters that were signed by a total of approximately 4,000 individuals, within this comment period.

Based on comments requesting an extension of the public comment period, and the ability to review the Draft SEIS within the context of the DRECP, an additional public comment period was re-opened beginning on September 25, 2015. This additional comment period was open for 120 days, until January 25, 2016. During this period, two additional public meetings were held in Victorville on December 15, 2015, and in Ridgecrest on December 17, 2015. During this comment period, BLM received an additional 286 public comment letters and four form letters that were signed by a total of 74 individuals.

Following each of those public comment periods, BLM sorted and reviewed the public comments. Where appropriate, changes were made in the route designation alternatives, analysis, and/or text of the SEIS. Comments that were not route-specific were organized into categories, and responses were developed to each group of comments. The response–to-comment document is provided in Appendix I of this Draft SEIS. There were approximately 11,900 route-specific comments in which a commenter requested a change to the designation of a route. Where these comments identified a specific route, requested a change in its designation, and provided rationale for the proposed change, they were reviewed by resource staff, and changes to designations were made in the Alternative 4 route network, where appropriate.

B.4 2018 Draft SEIS

The NOA of the revised Draft SEIS was published in the Federal Register on March 16th, 2018 (FR Vol. 83, No. 52, Pgs. 11785 to 11786). The public review period began on March 16, 2018, and continued for 90 days until June 14, 2018. During that period, BLM held public meetings in Victorville on April 17, 2018, in Ridgecrest on April 18, 2018, in Lone Pine on April 24, 2018, and on April 25, 2018, in Joshua Tree. BLM received public comment letters and e-mails from 422 individuals, as well as eight form letters that were signed by a total of approximately 6,500 individuals, within this comment period.

Following this public comment period, BLM sorted and reviewed the public comments. Where appropriate, changes were made in the route designation alternatives, analysis, and/or text of the Final SEIS. Comments that were not route-specific were organized into categories, and responses were developed to each group of comments. The response–to-comment document is provided in Appendix I of this Final SEIS. There were approximately 7,900 route-specific comments in which a commenter requested a change to the designation of a route. Where these comments identified a specific route, requested a change in its designation, and provided rationale for the proposed change, they were reviewed by resource staff, and changes to designations were made in the Alternative 5 route network, where appropriate.

B.5 List of Preparers

Though individuals have primary responsibility for preparing sections of the Proposed Programmatic Agreement and the EIS (Table B-1), the document is an interdisciplinary team effort. In addition, internal review of the document occurs throughout preparation. Specialists at the BLM's Field Office, State Office, and Washington Office reviewed the analysis and supplied information, as well as provided document preparation oversight. Contributions by individual preparers may be subject to revision by other BLM specialists and by management during internal review.

Table B-1. List of Preparers

Name	Primary Responsibility
BLM – Barstow Field Office	
Edy Seehafer	Project Manager
Matt Toedtli	Project Manager
Jeff Childers	Resources Branch Chief
Anthony Chavez	Soil/Water/Air/Range
Jim Shearer	Cultural Resources
Birgit Hoover	Lands & Realty
Chris Otahal	Biological Resources
Shelly Jackson	Field Documentation (GIS)
BLM – Ridgecrest Field Office	
Craig Beck	Assistant Project Manager, Recreation
Glenn Harris	Soil/Water/Air
Jeff Gicklhorn	Range/Biological Resources
Ashley Blythe	Cultural Resources

Table B-1. List of Preparers

Name	Primary Responsibility
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BLM – California State Office	
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AECOM Environment	
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Erika Grace	Project Coordinator
Anne Ferguson	Recreation, Travel, Visual
Melanie Martin	Planning
Brent Read	GIS Analysis
Steve Ensley	GIS Analysis
Bridget Ronayne	Access Database Development
Jim Harvey	Access Database Development
Patti Lorenz	Biological Resources
Sean Wazlaw	Air, Traffic, and Noise
Steve Graber	Socioeconomics and Environmental Justice
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WEST MOJAVE ROUTE NETWORK PROJECT

Scoping Report

U.S. Department of the Interior
Bureau of Land Management

California Desert District Office
22835 Calle San Juan De Los Lagos
Moreno Valley, CA 92553

June 2012

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ACRONYMS AND ABBREVIATIONS

ACEC	Area of Critical Environmental Concern
BLM	Bureau of Land Management
CAPA	Collaborative Access Planning Area
CDCA	California Desert Conservation Area
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
DAC	Desert Advisory Council
EA	Environmental Assessment
EIS	Environmental Impact Statement
FLPMA	Federal Land Policy and Management Act
GIS	Geographic Information System
NEPA	National Environmental Policy Act
NOA	Notice of Availability
NOI	Notice of Intent
OHV	Off-highway Vehicle
ROD	Record of Decision
TMA	Travel Management Area
U.S.	United States
WEMO	West Mojave
WRNPS	West Mojave Route Network Project Subgroup

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1.0 INTRODUCTION

In compliance with the National Environmental Policy Act of 1969 (NEPA), as amended, and the Federal Land Policy and Management Act of 1976 (FLPMA), as amended, the Bureau of Land Management (BLM) California Desert District intends to prepare an Environmental Impact Statement (EIS) to amend the West Mojave (WEMO) Plan and the Motorized Vehicle Access Element of the California Desert Conservation Area (CDCA) Plan (referred to as the WEMO Route Network Project [Project]). This document summarizes the issues identified during the Project's scoping period.

The WEMO Project planning area includes over 3.2 million acres of public lands administered by the BLM, California Desert District, in the western portion of the Mojave Desert in southern California. The area is part of the CDCA, which was created by Congress with the passage of the FLPMA, and is managed according to the 1980 CDCA Plan. The WEMO Project planning area is located northeast of the Los Angeles metropolitan area and covers portions of Los Angeles, Inyo, Kern and San Bernardino Counties (Map 1). The northwestern portion is under the jurisdiction of the BLM's Ridgecrest Field Office, while the BLM's Barstow Field Office administers most of the remainder. The BLM's Needles and Palm Springs Field Offices administer very small acreages within the WEMO Project planning area.

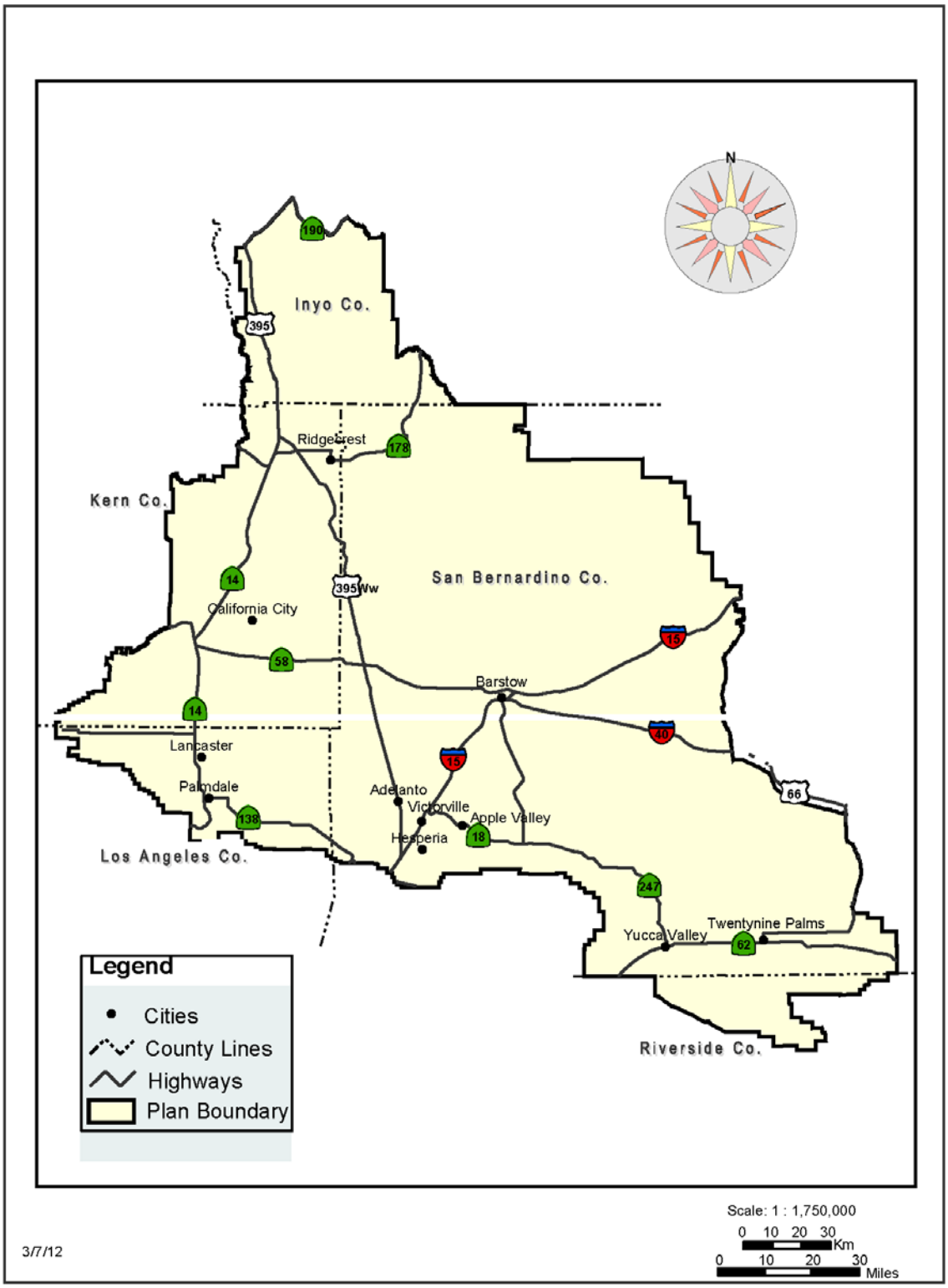
The 1980 CDCA Plan included 12 plan elements for managing over 25 million acres of public land resources and resource uses in southern California, including a Motorized Vehicle Access Element. The Motorized Vehicle Access Element identified management guidelines and objectives for access and vehicular use in the CDCA. Amended numerous times after adopted, BLM approved a comprehensive amendment to the 1980 CDCA Plan in 2006. The 2006 WEMO Record of Decision (ROD) approved the amendment modifying the motorized vehicle management decisions in the WEMO planning area of the CDCA, designating 5,098 miles of motorized vehicle routes without changing the language in the 1980 CDCA Plan. The CDCA Plan contains language that has been judicially determined to restrict motorized routes to those that existed in 1980. A lawsuit challenged the 2006 WEMO ROD's route designation process and in January 2011, the U.S. District Court for the Northern District of California remanded in part the 2006 WEMO ROD to the BLM. The Court directed BLM to amend the CDCA Plan and revise its decision on route designation in the WEMO area by March 13, 2014.

The WEMO Project will look at alternatives for amending the Motorized Vehicle Access Element of the CDCA Plan and alternative processes for route designation in eight Travel Management Areas (TMAs). Updated language in the Motorized Vehicle Access Element will more clearly describe management of motorized vehicle use in the planning area. Ultimately, the BLM will develop an EIS to amend the CDCA Plan and eight travel management plans for each of the TMAs, which will address the travel needs for all resource management programs on BLM-administered land. Table 1 lists the subregions and identifies the general location of the eight TMAs (Map 2) that will be addressed in this effort.

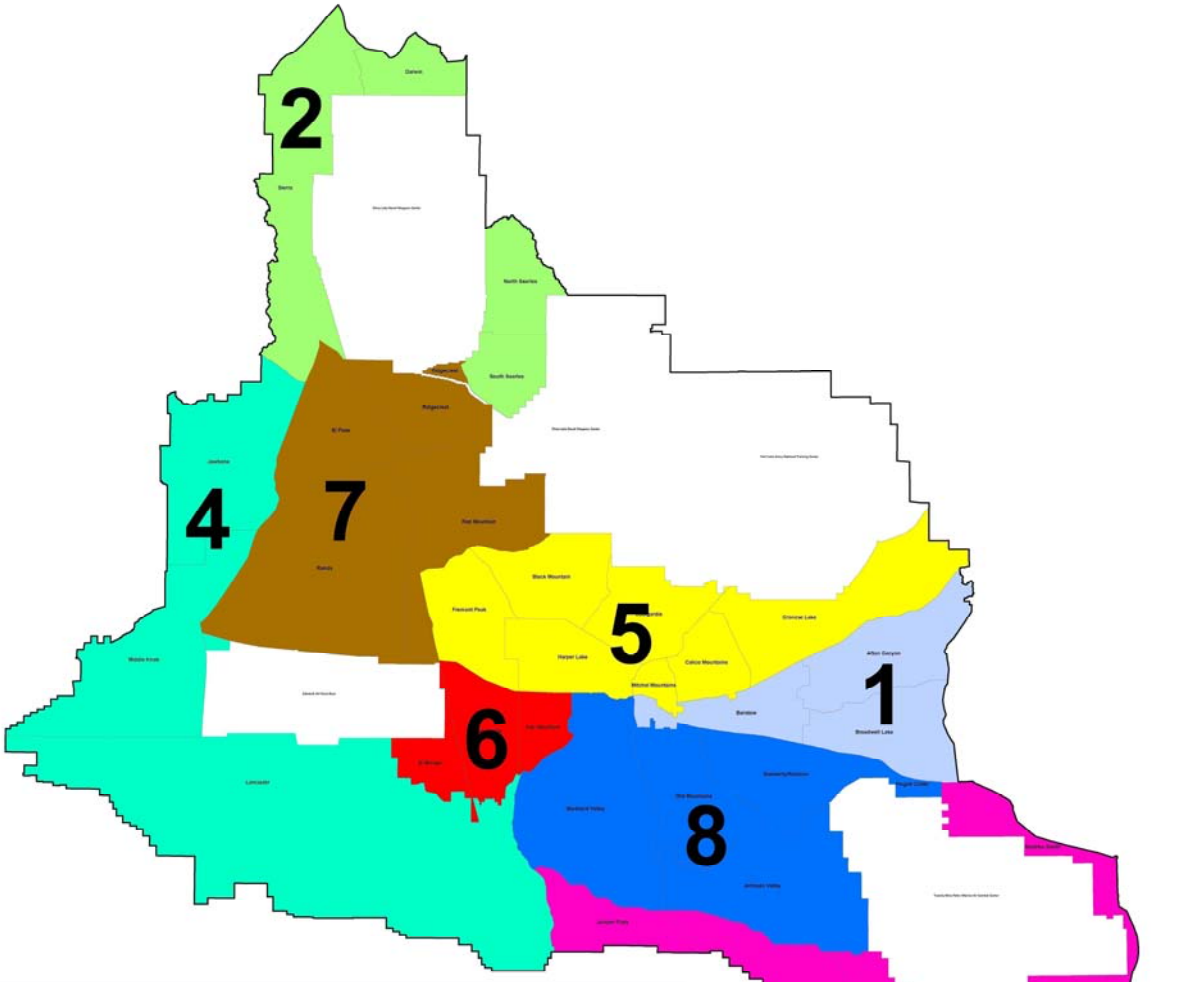
Table 1. West Mojave Project Travel Management Areas

Travel Management Area	Subregions and General Location
1	Broadwell Lake, Afton Canyon, and East of Barstow signing subregions
2	Sierras, Darwin, and North and South Searles signing sub-regions
3	Juniper, Rattlesnake, Morongo, Wonder Valley, and Joshua Tree signing sub-regions
4	Jawbone, Middle Knob and Lancaster signing sub-regions
5	West Mojave North Barstow Desert Wildlife Management Area signing sub-region north of Interstate-15 and State Route 58
6	Mirage (including Edwards Bowl area), Fremont, and Iron Mountain signing sub-regions south of State Route 58
7	Ridgecrest, El Paso, Rands and Red Mountain signing sub-regions
8	Lands adjacent to Stoddard and Johnson Off-highway Vehicle areas, and other signing sub-regions south of Interstate-40 and north of State Route 247 including east of Interstate-15

Map 1. West Mojave Planning Area



Map 2. Travel Management Areas in the West Mojave Planning Area



WEST MOJAVE SUBREGIONS	
1	Between Interstates 15 and 40: Afton, Broadwell, East of Barstow Areas
2	North of Ridgecrest: North Searles, South Searles, Darwin, Sierra Areas
3	South & East of State Route 247: Juniper, Rattlesnake, Joshua Tree, Wonder Valley Areas
4	East Ridgecrest Field Office-Sierra Interface: Jawbone, Middle Knob, Lancaster Areas
5	North of Interstate 15 & State Route 58: North Barstow Desert Wildlife Management Area
6	South of State Route 58 & West of Interstate 15: El Mirage, Kramer Hills, Iron Mtn Areas
7	Central Ridgecrest Field Office: Ridgecrest, El Paso, Red Mountain, Rand Mountains Areas
8	South of Interstate 40 & East of Iinterstate-15: Pisgah, Ords, Newberry and Rodman Mountains, and adjacent to Johnson Valley and Stoddard Valley

1.1 Purpose and Need for the West Mojave Route Network Project

The purpose of the WEMO Project is to amend the WEMO Plan and the Motorized Vehicle Access Element of the CDCA, pursuant to the 2011 Court Order remanding portions of the 2006 WEMO ROD. The WEMO Project EIS will form the framework for route designation in the WEMO Project planning area, consistent with the rest of the WEMO Plan. The plan amendment will address inconsistencies in the language between the CDCA and the WEMO Plan that was one of the subjects of the Court Order. In addition, the BLM is preparing eight travel management plans to designate specific routes in various portions of the WEMO Project planning area and implement the route network.

1.2 Planning Criteria

The BLM identified the following preliminary planning criteria that will help guide the development of the alternatives and NEPA analysis. The planning criteria take into consideration applicable law, regulation, and policy, and will apply throughout the planning process.

- The plan amendment will comply with FLPMA, NEPA, and all other applicable laws, regulations, and policies.
- For program-specific guidance for decisions at the land use planning level, the process will follow the BLM's policies in the Land Use Planning Handbook, H–1601–1 and Manual Section 1626, Travel and Transportation Management.
- Public participation and collaboration will be an integral part of the planning process.
- The BLM will strive to make decisions in the plan compatible with the existing plans and policies of adjacent local, State, and Federal agencies and local American Indian Tribes, as long as the decisions are consistent with the purposes, policies, and programs of Federal law and regulations applicable to public lands.
- The plan amendment will incorporate, where applicable and appropriate, management decisions brought forward from existing planning documents.
- The BLM will work collaboratively with Cooperating Agencies and all other interested groups, agencies, and individuals.
- Geographic Information System (GIS) and metadata information will meet Federal Geographic Data Committee standards, as required by Executive Order 12906. All other applicable BLM data standards will also be followed.
- The planning process will provide for ongoing consultation with American Indian Tribes and strategies for protecting recognized traditional uses, e.g., gathering of traditionally used plant materials.
- The plan amendment will focus on developing language for the WEMO Project planning area that conforms to the goals of the Motorized Vehicle Access Element of the CDCA Plan as described in the 1982 Plan Amendment #3.

2.0 SCOPING PROCESS

Scoping is required under NEPA as defined in Council on Environmental Quality (CEQ) regulations (40 Code of Federal Regulations [CFR] 1500–1508). The BLM NEPA Handbook (H-1790-1) and the BLM Land Use Planning Handbook (H-1601-1) provide additional guidance and direction on scoping as part of the NEPA and planning process.

2.1 Purpose of Public and Agency Scoping

Scoping provides an early and open process for determining the scope of issues an agency will address in a NEPA environmental document. Scoping is the process used to solicit internal and external input and comments on the issues, impacts, and potential alternatives the agency will address in the environmental document and the extent to which the agency will analyze those impacts.

2.2 Scoping Framework and Agency Consultation

In addition to the public input received through the NEPA scoping process described in this scoping report, the BLM is coordinating and receiving input on the WEMO Project from Cooperating Agencies, Tribal governments, and the California Desert District Advisory Council (DAC).

Prior to the start of the scoping period, the BLM mailed 51 Cooperating Agency invitation letters to federal, state, and local agencies identified as having special expertise or jurisdiction by law applicable to the WEMO Project. The letters notified potential Cooperating Agencies of the WEMO Project, provided an overview of the WEMO Project, invited participation as a Cooperating Agency, and provided contact information to submit questions.

The BLM also mailed 16 Tribal consultation letters to potentially affected Tribes formally initiating government-to-government consultation regarding the WEMO Project. The Tribal consultation letters provided an overview of the WEMO Project; requested consultation and invited input; and provided contact information to submit any questions, concerns, or comments on the WEMO Project.

The DAC is a citizen-based Resource Advisory Council that provides recommendations on the management of public lands in the BLM's California Desert District. The DAC operates under a Charter established under Section 309 and Section 601 (g)(1) of the FLPMA, as amended (43 U.S. Code 1739); and all other provisions of the law. In December 2011, in response to the WEMO Project, the DAC established the WEMO Route Network Project Subgroup (WRNPS), which provides input regarding route-specific and network issues pertinent to the WEMO planning area for BLM to consider. The WRNPS is composed of members representing industry, recreation, conservation and the public at large and holds regularly scheduled meetings that are open to the public. The mission of the WRNPS is to prepare a report identifying and providing supporting documentation for a range of alternatives for the eight TMAs in the planning area. The WRNPS is scheduled to submit its final report to the BLM in April 2013.

The BLM will continue to coordinate with the public, Cooperating Agencies, Tribal governments and the DAC throughout the WEMO Project. While this report only considers comments submitted through the formal NEPA scoping process, the Draft EIS will address the input received from all sources.

2.3 Purpose of Scoping Report

This scoping report describes scoping activities for the WEMO Project, summarizes public and agency comments received during scoping, describes the analysis of those comments, summarizes comments by comment category, and provides a preliminary list of issues, concerns, and opportunities for analysis in the EIS. During the EIS preparation, the BLM will consider all substantive issues raised by commenters that are within the scope of BLM decisions.

2.4 Notification and Scoping Meeting Advertisements

The formal scoping process began with publication of the Notice of Intent (NOI) in the *Federal Register* on September 13, 2011 (Appendix A). The original WEMO Project scoping period, as identified in the NOI, ran from September 13, 2011 to October 13, 2011, which the BLM later extended to April 16, 2012. All comments received or postmarked by April 16, 2012 were included in this scoping report. The NOI notified the public of the BLM's intent to prepare an environmental document for the WEMO Project, provided information on the proposed action, described the purpose of the scoping process, and identified methods to provide comments.

As part of the scoping process, the BLM hosted scoping meetings and public workshops for the public and other interested parties to learn about and submit comments on the WEMO Project (see Section 2.5). The BLM advertised the scoping meetings using a variety of outreach materials including the Project website and news releases (Appendix A). The outreach materials provided an overview of the proposed project; provided meeting locations, dates, and times; explained the purpose of the scoping meetings; identified methods for making comments; and provided contact information for questions regarding the WEMO Project. All materials provided an e-mail address for submitting comments (cawemopa@blm.gov) and a link to the Project website (http://www.blm.gov/ca/st/en/fo/cdd/west_mojave__wemo.html) which contained a comment form and additional project background information.

In the scoping announcements, the BLM requested public comments regarding:

1. Issues related to plan decisions which will guide the management of motorized vehicle access in the WEMO Project planning area;
2. Process and decision criteria to be used during plan implementation to designate routes;
3. Issues and concerns within each subregion;
4. Additional issues cited by the January 28, 2011 Court Order including special status species, vegetation communities (including unique plant assemblages), special area designations, air quality, cultural resources, soils, springs and seeps, and Mojave fringe-toed lizard habitat; and,
5. The "bundling of analysis areas" for route designation.

2.5 Scoping Meetings

The BLM held 10 public scoping meetings to initiate the BLM's process for reconsidering motorized vehicle route designations in the WEMO Project planning area. The BLM held two overview open house public meetings September 27 and 29, 2011, in Ridgecrest and Barstow, California, and based on scoping comments and feedback from those meetings, followed with eight public travel designation workshops, also held in Ridgecrest and Barstow, in January and February 2012. A total of 299 people, not including BLM staff, attended the scoping meetings and workshops. Prior to the meetings, the BLM posted WEMO current maps and additional project information to the Project website for public review. Table 2 provides the locations, dates, times, and number of attendees at each scoping meeting.

All public meetings and workshops consisted of a presentation, followed by a facilitated discussion and open-house format where attendees could meet with BLM managers and specialists in an informal setting to ask questions and learn more about the Project. A brief description of the meeting materials and format for the public meetings and travel designation workshops follows. Appendix B includes copies of scoping meeting materials.

Public Meetings

The September 2011 public meetings began with an informational presentation on the designation process and provided examples of how to provide useful feedback to the BLM during the scoping process. These EIS scoping meetings provided the public the opportunity to provide input on planning issues and the route designation process and overall issues. Following the presentation, attendees were encouraged to circulate through each of the five stations around the meeting room that included posters, route network overview maps, and BLM staff available to provide information, answer questions, and gather feedback from attendees on the route designation approach, alternatives, and minimization considerations. The BLM provided handouts of 14 different maps (11”x17”) showing various portions of the currently available and signed route network in the WEMO planning area and posted them on the Project website for examination in more detail. At each meeting, the BLM provided attendees with comment forms and a BLM staff person was available to capture verbal comments.

Travel Designation Workshops

Each of the eight travel designation workshops focused on a particular TMA and provided the public an opportunity to review maps and emphasized providing route- and location-specific comments to the BLM on the focus TMA. The BLM collected additional comments on the overall process as well as other TMAs. The workshops began with a presentation that provided an overview of the route designation process and described the type of general and site-specific information the BLM was looking for from public comments. Each meeting had three to seven stations set up around the room for geographic areas within the TMA that was the focus of that evening’s workshop. Each station, in turn, had three to seven large overview maps and an average of twice as many detailed route network maps showing open and closed routes and other site-specific information. Approximately 100 maps (35 overview maps and 65 detailed route network maps) covering the WEMO planning area were provided at all eight workshops. The BLM provided all maps in large format (33”x44”) for display at the stations and printed several copies of each in smaller format (11”x17”) for handout. The BLM posted maps to the Project website for examination in detail. The BLM provided comment forms to capture general and site-specific comments and transcribed verbal comments at each workshop. In addition, a BLM GIS specialist attended to provide detailed spatial information that is being used to update maps, and capture locational-specific comments.

Table 2. Scoping Meeting Locations

Date	Location	Type	Number of Attendees
September 27, 2011 6:30 p.m. – 9:30 p.m.	Kerr McGee Center 100 W. California Avenue Ridgecrest, California	Public Meeting	40
September 29, 2011 6:30 p.m. – 9:30 p.m.	Hampton Inn 2710 Lenwood Road Barstow, California	Public Meeting	44
January 9, 2012 4:00 p.m. – 7:00 p.m.	Barstow Field Office 2601 Barstow Road Barstow, California	Travel Designation Workshop – Travel Management Area 1	19
January 18, 2012 4:00 p.m. – 7:00 p.m.	Kerr-McGee Building 100 West California Avenue Ridgecrest, California	Travel Designation Workshop – Travel Management Area 2	30
January 26, 2012 4:00 p.m. – 7:00 p.m.	Barstow Field Office 2601 Barstow Road Barstow, California	Travel Designation Workshop – Travel Management Area 3	24
February 6, 2012 4:00 p.m. – 7:00 p.m.	Kerr-McGee Building 100 West California Avenue Ridgecrest, California	Travel Designation Workshop – Travel Management Area 4	44
February 9, 2012 4:00 p.m. – 7:00 p.m.	Barstow Field Office 2601 Barstow Road Barstow, California	Travel Designation Workshop – Travel Management Area 5	16
February 14, 2012 4:00 p.m. – 7:00 p.m.	Barstow Field Office 2601 Barstow Road Barstow, California	Travel Designation Workshop – Travel Management Area 6	7
February 16, 2012 4:00 p.m. – 7:00 p.m.	Kerr-McGee Building 100 West California Avenue Ridgecrest, California	Travel Designation Workshop – Travel Management Area 7	54
February 21, 2012 4:00 p.m. – 7:00 p.m.	Barstow Field Office 2601 Barstow Road Barstow, California	Travel Designation Workshop – Travel Management Area 8	21

3.0 SCOPING COMMENTS

3.1 Comment Document Collection

The BLM received 297 written comment documents collected at public meetings or sent to the BLM via standard mail or e-mail during the scoping period (Table 3). The BLM accepted comments in any written format including verbal comments transcribed during the 10 scoping meetings (see Section 2.5). Of the 297 comments received, 27 were submitted through some variety of form letter. Form letters are standardized and duplicated letters that contain the same text or portions of text and comments. The BLM read all form letters in their entirety and extracted and analyzed any comments unique and supplemental to the form letter; however, the BLM considered comments with the same text as one comment. Section 3.3.1 describes the number of individual comments.

Table 3. Submission Method of Comment Documents

Submission Method	Number of Comment Documents
E-mail	116
Scoping Meeting	127
Standard Mail	54
Total Comment Documents Received During Scoping	**297**

3.2 Comment Document Submissions by Affiliation

Most comment documents were submitted by commenters with no identified affiliation, such as recreation enthusiasts, and other members of the public (Table 4). Interest groups submitted the second greatest number of comments followed by businesses.

Table 4. Number of Comment Documents Received by Affiliation

Commenter Affiliation	Number of Comment Documents
No Affiliation Indicated	201
Business	4
Interest Group	84
State Agency	3
County or City Government	2
Federal Agency	3
Total	**297**

3.3 Comment Summary

The BLM used a multi-step process to catalogue, organize, sort, and summarize comments submitted during scoping. The following nine steps describe how the BLM processed comment documents, identified and bracketed individual comments, and grouped comments into comment categories:

1. Receive and log data for each comment document (e.g., date received, entity, affiliation).
2. Assign each comment document a unique identifier (referred to as a document number) for tracking purposes.
3. Electronically scan the comment document.
4. Review the comment documents and identify (bracket) each individual comment in the comment documents. Many comment documents include multiple individual comments.
5. Code each comment with a comment category (i.e., broad topics used to group comments expressing similar concerns) based on the content of the comment.
6. Enter all individual comments into a sortable spreadsheet with applicable fields, including comment text, comment category, and other relevant information.
7. Sort comments by comment category.
8. Summarize comments by comment category in a narrative form to describe the general questions and concerns submitted during scoping.
9. Develop issue statements to identify questions, concerns, and opportunities submitted during scoping to provide a framework for addressing scoping issues in the EIS.

The BLM categorized all comments into comment categories that reflect common concerns and themes expressed by commenters. Comments submitted on the WEMO Project generally fell into categories of NEPA, livestock grazing, route designation process and issues, and out of scope. Comments regarding route designation were either general (related to the entire route network or multiple routes) or site-specific (associated with a particular TMA). In general, commenters expressed the same issues about specific routes as they expressed about the route network as a whole, and vice versa. Table 5 displays the comment categories identified in this scoping report.

Table 5. Comment Categories

Comment Categories
1. NEPA Process
2. Livestock Grazing
3. Route Designation Process
General and Network Wide Route Designation
4. 43 CFR 8342.1(a) – Route Designation Criterion A
5. 43 CFR 8342.1(b) – Route Designation Criterion B
6. 43 CFR 8342.1(c) – Route Designation Criterion C
7. 43 CFR 8342.1(d) – Route Designation Criterion D
8. Network Purpose and Need
9. Range of Alternatives
10. Data and Route Inventory
11. Analysis and Impacts
12. Mitigation and Minimization
13. Implementation and Administrative Actions
Route-Specific Designation
14. Travel Management Area 1
15. Travel Management Area 2
16. Travel Management Area 3
17. Travel Management Area 4
18. Travel Management Area 5
19. Travel Management Area 6
20. Travel Management Area 7
21. Travel Management Area 8
Out of Scope

CFR Code of Federal Regulations
NEPA National Environmental Policy Act

Categories 4-7 refer to the minimization criteria (43 CFR 8342.1) the BLM must consider during route designation. The 2011 Court Order requires the BLM to reconsider the off-highway vehicle (OHV) route designation for the WEMO Plan that complies with FLPMA and the minimization criteria (43 CFR 8342.1), reproduced below.

All designations shall be based on the protection of the resources of the public lands, the promotion of the safety of all the users of the public lands, and the minimization of conflicts among various uses of the public lands; and in accordance with the following criteria:

> (A) Areas and trails shall be located to minimize damage to soil, watershed, vegetation, air, or other resources of the public lands, and to prevent impairment of wilderness suitability.
>
> (B) Areas and trails shall be located to minimize harassment of wildlife or significant disruption of wildlife habitats. Special attention will be given to protect endangered or threatened species and their habitats.
>
> (C) Areas and trails shall be located to minimize conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or neighboring public lands, and to ensure the compatibility of such uses with existing conditions in populated areas, taking into account noise and other factors.
>
> (D) Areas and trails shall not be located in officially designated wilderness areas or primitive areas. Areas and trails shall be located in natural areas only if the authorized officer determines that off-road vehicle use in such locations will not adversely affect their natural, esthetic, scenic, or other values for which such areas are established. (43 CFR 8342.1)

3.3.1 Comment Submittals by Comment Category

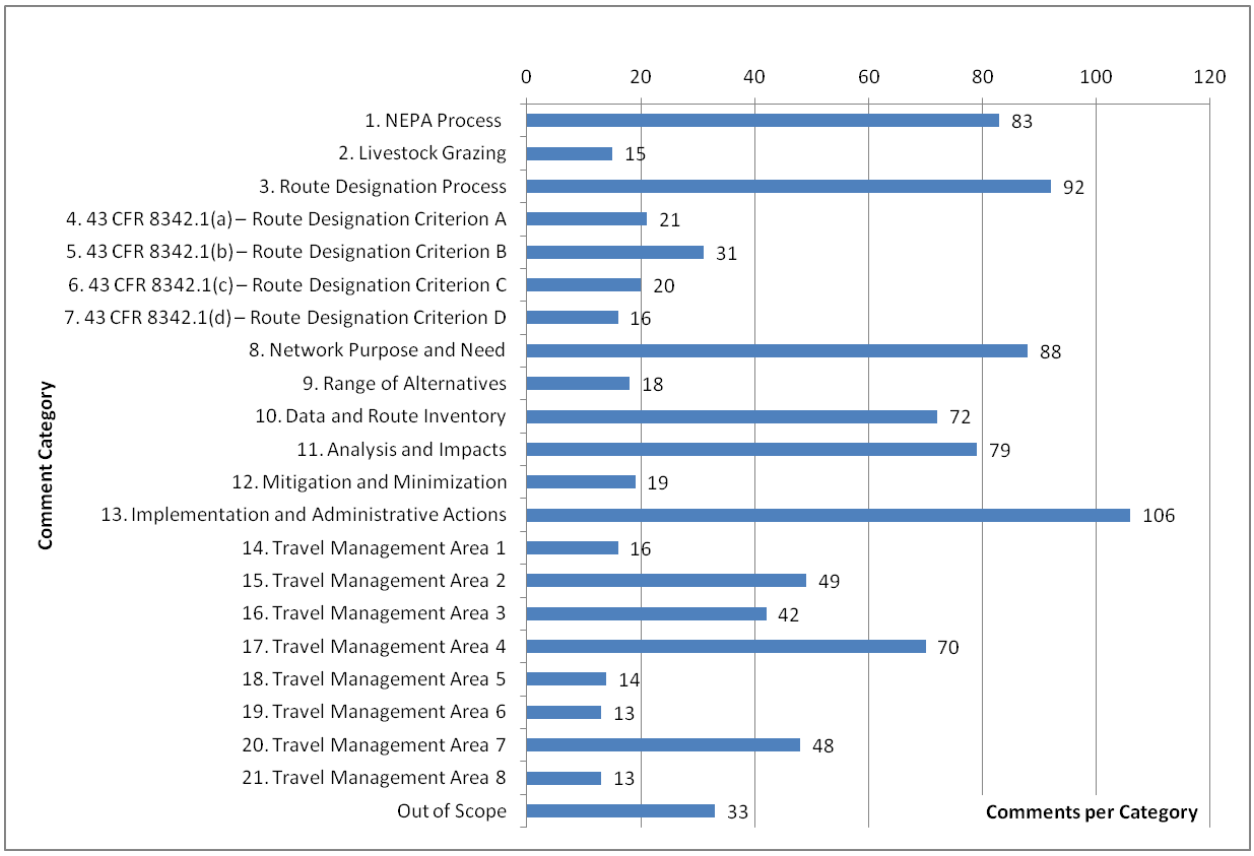
The BLM identified 958 individual scoping comments covering a broad range of comment categories. Table 6 and Figure 1 summarize the number of scoping comments identified by comment category. The greatest number of comments within the scope of the EIS were associated with implementation and administrative actions (106), route designation process (92), network purpose and need (88), and NEPA process (83). Out of scope comments (33) included comment period extension requests, comments regarding need for specific BLM staff, concerns about cost, and other comments that were not within the scope of analysis for the WEMO Project. Appendix C includes all individual comments organized by category.

Table 6. Number of Comments Received by Comment Category

Comment Categories	Number
1. NEPA Process	83
2. Livestock Grazing	15
3. Route Designation Process	92
General and Network Wide Route Designation	
4. 43 CFR 8342.1(a) – Route Designation Criterion A	21
5. 43 CFR 8342.1(b) – Route Designation Criterion B	31
6. 43 CFR 8342.1(c) – Route Designation Criterion C	20
7. 43 CFR 8342.1(d) – Route Designation Criterion D	16
8. Network Purpose and Need	88
9. Range of Alternatives	18
10. Data and Route Inventory	72
11. Analysis and Impacts	79
12. Mitigation and Minimization	19
13. Implementation and Administrative Actions	106
Route-Specific Designation	
14. Travel Management Area 1	16
15. Travel Management Area 2	49
16. Travel Management Area 3	42
17. Travel Management Area 4	70
18. Travel Management Area 5	14
19. Travel Management Area 6	13
20. Travel Management Area 7	48
21. Travel Management Area 8	13
Out of Scope	33
Total Comments Identified	**958**

CFR Code of Federal Regulations
NEPA National Environmental Policy Act

Figure 1. Number of Comments by Comment Category



CFR Code of Federal Regulations
NEPA National Environmental Policy Act

3.3.2 Summary of Comments

This section summarizes comments submitted during scoping that are within the scope of the WEMO Project. The BLM grouped comment summaries into comment categories based on the content of the comment.

Category #1 – National Environmental Policy Act Process

Commenters raised several issues related to the NEPA process, including the type of environmental document to be prepared for the WEMO Project, public participation, and the scoping process. Many commenters noted there was a need to prepare an EIS to adequately address impacts on sensitive resources (e.g., special status species, historic resources, etc.), physical resources (e.g., air quality, soils, water), and cumulative impacts. Other commenters indicated additional stakeholder and agency coordination was needed to ensure consistency with local plans and policies including RS 2477 rights-of-way. Commenters also suggested the BLM more clearly define the scope and proposed actions including the relationship to the previous WEMO Plan.

Commenters emphasized public participation suggesting that the BLM hold regular public meetings during the NEPA and route designation process, allow early and adequate opportunity for public and agency comment, consider all public comments, involve private landowners, and implement a robust stakeholder

process involving a wide range of citizens and interest groups. Some commenters urged caution regarding the voices on the extreme ends of the WEMO Project and asked the BLM to facilitate a safe and harassment-free dialogue.

Commenters also submitted several comments regarding the WEMO Project scoping process. Several commenters expressed concern that the scoping meetings and workshops were flawed and did not meet NEPA scoping guidelines, including inappropriately limiting the scope of what will be accepted and considered as comments. Commenters indicated more site-specific scoping meetings were required for each sub-region given the complexity of issues involved. Some commenters also noted that the scoping meeting announcements, the timing and location of meetings, options for comment submittal, and information presented at the scoping meetings were inadequate and did not meet their needs. Many commenters found fault with the maps and GIS data supplied at the scoping meetings, indicating the maps were of inconsistent and inadequate scale, and did not include important landmarks or road names that would allow the public to make site-specific comments. One commenter requested the BLM refrain from displaying unauthorized routes on public maps as they may encourage unauthorized use.

Category #2 – Livestock Grazing

Comments received on livestock grazing raised issues associated with the analysis of livestock grazing impacts and the need to revise the grazing element of the WEMO Plan. Commenters generally requested the BLM conduct a more thorough analysis of the cumulative impacts of grazing and conduct greater site-specific analyses for each grazing allotment. Specifically, commenters requested the BLM provide a quantitative analysis of the number of routes that cross each grazing allotment and describe the associated issues of compatibility and competing uses in the EIS.

Category #3 – Route Designation Process

Many commenters expressed support or opposition to analyzing motorized vehicle use separately or combined with sub-regional route designation. Commenters fell on both sides of the issue with some commenters supporting the separate approach because of the proximity of the planning area to a large population. Some commenters noted their opposition to the combined approach, and made recommendations for evaluating subregions. Commenters expressed support for using the subregion approach, while others were in favor of the regional approach. Several commenters requested the BLM continue to conduct the route designation process in the Collaborative Access Planning Area (CAPA) (El Paso Mountains and Ridgecrest) as a separate process to allow more time for community participation. Some commenters indicated the court decision did not apply to the lands involved in the CAPA process. One commenter requested the BLM initiate a CAPA process for other areas.

Commenters made several recommendations for the BLM to consider during the route designation process. Some of the suggestions included consideration of regional connectivity, designation of roads already approved (e.g., wilderness boundary roads and cherry stems) or roads easily justified for motorized use, and borrowing from other sources or emulating related processes, such as the California Department of Motor Vehicles Division code (38026.1) which allows for combined use (OHVs and regular vehicles) on highways. Several comments emphasized the importance of key elements of the route designation process including availability of personnel to manage and maintain the route network based on affected resources and management objectives, minimizing vehicle impacts on natural resources, use of aerial photography and GIS, identification of destinations and opportunities, and collaboration with the public and stakeholders. Commenters identified coordination with other land managers, notably the U.S. Forest Service, as an important component of the route designation process. Commenters noted that a

one-size-fits-all approach is not appropriate, noting, for example, decisions applicable to open areas may not apply to limited areas.

Commenters also reminded BLM of the importance of adhering to all state and federal laws and governing land use plans necessary for a cohesive route designation process that minimizes resource impacts but addresses all multiple-use classes. Several comments reiterated the importance of considering the 43 CFR 8342.1 criteria for route designation and suggested they be used consistently.

General and Network Wide Route Designation

Category #4 – 43 CFR 8342.1(a) – Route Designation Criterion A

Criterion A under 43 CFR 8342.1 requires the BLM to minimize damage to air, soil, watershed, vegetation, air, or other resources of the public lands, and to prevent impairment of wilderness suitability.

Commenters emphasized the importance of considering the impacts of route designation on soil, watershed, vegetation, air, visual, cultural, and other resources on public lands. Commenters made the following suggestions or comments:

- Soil – use erosion potential ratings when evaluating vehicle use on routes in certain topographies to minimize damage to soils. Stabilize and rehabilitate closed routes as quickly as possible to minimize soil erosion.
- Watershed – avoid designating motorized routes in riparian areas and remove routes in ephemeral waterways including washes.
- Vegetation – limit motorized use to necessary routes to avoid loss of native plants. Commenters identified several sensitive species (e.g., white-margined beardtongue, Mojave monkey flower, and Lane Mountain milk-vetch) that may be affected by motor vehicle use or related activities in the planning area.
- Air – increased routes could lead to increased pollutant emissions and associated adverse impacts on human health. Commenters expressed concern that if air quality in open areas is not improved recreationists may move to other areas creating unauthorized routes.
- Visual – use the Visual Resource Management program when opening routes and prioritizing closing and rehabilitating routes.
- Cultural – erect gates to limit access to cultural sites but do not eliminate all access.

Generally, commenters emphasized that use limitations and minimization criteria were important to consider when evaluating routes for vehicle use to minimize impacts on resources, other uses, and adjacent lands.

Category #5 – 43 CFR 8342.1(b) – Route Designation Criterion B

Criterion B under 43 CFR 8342.1 requires the BLM to minimize harassment of wildlife or significant disruption of wildlife habitats.

Commenters expressed concerns that motorized vehicle use could affect wildlife, special status species, and their habitat in the planning area. Commenters cited loss of habitat, habitat fragmentation, mortality from collision, and reduced density as concerns associated with route proliferation and suggested analyses and mitigation to address the impacts. One commenter cited the 2011 *Revised Recovery Plan for the Mojave Population of the Desert Tortoise* recovery plan as a source of information regarding direct and

indirect threats from motorized vehicle use to desert tortoises and their habitats including crushing, loss of shelter, deliberate maiming or killing, air pollution, fire, invasive plants, surface disturbance, and toxicants.

Commenters specifically noted motorized vehicle use could impact the following special status species:

- Mojave desert tortoise
- Mojave ground squirrel
- Bendire's thrasher
- Gray vireo
- Le Conte's thrasher
- Mojave fringe-toed lizard
- Nelson's bighorn sheep
- Western pond turtle
- Mojave tui chub

Additionally, commenters suggested using timing restrictions to minimize effects of vehicle use on wildlife; there was a lack of data supporting closing routes to improve wildlife connectivity; and routes (motorized and non-motorized) should avoid riparian areas to minimize wildlife harassment and habitat degradation. One comment supported management actions to protect wildlife habitat and consideration of potential impacts from invasive plants, fire, and global warming on plant and animal distribution in arid lands.

Category #6 – 43 CFR 8342.1(c) – Route Designation Criterion C

Criterion C under 43 CFR 8342.1 requires the BLM to minimize conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or neighboring public lands, and to ensure the compatibility of such uses with existing conditions in populated areas.

Several commenters expressed concern related to conflicts between motorized vehicle use and recreation and the compatibility of such uses with existing conditions in populated areas. Some of the specific concerns raised by commenters included the adverse effects on non-motorized recreation, access, and private property. To address the conflicts with other recreation, commenters recommended designating certain trails for hiking only and suggested motorized and non-motorized activities occur in separate areas to reduce conflicts. The BLM also received comments suggesting limitations on the types of motorized vehicle use including allowing only street legal vehicles to minimize impacts of staging areas.

Commenters raised several concerns related to adverse effects on private property from motorized vehicle use on public lands including noise, air quality, trespass and lack of law enforcement, loss of property values, and effects associated with large OHV events (environmental, property damage, accidents, and clean-up costs). Other commenters recommended eliminating routes at public-private lands interface and posting signs where routes terminate on private property to prevent trespass. Some commenters noted conflicts with routes terminating at state roads, crossing controlled access highways, and use of local roads.

Category #7 – 43 CFR 8342.1(d) – Route Designation Criterion D

Criterion D under 43 CFR 8342.1 prohibits trails to be located in officially designated wilderness areas or primitive areas.

Commenters recommended reducing or eliminating routes near or within wilderness areas, primitive areas, and areas where sensitive resources occur including Areas of Critical Environmental Concern (ACECs), Desert Wildlife Management Areas, Mojave Ground Squirrel Conservation Areas, etc.

Commenters recommended the BLM consider prohibiting motor vehicles, closing existing routes, and closing adjacent routes to prevent access to wilderness areas. Other commenters indicated routes should be allowed to terminate at wilderness area boundaries and one suggested the California Desert Protection Act took precedent over the federal criteria (43 CFR 8342.1[d]) allowing route designation adjacent to wilderness boundaries as well as exempt vehicle access. One commenter requested BLM quantify the number of routes and resource impacts (habitat, species, etc.) in sensitive areas. Another commenter emphasized the importance of using available data or tools with on-the-ground implementation in the route designation process in sensitive areas.

Category #8 – Network Purpose and Need

Comments in this category primarily addressed reasons why commenters supported or did not support aspects of the WEMO route network. Most comments emphasized the importance of route access for seniors and disabled persons, recreation opportunities including motorized and non-motorized activities such as collecting (gems, minerals, fossils, rocks), driving for pleasure, visiting historic sites, wildlife viewing, photography, horseback riding, climbing, biking, camping, mountain biking, and hiking. Commenters also provided reasons why the BLM should not diminish route access.

Many commenters requested the BLM maintain or restore access to areas special to them including "rockhounding" locations, scenic areas, and favorite OHV routes. Commenters also requested access to private property, water sources for livestock and wildlife, and for educational and research purposes including to fossil sites for paleontological study.

Route expansion was also a common theme in many of the submitted comments. Commenters indicated more trails were needed for a variety of reasons including recreation and safety, noting that dispersing users over larger areas would relieve congestion and prevent accidents. Several commenters identified the need for more types of trails such as single track routes for motorcycle or mountain bikes in order to increase the opportunities for different skill levels (e.g., motorcycle trials, technical trails, youth loops) and the range of riding experiences (single track, quad recreation).

Category #9 – Range of Alternatives

Commenters submitted several comments about the range of alternatives the BLM should consider in the WEMO Project. Many commenters requested the range of alternatives include an alternative that maximizes motorized recreation as well as one that minimizes motorized travel to only that needed in a region. Some commenters noted mileage should be limited or reduced to protect sensitive resources or special designations. Comments indicated alternatives should include multiple route designation scenarios with different route designs in each scenario. Other recommended alternatives included converting existing or closed roads to OHV routes; maintaining access to historic sites, dispersed campsites and trailheads; beginner, intermediate and advanced routes for all motorized users; shared use trails; and building new trails, loops and 4X4 challenge routes. One commenter requested the BLM consider an alternative that maximizes the potential for recovery of Threatened and Endangered species.

Several commenters emphasized the importance of no reduction or loss of motorized opportunities and the need for equal quantity and quality of motorized and non-motorized opportunities. One commenter requested more single track routes while another commenter requested motorcycle or single track routes be specifically defined including how they will be maintained and managed.

Category #10 – Data and Route Inventory

Comments in this category primarily addressed the types of data, data sources, references, maps, and route inventory the BLM should consider during the WEMO Project. Commenters requested various sources of information be included in the baseline inventory for evaluation including data and analysis from previous planning efforts, published sources and maps, BLM GIS data on collecting areas (e.g., rocks, gem, minerals and fossils), inventory of water sources (seeps, springs, tinajas, guzzlers, tanks, and wells), previously disturbed sites, vegetation mapping, and wildlife linkage maps and studies. Several comments suggested compiling the baseline network data from 1980 and pre-1980 maps, then comparing this data with current network data. Commenters also identified ground-truthing to be critical to the development of an accurate route inventory. The general theme of the comments was the importance of developing a complete picture of the existing conditions of the WEMO route network.

Commenters recommended compiling the route network and resource data in GIS format for evaluation and suggested data and methodologies for the evaluation. Commenters requested the BLM consider natural resource data, scientific information related to motorized vehicle use impacts, and motorized use statistics including data on accidents and enforcement. Some commenters also requested the BLM gather and analyze data on closed routes in addition to routes currently designated as open.

The need for better maps was a common sentiment expressed by commenters who pointed out numerous inaccuracies, poor labeling, inadequate scale, and lack of detail as some of the problems with the maps of the WEMO route network. Commenters pointed out details such as railroads, populated areas, and campgrounds which were not shown and others which were not labeled. Several commenters noted they knew of routes not shown on the maps or not properly labeled as open or closed. Commenters suggested displaying topographic features, jurisdictional boundaries, water sources, township and range coordinates, and distinguishing between types of routes using different colors (e.g., single track versus two track routes). In addition to improving the maps, commenters requested the BLM make mapping products, including static maps and GIS data, more readily available by posting on the BLM website.

Category #11 – Analysis and Impacts

The BLM received multiple comments regarding the need for analysis, using the best available science, of potential impacts from the route designation process and resulting travel management amendment on other resources and resource uses. Commenters expressed concern or requested analysis regarding impacts to the following:

- Air Quality – analyze air quality impacts from construction and maintenance of roads and off-road routes as well as regional and local air quality impacts.
- Biological Resources – analyze the impacts to BLM sensitive, rare, threatened, and endangered species and their habitats, including desert tortoise.
- Climate Change – analyze impacts to and from climate change on route designation (one commenter disputed the validity of climate change impacts).
- Cumulative – analyze cumulative impacts from past, present and future actions including, but not limited to proposed or anticipated alternative energy projects, military base expansions (U.S. Marine Corps Air Ground Combat Center Twentynine Palms), other planning efforts such as the

Solar Programmatic EIS and Desert Renewable Energy Conservation Plan, and the cumulative impacts of motorized closures.

- Minerals – analyze impacts to mineral resource extraction and associated economic impacts from restricted access.
- Recreation – analyze the effects of route designation on all types of recreation that occur in the planning area, including non-motorized recreation.
- Socioeconomic – analyze impacts from the project on the social and economic conditions of local and regional communities.
- Soil – analyze acreage of land subjected to low, moderate and high vehicle use disturbance in relation to differing erosion rates.
- Special Designations and Other Management Areas – analyze impacts to special designations and other management areas including national parks, wilderness areas, and ACECs.
- Visual – analyze lands subjected to visual resource impacts due to route location on certain topography, or the likelihood of erosion impacts over time.
- Water – analyze impacts to riparian areas, wetlands, springs, seeps, and other water dependent resources.

Commenters also requested the BLM consider a variety of route-specific factors when analyzing each route during the designation process such as if the route is a through-road, the history of the road, and proximity to guzzlers, tank wells, springs, seeps, or tinajas.

Category #12 –Mitigation and Minimization

Comments in this category primarily addressed how the BLM should mitigate for the loss of routes and mitigate or minimize the impacts from motorized vehicle use on other resources. Several commenters recommended the BLM treat the closure of off-road routes, and resulting loss of access to unique locations for recreational opportunities, as an adverse impact that would necessitate mitigation in the form of designating new routes, opening currently closed routes in areas that would receive the least impact from off-road travel or leaving existing routes open to off-road travel. One commenter stated that mitigation for route designation should be the responsibility of the BLM not other stakeholders, and mitigation should not affect other uses. Another commenter requested the BLM mitigate for the loss of off-road access due to renewable energy and military projects. If the loss of off-road routes cannot be mitigated within the planning area, one commenter advised that a Motorized Access and Recreation Mitigation Bank be established to account for the number of miles closed through the WEMO route designation process.

Other commenters requested the BLM mitigate impacts to other resource values from motorized vehicle travel. Commenters emphasized that redundant routes should be identified and evaluated in an effort to minimize the number of open routes. Several commenters reminded the BLM that they must consider the minimization criteria specified in 43 CFR 8342, reiterating that routes designated as open must still minimize impacts to the natural or cultural resources, air and water quality, scenic values, and non-motorized uses of public lands or adjacent and interspersed private lands. For example, a commenter suggested that the total number of routes in high-relief topography be limited.

Category #13 – Implementation and Administrative Actions

The BLM received the most comments within this category which primarily addressed how the BLM should handle implementation-level decisions including route signage, trail monitoring, enforcement, public education, trail enhancements, and other administrative actions. Improving signage was a common refrain

expressed by commenters, although the recommended methods to do so varied. Some commenters requested the BLM sign all routes as open or closed, while other commenters requested signing only closed routes, only open routes, and variations thereof. Commenters also expressed concern about sign vandalism and indicated areas where the BLM should not erect signs for resource protection. Commenters requested the BLM include specific information on signs and kiosks such as route use limitations, explanations for closure or rehabilitation, historical and cultural information, descriptions and significance of riparian areas for wildlife, skill level needed for travel, directional arrows, route numbers, and information regarding penalties associated with non-compliance for off-road travel restrictions.

Several commenters cited the need for a specific monitoring plan within the WEMO Plan to gather information about impacts to routes to better manage and enforce route designations, comply with route restrictions, and implement rehabilitation efforts. Commenters also noted that rehabilitation of closed routes has generally not been successful in keeping OHVs from using the routes and suggested various ways in which the BLM could improve rehabilitation. For example, one commenter proposed that the "Youth in Nature" program could partially fund rehabilitation efforts, while another commenter recommended that prioritizing rehabilitation areas would be a more efficient use of BLM staff and funding.

Commenters recommended addressing enforcement of route designations and restrictions as a way to improve management of off-road use and impacts and provided suggestions for enforcement strategies (e.g., improved collaboration with city and county law enforcement and improved reporting systems). One commenter also suggested speed limits for limited use areas be lower than non-limited areas. Another commenter suggested issuing an administrative permit to allow access to mining claims that are inaccessible due to road closures. Commenters indicated the BLM needs a public education program to educate trail users on BLM travel management regulations in an effort to further involve the public. The public education program could create avenues in which members of the public can volunteer to assist the BLM in managing off-road routes and commenters suggested different ways an education program could be paid for and implemented. Commenters also suggested coordinating with the U.S. Forest Service on implementation efforts along the boundary of the San Bernardino National Forest and BLM-administered land.

Route-Specific Designation

Category #14 – Travel Management Area 1 (Broadwell Lake, Afton Canyon, and East of Barstow signing sub-regions)

Site-specific comments submitted on TMA 1 addressed issues of access, recreation, visual and cultural resources, paleontological study and education, and protection of wildlife habitat. Most commenters requested access to specific areas like Southern Cady Mountains, Afton Canyon, and Broadwell Lake. Many commenters cited areas in TMA 1 as being excellent areas for "rockhounding" and some noted that access to certain scenic and other recreational sites was not feasible without motorized vehicle routes. Some site-specific comments and requests regarding TMA 1 included:

- Maintain and open additional routes in Afton Canyon and Broadwell Lake subregions to allow for study of important paleontological resources.
- Maintain access across TMA 1 for seniors and disabled persons.

Category #15 – Travel Management Area 2 (Sierras, Darwin, and North and South Searles signing sub-regions)

Site-specific comments submitted on TMA 2 addressed issues of access, recreation, education, and protection of other resource values. Commenters raised issues regarding the impact of routes in TMA 2 on air quality, soils, watershed, vegetation, air, cultural resources, and wildlife. Some commenters specifically requested the BLM mitigate impacts to air quality near the town of Darwin. Several commenters raised concerns about the safety of specific routes in TMA 2 and asked the BLM improve routes to provide safer use, including recommending locations for OHV staging areas. Commenters noted TMA 2 is a favorite location for "rockhounding" and other recreational activities, and commenters provided extensive documentation supporting their rationale for maintaining certain routes as open. Some site-specific comments and requests regarding TMA 2 included:

- Retain access to historical mine sites in the Owens Valley for educational excursions.
- Provide alternative routes to the town of Darwin in case of emergency.
- Provide access to the town of Darwin's water pipeline.
- Provide access to a microwave relay station near the town of Darwin.
- Designate a staging area outside of the inhabited portions of the town of Darwin.
- Maintain singe-track system across TMA 2.

Category #16 – Travel Management Area 3 (Juniper, Rattlesnake, Morongo, Wonder Valley, and Joshua Tree signing sub-regions)

Site-specific comments submitted on TMA 3 addressed issues of access, recreation, trespass, safety, farming and ranching, mining claim access, paleontological study, routes near wilderness areas and national parks, and protection of other resource values. Many commenters raised issues regarding the impact of routes within TMA 3 on air quality, soils, watershed, vegetation, air, cultural resources, and wildlife. Commenters specifically noted that OHV use has been shown to be detrimental to special status plants and wildlife in TMA 3. Additionally, commenters voiced concerns regarding the presence of routes within wilderness areas and intersections with county maintained roads near residential communities, specifically near the Wonder Valley community. Many commenters noted deterioration in the quality of life as a result of increased OHV use. One commenter encouraged the BLM to view the route designation process as an opportunity to address resource concerns and alleviate pressure on sensitive areas in TMA 3. Another commenter requested clarification regarding closures near the Bighorn Mountain Wilderness Area and Viscera Springs. Commenters referenced the lack of signage designating areas as open or closed and a few commenters recommended signage to help riders delineate between BLM-administered land and private property and include speed limits. Several commenters were concerned about the noise created by OHVs. Commenters voiced support or opposition for maintaining specific routes in TMA 3 and many provided rationale for their opinions such as access to mining claims, safety, and conflict with livestock. Some site-specific comments and requests regarding TMA 3 included:

- Permanently close routes in the Morongo Basin adjacent to private property and in fragile habitat.
- Remove off-road vehicle routes near Cleghorn Lakes and Sheephole Wilderness Areas and near Joshua Tree National Park.
- Address "encampments" of off-roaders near Joshua Tree National Park on Old Dale Road.
- Close neighborhood routes in the Wonder Valley for reasons of safety and quality of life.

- Retain access to sites of paleontological importance in Juniper Flats subregion.
- Address illegal motorized vehicle use in Juniper Flats subregion.

Category #17 – Travel Management Area 4 (Jawbone, Middle Knob and Lancaster signing sub-regions)

Site-specific comments submitted on TMA 4 addressed issues of access, recreation, cultural resources, safety, illegal access and trespass, and protection of sensitive wildlife habitat. Several commenters supplied supporting information for a trail system in the Jawbone subregion known as the Jawbone Canyon Store Trail System. Support for the Jawbone Canyon Store Trail System was a common sentiment expressed by other commenters. Additionally, several commenters requested access to currently closed areas as well as general requests to increase the number of trails available. Some commenters expressed concern about fenced trails that funneled all users onto the same trails and resulted in unsafe conditions. Other commenters wanted areas designated for specific types of OHV use only. Some site-specific comments and requests regarding TMA 4 included:

- Increase single-track in Jawbone.
- Close unauthorized trails along Kelso Valley Road, Piute Mountain Road, and St. John's Ridge.
- Open Butterbredt Peak area to more vehicle access.
- Address unauthorized access in the Middle Knob subregion, specifically near the Tehachapi Mountains to protect sensitive cultural resources.
- Reopen the St. John's Ridge trail.
- Close raptor habitat in the Jawbone-Butterbredt ACEC to motorized vehicle travel.
- Address unauthorized access in the Burring Moscow Spring drainage.
- Protect the Pacific Crest Trail from damage from motorized vehicle use.

Category #18 – Travel Management Area 5 (WEMO North Barstow Desert Wildlife Management Area signing sub-region north of Interstate-15 and State Route 58)

Site-specific comments submitted for TMA 5 addressed issues of access, trespass, recreation, gem and mineral collection, paleontological study, and protection of wildlife habitat. The majority of commenters advocated for opening specific routes for rock-collecting, mining claim access, paleontological study, and OHV use, primarily in the Cronese Lake subregion. One commenter requested closing a route due to nearby sensitive species. Some site-specific comments and requests regarding TMA 5 included:

- Address parking near Soda Mountain.
- Maintain access to Mud Hills in the Coolgardie subregion for paleontological and geological study.
- Address unauthorized vehicle use to protect wildlife habitat in Coolgardie Mesa and north of the Minneola Road exit from Interstate-15.
- Protect the Pacific Crest Trail from damage from motorized vehicle use.

Category #19 – Travel Management Area 6 (Mirage (including Edwards Bowl area), Fremont, and Iron Mountain signing sub-regions south of State Route 58)

Site-specific comments submitted on TMA 6 addressed issues of access, trespass, unauthorized use, recreation, and protection of sensitive wildlife and plant species. Some comments alluded generally to the impacts of uncontrolled vehicle use on plant and wildlife populations in TMA 6, while others specifically noted that vehicle staging and camping in the Fremont Subregion and specifically in Edwards Bowl posed potential risk to Barstow woolly sunflower, desert tortoise, and Mojave ground squirrel, and presented a

nuisance to surrounding residents. One commenter expressed concern that routes on BLM-administered land near their property could result in inadvertent trespass and have a detrimental impact on the property's resource values. Another commenter expressed concern about unauthorized use occurring near the historic Mojave Trail. Some site-specific comments and requests regarding TMA 6 included:

- Manage Fremont Peak and Gravel Hills for recreation.
- Manage certain routes in Iron Mountain for motorcycles and certain routes for dual sports events.
- Clarify status of certain routes in Kramer Hills regarding motorcycle use and dual sports event.
- Address unauthorized travel in Point of Rocks.
- Address unauthorized travel in Mojave Fishook Cactus ACEC.

Category #20 – Travel Management Area 7 (Ridgecrest, El Paso, Rands and Red Mtn signing sub-regions)

Site-specific comments submitted on TMA 7 addressed issues of route closure and openings, access, recreation, dual sports events, visual and cultural resources, and protection of sensitive wildlife and plant species. Commenters identified by name or number routes or locations they wanted to see maintained, opened, extended or closed for reasons such as for safety, wildlife viewing, and access to "rockhounding" sites and mining claims. Several commenters expressed strong support for more roads and greater vehicle access across TMA 7 for recreational purposes, including providing vehicle support for equestrian backcountry trips, access to recreational areas for seniors, access to gem and mineral collecting sites, and access to public gathering sites. Some commenters expressed concern regarding proliferation of routes in TMA 7 and the resultant impacts to scenic viewpoints and desert tortoise habitat, while others indicated they wanted to maintain access to scenic areas and cultural sites. Commenters noted the types and characteristics of trails were important considerations and commenters requested more single-track or the re-routing of trails to provide different levels of difficulty. Some of the site-specific comments and requests regarding TMA 7 included:

- Designate the El Paso subregion as a Special Management OHV Area with all trails managed as open.
- Expand the Spangler area to include 'C' routes.
- Re-open routes in Rand Mountains.
- Maintain the former West Rands ACEC as closed to motorized use.
- Maintain route access in El Paso zones 34 and 35 for target shooting and hunting.
- Develop and manage single-track system.
- Provide access to routes in West Rands by permit only.

Category #21 – Travel Management Area 8 (Lands adjacent to Stoddard and Johnson OHV areas, and other signing sub-regions south of Interstate-40 and north of State Route 247 including east of Interstate-15)

Site-specific comments submitted for TMA 8 addressed issues of access, recreation, competitive racing, and gem and mineral collection. Commenters mainly addressed specific routes they would like to remain open for OHV use, rock-collecting, and mining claim access, specifically in the Stoddard Wells-Black Mountain, Talc Mine, and Lavic areas. One commenter expressed concern that the Ord Mountain region was experiencing high levels of illegal use, and another commenter indicated he was concerned about the

expansion of military land into Johnson Valley. Some of the site-specific comments and requests regarding TMA 8 included:

- Designate Camprock Road under RS 2477.
- Increase enforcement in Ord Mountain region.
- Obtain easements from private property owners to connect routes.
- Connect Stoddard Valley Open Area with open areas of Johnson Valley.

3.3.3 Summary of Out of Scope Comments

In addition to the comments described above, the BLM received scoping comments that were outside the scope of analysis for the WEMO Project. Out of scope comments included comments regarding internal BLM operations, comments associated with decisions and actions that will not be made in the WEMO Project EIS, and other comments that are not within the scope of analysis for the WEMO Project EIS.

Many commenters asked the BLM to extend or include additional opportunities for public comments. Some commenters raised issues with BLM staffing, noting that staff turnover, specifically of field managers in the Ridgecrest and Barstow field offices, and the lack of staff that are knowledgeable about travel management issues and FLPMA and NEPA generally, was a detriment to the WEMO Project. One commenter specifically requested BLM staff be licensed and trained to operate OHVs and spend time riding with the OHV community to better understand their needs, and another commenter expressed concern with how BLM staff was upholding the California Desert Protection Act.

A few commenters voiced concerns regarding the BLM's budget and whether it will be adequate to complete and enforce the route designations. Other comments questioned how the BLM could complete the project on a condensed timeline when the original project took 15 years.

Some commenters requested decisions on actions outside the BLM's authority including a congressional proposal to restrict access in portions of the Mojave Desert, and the creation or removal of wilderness areas. Other comments requested the BLM address decisions outside the scope of the WEMO Project EIS, including managing target shooting, controlling burro populations, and addressing safety concerns associated with abandoned mine lands.

4.0 ISSUES IDENTIFIED DURING SCOPING

Based on the comments submitted during scoping and summarized above, the BLM developed 18 issue statements, in the form of questions, which describe the general issues and concerns identified during scoping. This section also includes specific questions and concerns encapsulated within each issue statement, displayed in bullet-point format beneath each issue statement. Issue statements are organized by comment category (e.g., Route Designation Process) although the relationship between comment category and issue statement is not necessarily one to one – a comment category may have none, one or multiple issue statements based on the broad concerns raised by commenters. Because general or network wide and site-specific route designation comments raised the same issues (the latter raising issues by location rather than generally), issue statements appear only under the General and Network Wide Route Designation categories.

The BLM will continue to consider issues during the WEMO Project as it receives additional input from the public, Cooperating Agencies, Tribes, the DAC, and other affected parties.

National Environmental Policy Act Process

Issue: How will BLM define the scope of the WEMO Project and effectively engage the public and stakeholders in the process?

Livestock Grazing

Issue: How will the WEMO Project address livestock grazing impacts?

- What are the site-specific and cumulative impacts of livestock grazing?
- How will the BLM analyze and mitigate the impacts from livestock grazing on resources and resource uses?

Route Designation Process

Issue: How will the BLM designate and evaluate routes in the WEMO Plan considering other travel management processes and plans?

- Will the WEMO Project incorporate the CAPA process?
- How will the route designation process comply with the court mandates and relevant federal, state, and local policies, regulations, and land use plans?
- How will the BLM manage and maintain the route network?
- How can the BLM maintain connectivity with other planning areas?
- What options to closing routes are available if the BLM identifies conflicts with 43 CFR 8342.1?

Issue: Will the BLM designate and evaluate routes using the subregion or regional approach?

- Will the BLM analyze motor vehicle use separately or combined with subregion route designation?

General and Network Wide Route Designation

43 CFR 8342.1(a) – Route Designation Criterion A

Issue: How will the BLM comply with route designation Criterion A (43 CFR 8342.1[a]) to minimize damage to air, soil, watershed, vegetation and other resources?

- Consider impacts to special status plant species.
- What methods or actions can improve air quality in the planning area and minimize potential effects on human health?
- Use the Visual Resource Management system to evaluate and minimize impacts on visual resources.
- Utilize soil erosion potential ratings and other tools to identify areas or routes to be avoided, closed, or rehabilitated to minimize impacts on soils.

43 CFR 8342.1(b) – Route Designation Criterion B

Issue: How will the BLM comply with route designation Criterion B (43 CFR 8342.1[b]) to minimize harassment to wildlife or significant disruption of wildlife habitats?

- Minimize effects of motorized and non-motorized recreation on wildlife, including special status species and their habitats in the planning area.
- What management actions and other strategies can minimize habitat fragmentation in and around the WEMO Project planning area?
- Avoid designating routes in critical habitat, riparian areas, and other sensitive habitats.

43 CFR 8342.1(c) – Route Designation Criterion C

Issue: How will the BLM comply with route designation Criterion C (43 CFR 8342.1[c]) to minimize conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or neighboring public lands, and to ensure the compatibility of such uses with existing conditions in populated areas?

- Identify areas and trails to be designated for non-motorized recreation.
- Identify areas and routes to be designated for specific types of motorized use (e.g., motorcycle only versus quad trails, touring versus staging areas, etc.).
- How will route designation and travel management minimize effects of motorized recreation on the surrounding community and adjacent landowners?
- Identify routes or areas for closure to reduce conflicts with adjacent landowners.
- Minimize effects of OHV events on the surrounding community.
- How can the BLM improve enforcement and compliance with rules, regulations and policies for motorized recreation?
- What measures can reduce effects of noise and dust on the surrounding community and adjacent landowners?

43 CFR 8342.1(d) – Route Designation Criterion D

Issue: How will the BLM comply with route designation Criterion D (43 CFR 8342.1[d]) to prohibit trails in officially designated wilderness areas or primitive areas?

- Comply with policies, regulations and laws related to wilderness areas.
- Identify routes to be closed or use limited near or within wilderness areas, primitive areas, and areas where sensitive resources occur.
- What methods and tools can the BLM implement to protect wilderness and sensitive resources?

Network Purpose or Need

Issue: How will travel management and route designation meet and balance the needs of public land interests?

- How can the WEMO Plan balance designating routes while enhancing recreation opportunities in the planning area?
- How can the BLM maintain access for all users including seniors or disabled persons?
- How many new trails and types of opportunities can the WEMO planning area accommodate?
- How many and which trails will be opened, closed or use limited to minimize impacts (recreation and resource) while maintaining safety?

Range of Alternatives

Issue: How will the BLM develop reasonable alternatives representing a range of travel management opportunities that meet the purpose and need?

- Consider a range of alternatives including an alternative that maximizes the route network and one that maximizes resource protection.
- What mix of motorized and non-motorized opportunities best meets the purpose and need of the route designation process?
- How many different network scenarios can the BLM formulate?
- What components in each scenario (types of opportunities, destinations) are important to address both motorized and non-motorized recreation?

Data and Route Inventory

Issue: How will the BLM compile appropriate data and baseline information to inform the route designation process, guide the impact analysis, and engage the public?

- Consider existing data sources applicable to recreation and natural resources, including rock, gem, mineral and fossil collecting sites, other planning efforts underway in the region, and wildlife linkage studies and maps.
- Use up-to-date scientific information on resources and potential impacts of recreation.
- Identify appropriate methods and data needed.
- Consider using information from previously published maps, surveys, and designation efforts.
- Engage and utilize public and stakeholder knowledge of the planning area.
- Use mapping products to effectively inform the public.

- Identify and implement methods to verify routes including collaborating with public and stakeholders.
- What level of detail is needed to inform the public so they can effectively comment on the route network?
- Consider ways to make maps and data more readily available to the public.

Analysis and Impacts

Issue: How will the BLM analyze and consider the range of potential impacts to resources and resource uses from route designation in the planning area?

- Consider route-specific factors when analyzing the route network.
- Analyze both local and regional impacts to air quality from motorized vehicle use and construction and maintenance of routes.
- Analyze impacts to mineral resource extraction and related socioeconomic impacts from route minimization.
- Analyze the impacts to BLM sensitive, rare, threatened and endangered species and their habitats.
- Analyze how climate change would affect the proposed WEMO Project and how the WEMO Project would affect climate change.
- Analyze how route designation will affect motorized and non-motorized recreation.
- Analyze impacts from the WEMO Project on the social and economic conditions of local and regional communities.
- Analyze impacts to soil, including effects on erosion, from motorized vehicle use.
- Analyze impacts to special designations and other management areas including ACECs, national parks, and wilderness areas.
- Analyze impacts to visual resources from route designation and motorized vehicle use in the short and long term.
- Analyze impacts to riparian areas, wetlands, springs, seeps and other water dependent resources.

Issue: How will the WEMO Project address cumulative impacts associated with past, present, and reasonably foreseeable development in the region?

- What past, present, and reasonably foreseeable projects and their connected actions would be appropriate to include in the cumulative impacts analysis?
- Consider the cumulative impact of road closures.
- How will the expansion of the U.S. Marine Corps Air Ground Combat Center Twentynine Palms affect the route network in the planning area, and how will the BLM address impacts?

Mitigation and Minimization

Issue: How will the BLM mitigate the loss of access from road closures?

- Should the BLM establish a mitigation bank or use other methods to account for the loss of road or trail mileage through the route designation process?
- How will the BLM mitigate road closures in a manner that has the least impact on other uses?
- Mitigate for the loss of off-road access due to renewable energy, military projects, and other projects that occur in the planning area.

Issue: How should the WEMO Project mitigate or minimize the impacts to other resource values from motorized vehicle travel?

- Routes designated as open should minimize impacts to natural and cultural resources, air and water quality, scenic values, and non-motorized uses of public lands or adjacent or interspersed private lands.
- Identify and remove redundant routes.
- Consider the minimization criteria specified in 43 CFR 8342.
- Limit the number of routes in sensitive areas.

Implementation and Administrative Actions

Issue: How will the BLM use signage to identify designations and reduce the potential for conflict?

- Which route designations will receive signs (closed, open, limited, or a combination thereof)?
- What information will the BLM post on signs and kiosks to inform and educate trail users?
- Should the BLM post route signs near sensitive resources at the risk of bringing attention to the resources?
- What measures should the BLM implement related to signage to improve user safety?
- How will the BLM address vandalism of signs and kiosks?

Issue: How will the WEMO Plan address monitoring and rehabilitation of the WEMO route network?

- Consider a monitoring plan.
- Consider establishing a threshold that identifies a level of unacceptable impact.
- How can the BLM increase the efficiency of rehabilitating closed routes and reduce unauthorized travel on closed routes?

Issue: How will the BLM educate the public on the revised route designations and enforce BLM travel management rules and regulations?

- What methods can the BLM use to improve enforcement of route designations and restrictions?
    - Improve collection of enforcement violation data.
- What types of outreach programs will be most effective for educating trail users and reducing the number of violations?
- Consider volunteers to help manage and maintain the route network.

5.0 SUMMARY OF FUTURE STEPS IN THE PROCESS

Now that scoping is complete, the BLM will develop a reasonable range of alternatives that address the issues identified during scoping and complete travel management plans for each of the eight TMAs. The alternatives will offer distinctive choices among travel management strategies and provide management direction for the eight travel management plans. The BLM will analyze each of the alternatives in the EIS to assess the environmental impacts of the alternatives.

The next formal opportunity for public comment will be when the BLM releases the Draft EIS, anticipated June 2013. The BLM will continue to accept and consider all public input throughout the WEMO Project process. Additionally, the BLM will continue to coordinate with Cooperating Agencies, Tribes, the DAC, and other interested parties during the WEMO Project development process.

The BLM will publish a Notice of Availability (NOA) for the Draft EIS in the Federal Register announcing availability of the Draft EIS for review and comment. Publication of the NOA for the Draft EIS will initiate a public comment period during which the BLM will invite the public and other interested parties to provide comments on the Draft EIS. The BLM will hold public meetings during the public comment period and will advertise the meetings through mailings to contacts on the project mailing list and through other notification methods. The BLM will review and consider all comments received on the Draft EIS during the public comment period. The BLM will revise the Draft EIS as appropriate based on public comments, and will incorporate all substantive comments and responses into the Final EIS. The BLM will publish an NOA for the Final EIS in the Federal Register announcing the availability of the Final EIS. The BLM anticipates releasing the Final EIS in November 2013.

Following the release of the Final EIS, the BLM will prepare a ROD, documenting the selected alternative. The BLM anticipates publishing the ROD in January 2014.

In the near term, the BLM is preparing and posting on the WEMO Project website baseline data depicting the current route network for each of the TMAs in the planning area. The BLM anticipates posting data for all TMAs by mid-July 2012.

West Mojave Route Network Project

Scoping Report

Appendix A

Scoping Notification

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APPENDIX A
SCOPING NOTIFICATION

Notice of Intent

56466 **Federal Register** / Vol. 76, No. 177 / Tuesday, September 13, 2011 / Notices

(Presidentially Declared Disasters); 97.039, Hazard Mitigation Grant.)

W. Craig Fugate,

Administrator, Federal Emergency Management Agency.

[FR Doc. 2011–23326 Filed 9–12–11; 8:45 am]

BILLING CODE 9111–23–P

DEPARTMENT OF THE INTERIOR

Bureau of Indian Affairs

Indian Gaming

AGENCY: Bureau of Indian Affairs, Interior.

ACTION: Notice of Approved Tribal—State Class III Gaming Compact.

SUMMARY: This notice publishes an approval of the gaming compact between the Flandreau Santee Sioux Tribe and the State of South Dakota.

DATES: *Effective Date:* September 13, 2011.

FOR FURTHER INFORMATION CONTACT: Paula L. Hart, Director, Office of Indian Gaming, Office of the Deputy Assistant Secretary—Policy and Economic Development, Washington, DC 20240, (202) 219–4066.

SUPPLEMENTARY INFORMATION: Under section 11 of the Indian Gaming Regulatory Act of 1988 (IGRA) Public Law 100–497, 25 U.S.C. 2710, the Secretary of the Interior shall publish in the **Federal Register** notice of approved Tribal-State compacts for the purpose of engaging in Class III gaming activities on Indian lands. This Compact increases the number of gaming devices for which the Tribe is authorized to operate from 250 to 500.

Dated: August 31, 2011.

Larry Echo Hawk,

Assistant Secretary—Indian Affairs.

[FR Doc. 2011–23389 Filed 9–12–11; 8:45 am]

BILLING CODE 4310–4N–P

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

[LLOR957000–L63100000–HD0000: HAG11–0343]

Filing of Plats of Survey: Oregon/Washington

AGENCY: Bureau of Land Management, Interior.

ACTION: Notice.

SUMMARY: The plats of survey of the following described lands are scheduled to be officially filed in the Bureau of Land Management Oregon/Washington State Office, Portland, Oregon, 30 days from the date of this publication.

Willamette Meridian, Oregon

T. 30 S., R. 2 W., accepted August 18, 2011.
T. 20 S., R. 6 W., accepted August 18, 2011.
T. 18 S., R. 12 W., accepted August 18, 2011.
T. 16 S., R. 1 W., accepted August 29, 2011.
T. 19 S., R. 8 W., accepted August 29, 2011.
T. 13 S.,R. 6 W., accepted August 30, 2011.
T. 3 S., R. 3 E., accepted August 30, 2011.

ADDRESSES: A copy of the plats may be obtained from the Land Office at the Bureau of Land Management, Oregon/Washington State Office, 333 SW. 1st Avenue, Portland, Oregon 97204, upon required payment. A person or party who wishes to protest against a survey must file a notice that they wish to protest (at the above address) with the Oregon/Washington State Director, Bureau of Land Management, Portland, Oregon.

FOR FURTHER INFORMATION CONTACT: Kyle Hensley, (503) 808–6124, Branch of Geographic Sciences, Bureau of Land Management, 333 SW. 1st Avenue, Portland, Oregon 97204. Persons who use a telecommunications device for the deaf (TDD) may call the Federal Information Relay Service (FIRS) at 1–800–877–8339 to contact the above individual during normal business hours. The FIRS is available 24 hours a day, 7 days a week, to leave a message or question with the above individual. You will receive a reply during normal business hours.

SUPPLEMENTARY INFORMATION: Before including your address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

Fred O'Ferrall,

Chief, Branch of Land, Mineral, and Energy Resources.

[FR Doc. 2011–23303 Filed 9–12–11; 8:45 am]

BILLING CODE 4310–33–P

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

[[LLCAD00000.L91310000.EI0000]

Notice of Intent to Prepare an Environmental Document and Proposed Plan Amendment for the West Mojave (WEMO) Plan, Motorized Vehicle Access Element, Inyo, Kern and Los Angeles and San Bernardino Counties, CA

AGENCY: Bureau of Land Management, Interior.

ACTION: Notice of intent.

SUMMARY: In compliance with the *National Environmental Policy Act of 1969,* as amended (NEPA), and the *Federal Land Policy and Management Act of 1976,* as amended (FLPMA), the Bureau of Land Management (BLM) California Desert District (CDD) intends to prepare an environmental document to amend the West Mojave (WEMO) area plan. By this Notice, the BLM is announcing the beginning of the scoping process to solicit public comments.

DATES: This notice initiates the public scoping process for the environmental document and proposed plan amendment. Comments on issues may be submitted in writing until October 13, 2011. The date(s) and location(s) of any scoping meetings will be announced at least 15 days in advance through the local news media, newspapers, and the BLM Web site at: *http://www.blm.gov/ca/st/en/fo/cdd.html.* In order to be fully considered in the environmental document, all scoping comments must be received prior to the close of the scoping period or 15 days after the last public meeting, whichever is later. The BLM will provide additional opportunities for public participation upon publication of the environmental document.

ADDRESSES: The public may submit comments on planning criteria and related issues, by any of the following methods:

- *E-mail: cawemopa@blm.gov.*
- *Web site: http://www.blm.gov/ca/st/en/fo/cdd/west_mojave_wemo.*
- *Fax:* (951) 697–5299.
- *Mail:* BLM California Desert District Office, 22835 Calle San Juan de Los Lagos, ATTN: Alan Stein, Moreno Valley, CA 92553–9046.

Documents relevant to this proposal may be examined at the California Desert District Office or Web site (address above), or the BLM's California State Office, 2800 Cottage Way, Sacramento, CA 95825.

FOR FURTHER INFORMATION CONTACT: Alan Stein, telephone (951) 697–5382; address Bureau of Land Management, California Desert District Office, 22835 Calle San Juan de Los Lagos, ATTN: Alan Stein, Moreno Valley, CA 92553–9046; e-mail *cawemopa@blm.gov*. Persons who use a telecommunications device for the deaf (TDD) may call the Federal Information Relay Service (FIRS) at 1–800–877–8339 to contact the above individual during normal business hours. The FIRS is available 24 hours a day, 7 days a week, to leave a message or question with the above individual. You will receive a reply during normal business hours.

SUPPLEMENTARY INFORMATION: The California Desert Conservation Area (CDCA) Plan of 1980 addressed public-land resources and resources use within 25-million acres of land in southern California. The 1980 CDCA Plan included 12 plan elements, including a Motorized Vehicle Element. The Motorized Vehicle Access Element of the CDCA Plan addressed both access and vehicular use of public lands in southern California, and identified management guidelines and objectives. The CDCA Plan of 1980 has been amended numerous times since it was adopted in 1982. The CDCA Plan contains language that has been judicially determined to restrict motorized routes to those that existed in 1980.

In 2006, the BLM approved a comprehensive amendment to the West Mojave area of the CDCA Plan. In a 2006 Western Mojave Record of Decision (WEMO ROD) the BLM amended the CDCA Plan and modified its motorized vehicle management decisions, including off-highway vehicle (OHV) route designation, on more than 3 million acres of public land within the CDCA. The 2006 WEMO ROD approved the designation of 5,098 miles of motorized vehicle routes without specifically changing the language of the 1980 CDCA plan.

A lawsuit was filed challenging the WEMO ROD's route designation process. In January 2011, a court order remanded the 2006 WEMO ROD to the BLM and, in part, directed the BLM to amend the CDCA Plan and reconsider route designation throughout the WEMO area. By court order, the BLM must issue a revised decision by March 31, 2014.

A plan amendment is necessary to update language in the Motorized Vehicle Access Element of the CDCA Plan. The plan amendment, and associated environmental documents, will address two components, among others: (1) Alternatives for amending the Motorized Vehicle Access Element of the CDCA Plan for the WEMO area; and (2) Alternative processes for designating travel routes within the sub-regional areas of the WEMO plan area.

The main purpose of the scoping process is to solicit public comments on the following:

1. Identification of those portions of the WEMO plan that should be revised to reflect current management policy regarding motorized vehicle access;
2. Identification of the process and decision criteria that should be used to designate routes in the sub-regional areas of the WEMO plan area;
3. Identification of motorized vehicle use issues and concerns within each sub-regional area of the WEMO plan area;
4. Identification of the best science and technology available to identify and establish viable route networks in the sub-regional areas of the WEMO plan area; and
5. Whether the BLM should analyze an amendment to the WEMO plan as it relates, primarily, to motorized vehicle use separately or in conjunction with sub-regional route designation, and alternatives to route designation.

The proposed planning effort would allow the BLM to revise portions of the Motorized Vehicle Element of the CDCA Plan to more clearly describe how motorized vehicle use will be managed in the CDCA according to current BLM policy. A primary objective of the proposed action for this plan amendment is to replace the following CDCA Plan language: "at the minimum, use will be restricted to existing routes of travel," with language that reflects current BLM policy, such as restricting motorized vehicle use to designated routes. Other language from the CDCA Plan may be modified to reduce confusion and clearly state to the public where motorized vehicle use is appropriate and where it is inappropriate.

Further, subsequently, concurrently, or in a combination of both, additional environmental analysis would address current route designation within the WEMO sub-regional areas. This analysis would result in new decisions for each sub-regional area within the WEMO plan area that would either retain or modify, in whole or in part, current route designations. New route designation decisions would be issued in accordance with the route designation criteria in 43 CFR 8342.1, and in consideration of other applicable laws, regulations, and policies.

The public scoping process for this action will also determine relevant issues, impacts, and possible alternatives that could influence the scope of the environmental analysis, and guide the entire process from plan decision-making to route designation review in order to comply with the court order.

The BLM has identified the following preliminary issues of concern: Special status species, vegetation communities (including unique plant assemblages), special area designations, air quality in previously designated open areas, cultural resources, soils, springs and seeps, fringe-toed lizard habitat, and cumulative effects.

By this Notice, the BLM is complying with requirements in 43 CFR 1610.2(c) to notify the public of potential amendments to land use plans. The BLM will integrate the land use planning process with the NEPA process. The scoping process will help determine whether the BLM prepares an environmental assessment or an environmental impact statement (EIS), based on the anticipated level of impacts. In the event the BLM elects to prepare an EIS, this notice satisfies the requirement in 40 CFR 1501.7 to publish a Notice of Intent to prepare an EIS.

The BLM will utilize and coordinate the NEPA commenting process to satisfy the public involvement process for Section 106 of the *National Historic Preservation Act* (NHPA) (16 U.S.C. 470(f)), as provided for in 36 CFR 800.2(d)(3). Tribal consultations will be conducted in accordance with policy, and tribal concerns including impacts on Indian trust assets, if any, will be given due consideration. Federal, State, and local agencies, along with other stakeholders that may be interested or affected by the BLM's decision on this proposed plan amendment or implementation decisions, are invited to participate in the scoping process, and the whole of the public involvement process.

Preliminary planning criteria include the following:

1. The plan amendment will comply with FLPMA, NEPA, and all other applicable laws, regulations, and policies.
2. For program-specific guidance for decisions at the land use planning level, the process will follow the BLM's policies in the Land Use Planning Handbook, H–1601–1 and Manual Section 1626, Travel and Transportation Management.
3. Public participation and collaboration will be an integral part of the planning process.
4. The BLM will strive to make decisions in the plan compatible with

the existing plans and policies of adjacent local, State, and Federal agencies and local American Indian tribes, as long as the decisions are consistent with the purposes, policies, and programs of Federal law and regulations applicable to public lands.

5. The plan amendment will incorporate, where applicable and appropriate, management decisions brought forward from existing planning documents.

6. The BLM will work collaboratively with cooperating agencies and all other interested groups, agencies, and individuals.

7. GIS and metadata information will meet Federal Geographic Data Committee standards, as required by Executive Order 12906. All other applicable BLM data standards will also be followed.

8. The planning process will provide for ongoing consultation with American Indian tribes and strategies for protecting recognized traditional uses, e.g., gathering of traditionally used plant materials.

9. The plan amendment will focus on developing language for the WEMO area that conforms to the goals of the Motorized Vehicle Access Element of the CDCA Plan as described in the 1982 Plan Amendment #3.

Before including your address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment—including your personal identifying information—may be made available any time. While you can ask the BLM in your comment to withhold your personal identifying information from public release, the BLM cannot guarantee that we will be able to do so.

Thomas Pogacnik,

Deputy State Director, Natural Resources.

[FR Doc. 2011–23320 Filed 9–12–11; 8:45 am]

BILLING CODE 4310–40–P

DEPARTMENT OF THE INTERIOR

National Park Service

[2253–665]

Notice of Inventory Completion: Maxwell Museum of Anthropology, University of New Mexico, Albuquerque, NM

AGENCY: National Park Service, Interior.

ACTION: Notice.

SUMMARY: The Maxwell Museum of Anthropology, University of New Mexico has completed an inventory of human remains, in consultation with the appropriate Indian tribe, and has determined that there is a cultural affiliation between the human remains and a present-day Indian tribe. Representatives of any Indian tribe that believes itself to be culturally affiliated with the human remains may contact the Maxwell Museum of Anthropology, University of New Mexico. Repatriation of the human remains to the Indian tribe stated below may occur if no additional claimants come forward.

DATES: Representatives of any Indian tribe that believes it has a cultural affiliation with the human remains should contact the Maxwell Museum of Anthropology, University of New Mexico at the address below by October 13, 2011.

ADDRESSES: Heather Edgar, Curator of Human Osteology, Maxwell Museum of Anthropology, University of New Mexico, MSC01 1050, 1 University of New Mexico, Albuquerque, NM 87131, telephone (505) 277–4415.

SUPPLEMENTARY INFORMATION: Notice is here given in accordance with the Native American Graves Protection and Repatriation Act (NAGPRA), 25 U.S.C. 3003, of the completion of an inventory of human remains in the possession of Maxwell Museum of Anthropology, University of New Mexico, Albuquerque, NM. The human remains were removed from Sandoval County, NM.

This notice is published as part of the National Park Service's administrative responsibilities under NAGPRA, 25 U.S.C. 3003(d)(3). The determinations in this notice are the sole responsibility of the museum, institution, or Federal agency that has control of the Native American human remains. The National Park Service is not responsible for the determinations in this notice.

Consultation

A detailed assessment of the human remains was made by Maxwell Museum of Anthropology, University of New Mexico professional staff in consultation with representatives of the Pueblo of Jemez, New Mexico.

History and Description of the Remains

Between the 1930s and 1940s, human remains representing a minimum of 189 individuals were removed from the Unshagi site (LA 123), Sandoval County, NM, during excavations by University of New Mexico field schools. The human remains were accessioned by the museum between 1973 and 1975. No known individuals were identified. No associated funerary objects are present.

Between the 1930s and 1940s, human remains representing a minimum of 78 individuals were removed from the Guisewa site (LA 679), Sandoval County, NM, during excavations by University of New Mexico field schools. The human remains were accessioned by the museum between 1973 and 1975. No known individuals were identified. No associated funerary objects are present.

Between the 1930s and 1940s, human remains representing a minimum of 65 individuals were removed from the Nonishagi site (LA 541), Sandoval County, NM, during excavations by University of New Mexico field schools. The human remains were accessioned by the museum between 1973 and 1975. No known individuals were identified. No associated funerary objects are present.

At unknown dates, human remains representing a minimum of 84 individuals were removed from various sites located in the area of "Jemez." No known individuals were identified. No associated funerary objects are present.

The human remains are identified as ancestral Jemez because they came from Puebloan sites of the upper Jemez River drainage. Populations that inhabited these sites are linked by Native oral tradition, Euro-American records, and archeological evidence to members of the present-day Pueblo of Jemez, New Mexico.

Determinations Made by the Maxwell Museum of Anthropology, University of New Mexico

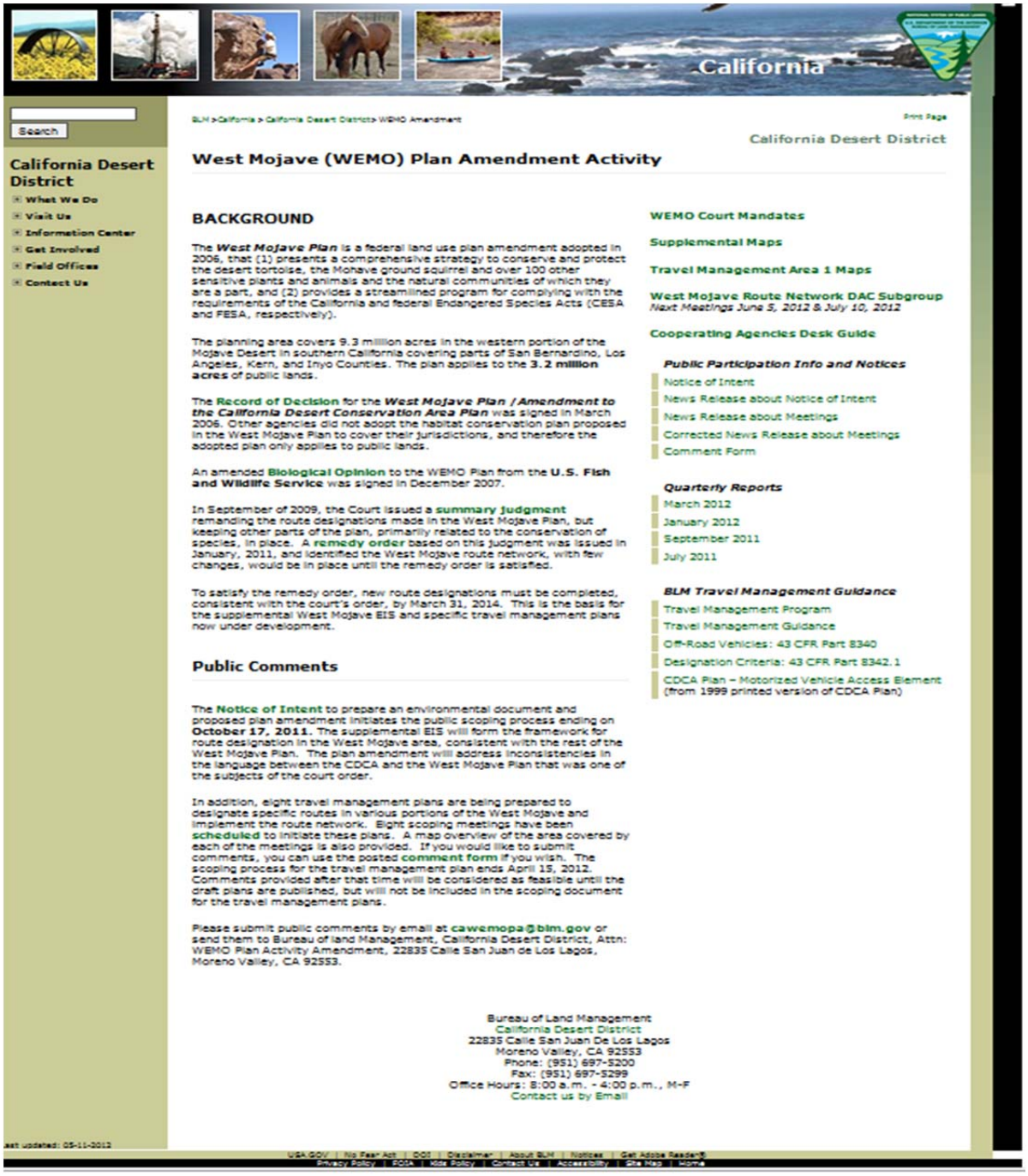
Officials of the Maxwell Museum of Anthropology, University of New Mexico have determined that:

- Pursuant to 25 U.S.C. 3001(9), the human remains described above represent the physical remains of at least 416 individuals of Native American ancestry.
- Pursuant to 25 U.S.C. 3001(2), there is a relationship of shared group identity that can be reasonably traced between the Native American human remains and the Pueblo of Jemez, New Mexico.

Additional Requestors and Disposition

Representatives of any other Indian tribe that believes itself to be culturally affiliated with the human remains should contact Heather Edgar, Curator of Human Osteology, Maxwell Museum of Anthropology, University of New Mexico, MSC01 1050, 1 University of New Mexico, Albuquerque, NM 87131, telephone (505) 277–4415, before October 13, 2011. Repatriation of the human remains to the Pueblo of Jemez, New Mexico, may proceed after that

West Mojave Plan Amendment Website



http://www.blm.gov/ca/st/en/fo/cdd/west_mojave__wemo.html

West Mojave Plan Amendment News Release – 09/13/2011

BLM Announces Intent to Prepare Environmental Document for Motorized Vehicle Management in West Mojave Planning Area (09/13/2011)

U.S. DEPARTMENT OF THE INTERIOR BUREAU OF LAND MANAGEMENT NEWS RELEASE
California Desert District Office

Release Date: 09/13/11
Contacts: Stephen Razo 951-697-5217
David Briery 951-697-5220

News Release No. CA-CDD-11-77

BLM Announces Intent to Prepare Environmental Document for Motorized Vehicle Management in West Mojave Planning Area

The Bureau of Land Management (BLM), California Desert District, announced its intent to prepare an environmental document to analyze a proposed plan amendment and alternatives covering the management of motorized vehicles on public lands in the West Mojave (WEMO) area.

A Notice of Intent to prepare the plan for areas in Inyo, Kern, Los Angeles and San Bernardino counties published in the Federal Register today.

By this Notice, the BLM is announcing the beginning of the scoping process to solicit public comments on:

(1) issues related to plan decisions which will guide the management of motorized vehicle access in the WEMO plan area;
(2) process and decision criteria to be used during plan implementation to designate routes;
(3) issues and concerns within each subregion;
(4) additional issues cited by the January 28, 2011 Court Order including special status species, vegetation communities (including unique plant assemblages), special area designations, air quality, cultural resources, soils, springs and seeps and Mojave fringe-toed lizard habitat; and
(5) the "bundling of analysis areas" for route designation.

A lawsuit was filed by a variety of Plaintiffs challenging the BLM's Record of Decision (ROD) for the 2006 WEMO Plan. On January 28, 2011, the Court issued an Order-Remedy and remanded the 2006 WEMO ROD to the BLM and, in part, directed the BLM to amend the plan and to reconsider route designations. The court required that a revised decision for the WEMO route designation be completed by March 31, 2014.

Two BLM public scoping meetings will be held: one in Ridgecrest and one in Barstow. Details on the public scoping meetings are provided below. Any additional public meetings will be announced through the local news media, newspapers, mailings, and at the BLM web page: http://www.blm.gov/ca/st/en/fo/cdd.html at least 15 days prior to the event.

September 27, 2011: 6:30 pm – 9:30 pm	September 29, 2011: 6:30 pm – 9:30 pm
Kerr McGee Center 100 W. California Ave. Ridgecrest, CA 93555 (760) 499-5151	Hampton Inn 2710 Lenwood Road Barstow, California 92311 (760) 253-2600

The public may submit comments on issues and planning criteria related to the WEMO EA for the Motorized Vehicle Access Element, by any of the following methods:
1) Email: cawemopa@blm.gov
2) Fax: (951) 697-5299
3) Mail: ATTN: Alan Stein, BLM California Desert District Office, 22835 Calle San Juan de Los Lagos, Moreno Valley, CA 92553-9046

Documents pertinent to this proposal may be examined at the California Desert District Office, address above, or the BLM's California State Office, 2800 Cottage Way, Sacramento, CA 95825. For further information contact: Alan Stein, (951) 697-5382.

--BLM--

California Desert District Office 22835 Calle San Juan de Los Lagos, Moreno Valley, CA 92553

Last updated: 09-13-2011

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http://www.blm.gov/ca/st/en/info/newsroom/2011/september/westmojavemotorizedvehiclemgmt.html[5/31/2012 10:40:54 AM]

West Mojave Plan Amendment News Release – 12/21/2011

Public Meetings Scheduled to Address West Mojave Desert Routes of Travel Designations (12-21-2011)

U.S. DEPARTMENT OF THE INTERIOR BUREAU OF LAND MANAGEMENT NEWS RELEASE
California Desert District

Release Date: 12/21/11
Contacts: Stephen Razo, (951) 697-5217 or
David Briery , (951) 697-5220

News Release No. CDD-12-17

Public Meetings Scheduled to Address West Mojave Desert Routes of Travel Designations

The Bureau of Land Management (BLM) has scheduled eight public scoping meetings to gather public comments and recommendations on the preparation of environmental assessments for eight travel management areas within the West Mojave Planning Area. These eight travel management areas are identified on the attached map, and each one will be a focus of one of the eight meetings. This information will be used to compile travel management area information and develop preliminary route network alternatives for the West Mojave planning area.

Area residents and other publics interested in the public lands and the area public lands route network are encouraged to attend. Public input relative to local area knowledge, issues and opportunities, including route access changes, are needed.

Meetings for Travel Management Areas under the jurisdiction of the Barstow Field Office will be held at the Barstow Field Office, 2601 Barstow Road, Barstow, CA 92311. Meetings for Travel Management Areas under the jurisdiction of the Ridgecrest Field Office will be held at the Kerr-McGee Bldg, 100 West California Ave, Ridgecrest, CA 93555.

All scoping meetings are from 4:00 p.m. to 7:00 p.m, and include a presentation and an open-house opportunity to review maps and provide route-specific and location-specific comments to the BLM. The public is encouraged to attend the travel management plan meetings to assure that comments are accurately captured, including location, route or site identification, specific issues, and rationale. You may also provide written comments.

- Monday, January 9 TMA 1: Broadwell Lake, Afton Canyon and East of Barstow Signing Subregions in the Barstow Field Office.
- Wednesday, January 18 TMA 2: Sierras, Darwin, and North and South Searles Signing Subregions in the Kerr-McGee Center.
- Thursday, January 26 TMA 3: Juniper, Rattlesnake, Morongo, Wonder Valley and Joshua Tree Signing Subregions in the Barstow Field Office and the northern most portions of PSSC in WEMO.
- Monday, February 6 TMA 4: Jawbone, Middle Knob and Lancaster Signing Subregions in the Kerr-McGee Center.
- Thursday, February 9 TMA 5: WEMO North Barstow Desert Wildlife Management Area Signing Subregions North of I-15 and SR 58 in the Barstow Field Office.
- Tuesday, February 14 TMA 6: Ridgecrest, El Paso, Rands and Red Mtn Signing Subregions in the Kerr-McGee Center.
- Thursday, February 16 TMA 7: El Mirage (including Edwards Bowl area), Fremont, and Iron Mountains Signing Subregions South of SR 58 in the Barstow Field Office.
- Tuesday, February 21 TMA 8: Lands adjacent to Stoddard and Johnson OHV Areas, and other Signing Subregions in the Barstow and Needles Field Offices South of I-40 and North of SR 247 including, and East of Interstate I-15.

Preliminary alternatives will be provided for review and public comment after scoping for specific areas are completed. Additional public meetings will be held by the Desert Advisory Council Subgroup currently being formed for the West Mojave Route Network. The public will have the opportunity to participate in these subgroup meetings.

The BLM will consider public comments, as feasible, until the BLM proposed Travel Management Plans are published. For more information or to submit a comment contact: Edy Seehafer, West Mojave Project Manager, Bureau of Land Management, 2601 Barstow Road, Barstow, CA 92311, by email at cawemopa@blm.gov , or by phone at (760) 252-6021. Additional information is also posted at the West Mojave Amendment Website at: http://www.blm.gov/ca/st/en/fo/cdd/west_mojave__wemo.html. Please respond by April 15, 2012 with scoping comments and/or to be added to the mailing list.

--BLM--

California Desert District 22835 Calle San Juan de Los Lagos, Moreno Valley, CA 92553

Last updated: 01-06-2012

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http://www.blm.gov/ca/st/en/info/newsroom/2011/december/CDD1217_wemoscope.html[5/31/2012 10:41:26 AM]

West Mojave Plan Amendment News Release – 01/18/2012

BLM Schedules Meetings to Address West Mojave Desert Routes of Travel Designation

U.S. DEPARTMENT OF THE INTERIOR BUREAU OF LAND MANAGEMENT NEWS RELEASE
California Desert District

Release Date: 01/18/12
Contacts: Stephen Razo, 951-697-5217 or
David Briery, 951-697-5220

News Release No. CDD-12-22

BLM Schedules Meetings to Address West Mojave Desert Routes of Travel Designation

The Bureau of Land Management (BLM) has scheduled eight open-house public scoping meetings to gather public comments and recommendations on the preparation of environmental assessments for eight travel management areas (TMAs) within the West Mojave Planning Area.

Area residents and interested members of the public encouraged to attend. The BLM will solicit public input relative to local area knowledge, issues and opportunities, including changes to route access.

Barstow meetings: Barstow Field Office, 2601 Barstow Road, Barstow, CA 92311

- **Thursday, Jan. 26.** TMA 3: Juniper, Rattlesnake, Morongo, Wonder Valley and Joshua Tree signing sub-regions
- **Thursday, Feb. 9.** TMA 5: WEMO North Barstow Desert Wildlife Management Area signing sub-regions north of I-15 and SR 58
- **Tuesday, Feb. 14.** TMA 6: El Mirage (including Edwards Bowl area), Fremont, and Iron Mountains signing sub-regions south of SR 58
- **Tuesday, Feb. 21.** TMA 8: Lands adjacent to Stoddard and Johnson OHV Areas, and other signing sub-regions south of I-40 and north of SR 247 including east of Interstate I-15

Ridgecrest meetings: Kerr-McGee Bldg, 100 West California Ave, Ridgecrest, CA 93555.

- **Wednesday, Jan. 18.** TMA 2: Sierras, Darwin, and North and South Searles signing sub-regions
- **Monday, Feb. 6.** TMA 4: Jawbone, Middle Knob and Lancaster signing sub-regions
- **Thursday, Feb. 16.** TMA 7: Ridgecrest, El Paso, Rands and Red Mtn signing sub-regions

All scoping meetings are from 4 to 7 p.m. and include a presentation and an open-house opportunity to review maps and provide route-specific and location-specific comments to the BLM. The public is encouraged to attend the travel management plan meetings to assure that comments are accurately captured, including location, route or site identification, specific issues, and rationale. You may also provide written comments.

The areas addressed in each of the eight travel management meetings are identified on the attached map. Your scoping information will be used to compile travel management area information and develop preliminary route network alternatives for the West Mojave planning area.

Preliminary alternatives will be posted for review and public comment after scoping for specific areas are completed. Additional public meetings will be held by the Desert Advisory Council Subgroup currently being formed for the West Mojave Route Network. The public will have the opportunity to participate in these subgroup meetings.

The BLM will consider public comments, as feasible, until the BLM proposed Travel Management Plans are published. For more information or to submit a comment contact: Edy Seehafer, West Mojave Project Manager, Bureau of Land Management, 2601 Barstow Road, Barstow, CA 92311, by email at cawemopa@blm.gov, or by phone at (760) 252-6021. Additional information is also posted at the West Mojave Amendment Website at: http://www.blm.gov/ca/st/en/fo/cdd/west_mojave__wemo.html. Please respond by Apr. 15, 2012 with scoping comments and/or to be added to the mailing list.

--BLM--

California Desert District 22835 Calle San Juan de Los Lagos, Moreno Valley, CA 92553

Last updated: 01-18-2012

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http://www.blm.gov/ca/st/en/info/newsroom/2012/january/WEMOmtgs.html[5/31/2012 10:41:48 AM]

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West Mojave Route Network Project

Scoping Report

Appendix B

Scoping Meeting Materials

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Travel Designation Workshop Route Network Map – Rands Subregion B-19
West Mojave Project Comment Form B-20

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APPENDIX B
SCOPING MEETING MATERIALS

This appendix displays some of the materials used for the West Mojave Route Network Project (Project) scoping meetings. Included are the presentations used at the September 27 and 29, 2011 open house scoping meetings, the presentation used at the January 26, 2012 travel designation workshop, a sample route network map, and a copy of the comment form provided at each scoping meeting. The January 26, 2012 presentation and route network map are examples of the materials used at the Travel Management Area-specific scoping workshops held in January and February 2012. The BLM catered each workshop to a specific Travel Management Area, but for brevity, only one presentation and map was included in this appendix.

Scoping Meeting Presentations – September 27 and 29, 2011




Bureau of Land Management - California
West Mojave Plan Amendment
Public Scoping Meeting
Ridgecrest, California
September 27, 2011
California Desert District Office – Moreno Valley, California


Bureau of Land Management - California
WELCOME !
Why Are We Here ??

Bureau of Land Management - California

California Desert District

BLM Proposes to:

Reconsider Plan Level Decisions

-- amend plan if needed

Reconsider network of routes approved in WEMO (March 2006)

-- consistent with travel management guidance

Bureau of Land Management - California

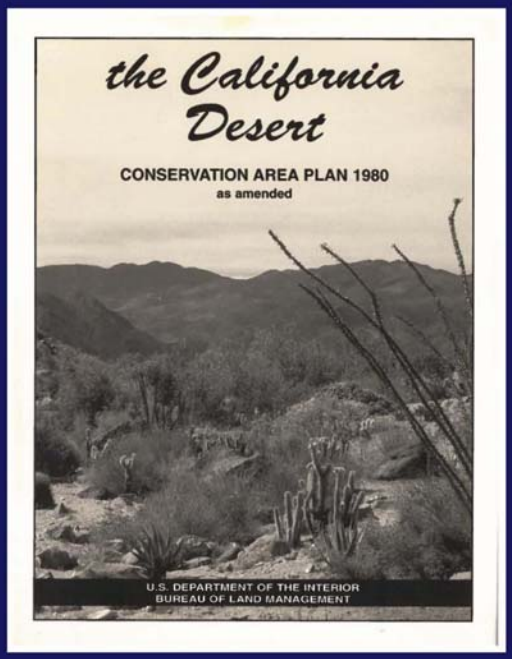
California Desert District

Designated by Congress as a National Conservation Area, this 25 million-acre expanse covers most of southeastern California -- almost a quarter of the entire state. Nearly half of its acreage is a desert conservation showcase managed by the Bureau of Land Management (BLM).



Bureau of Land Management - California

California Desert District



1982 Amendments

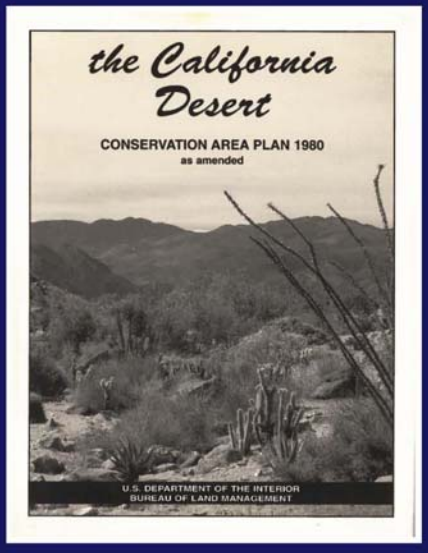
Amendment 3
Motorized Vehicle Element

43 CFR 8342.1 –
Designation Criteria
(minimization criteria)

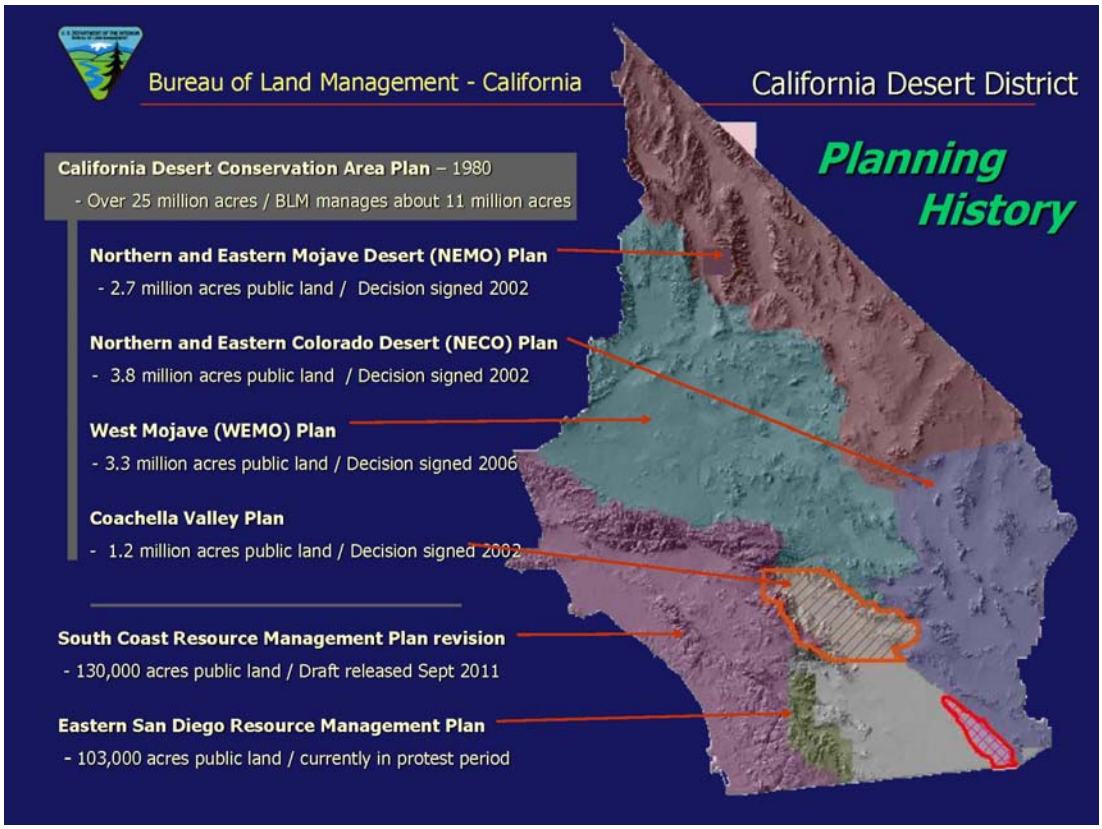
Bureau of Land Management - California

California Desert District

Goal in CDCA Plan 1982 Plan Amendments

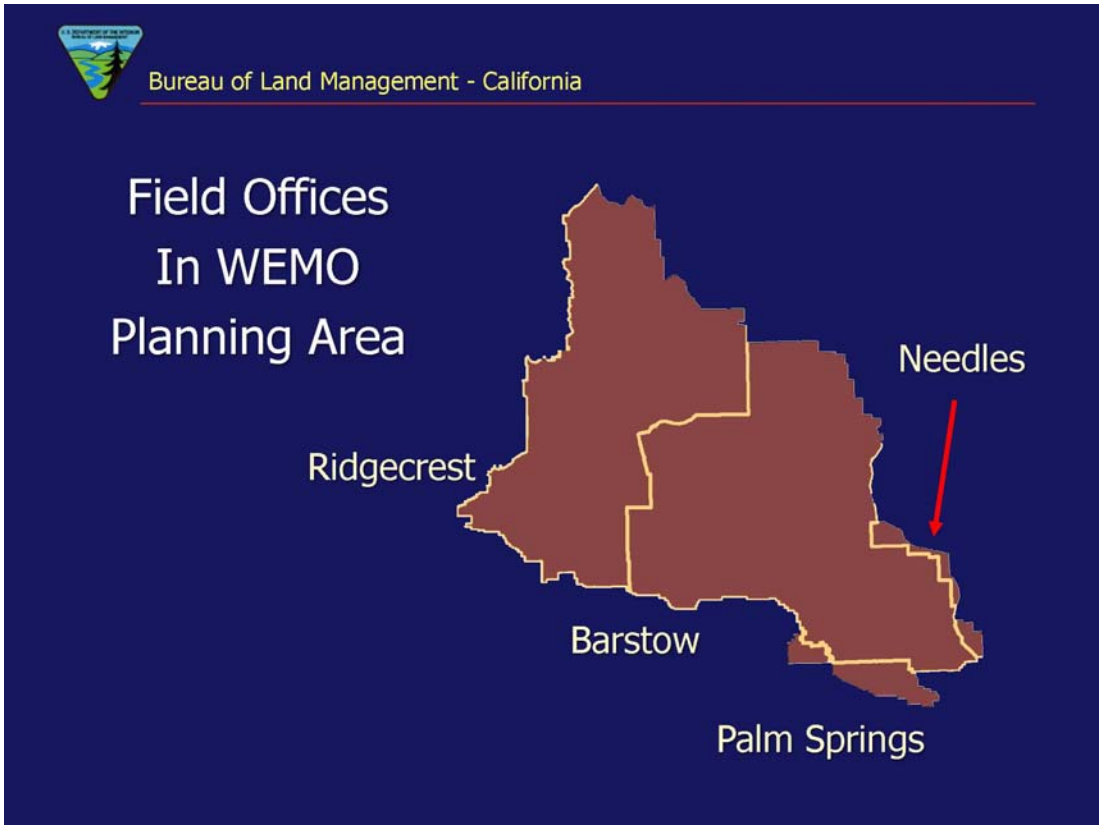


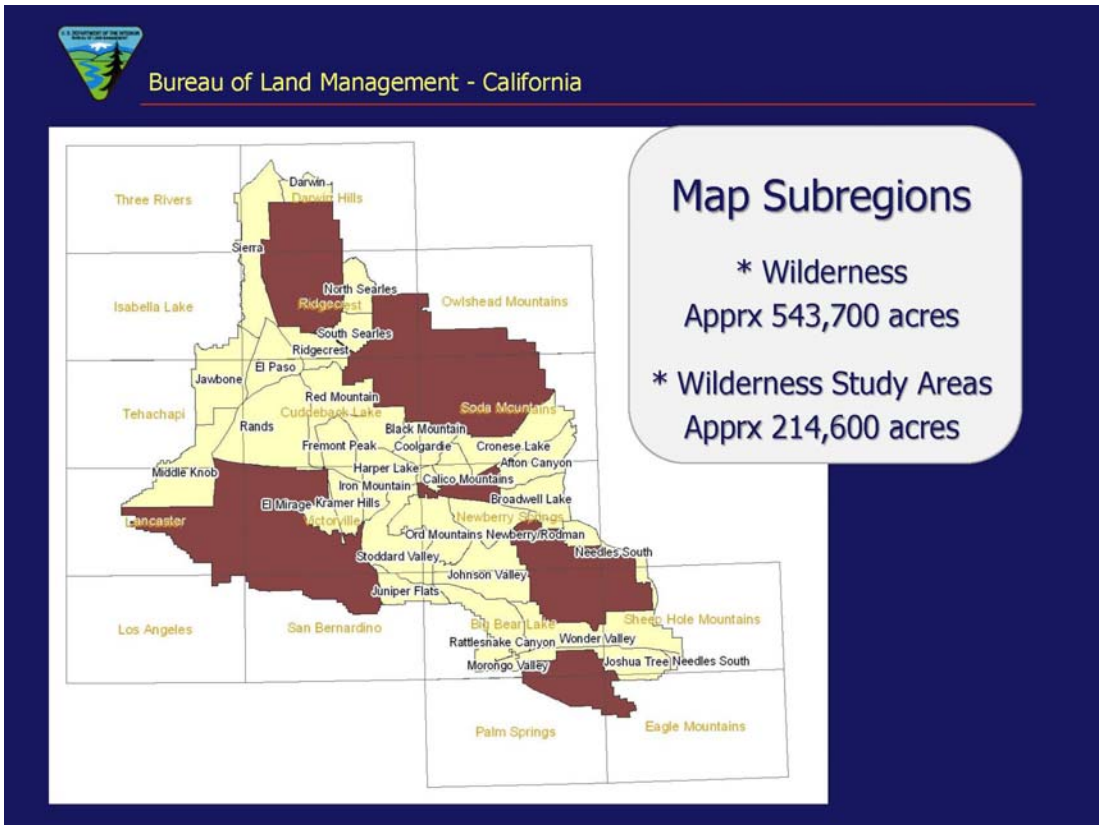
Provide for constrained motorized vehicle access in a manner that balances the needs of all desert users, private landowners and other public resources

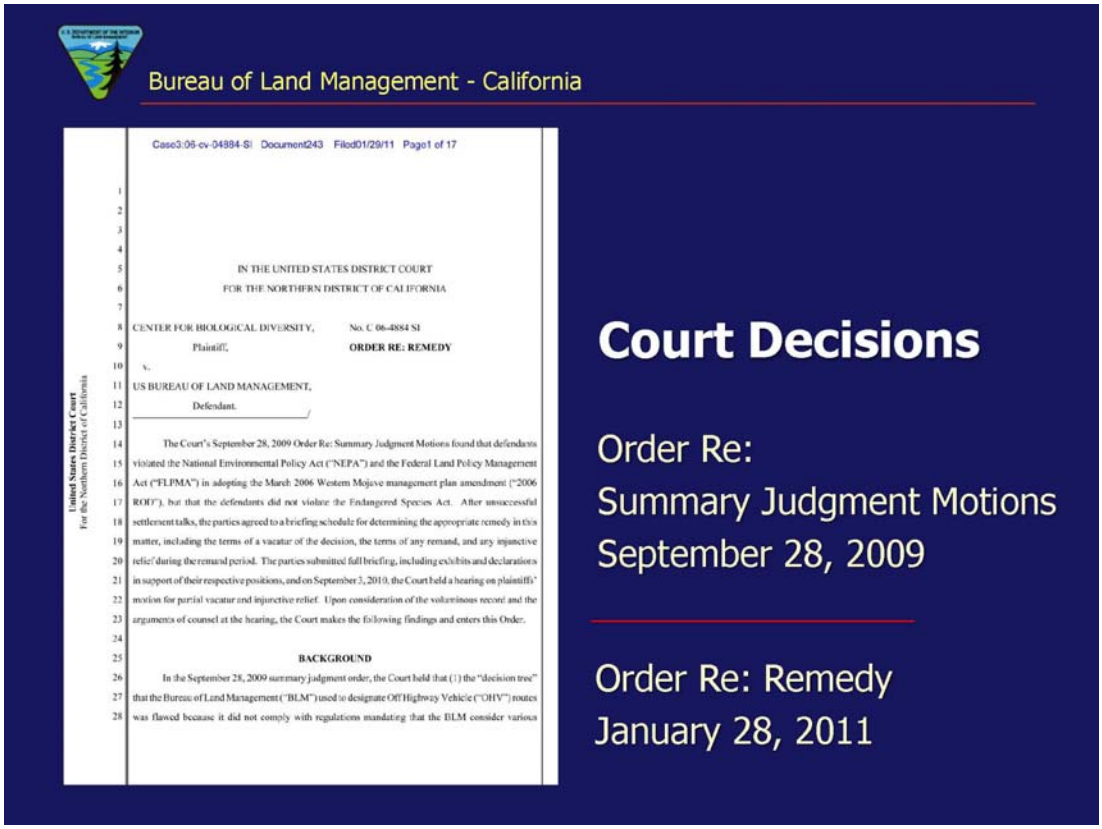

Bureau of Land Management - California
California Desert District
Planning History
California Desert Conservation Area Plan – 1980
- Over 25 million acres / BLM manages about 11 million acres
Northern and Eastern Mojave Desert (NEMO) Plan
- 2.7 million acres public land / Decision signed 2002
Northern and Eastern Colorado Desert (NECO) Plan
- 3.8 million acres public land / Decision signed 2002
West Mojave (WEMO) Plan
- 3.3 million acres public land / Decision signed 2006
Coachella Valley Plan
- 1.2 million acres public land / Decision signed 2002
South Coast Resource Management Plan revision
- 130,000 acres public land / Draft released Sept 2011
Eastern San Diego Resource Management Plan
- 103,000 acres public land / currently in protest period


Bureau of Land Management - California
California Desert District
U.S. Department of the Interior
Bureau of Land Management
California Desert District
22835 Calle San Juan De Los Lagos
Moreno Valley, CA 92553
January 2005
Final Environmental Impact Report and Statement for the
West Mojave Plan
A Habitat Conservation Plan and California Desert Conservation Area Plan Amendment
Vol 1A
Record of Decision – March 2006
* 9.4 million acres
* 6.4 million acres public lands
* BLM Field Offices:
Barstow
Ridgecrest
Needles
Palm Springs


Bureau of Land Management - California
WEMO
within
CDCA

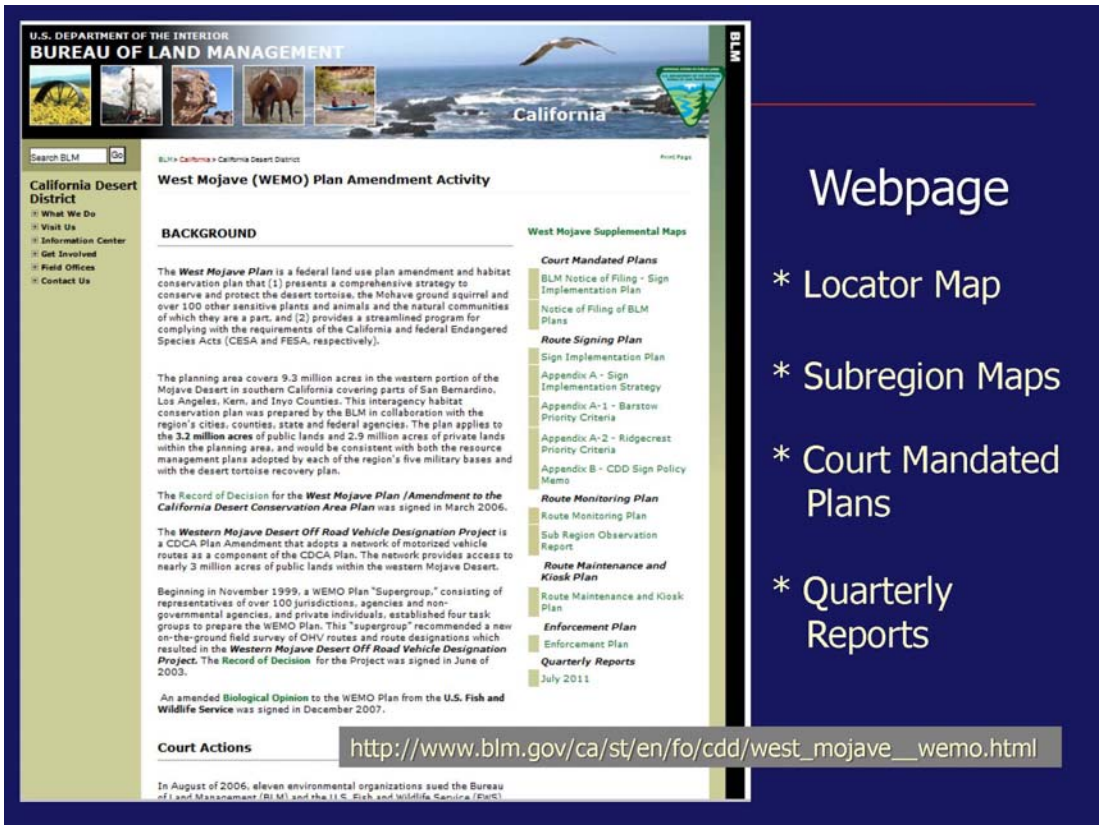

Bureau of Land Management - California
Field Offices
In WEMO
Planning Area
Needles
Ridgecrest
Barstow
Palm Springs

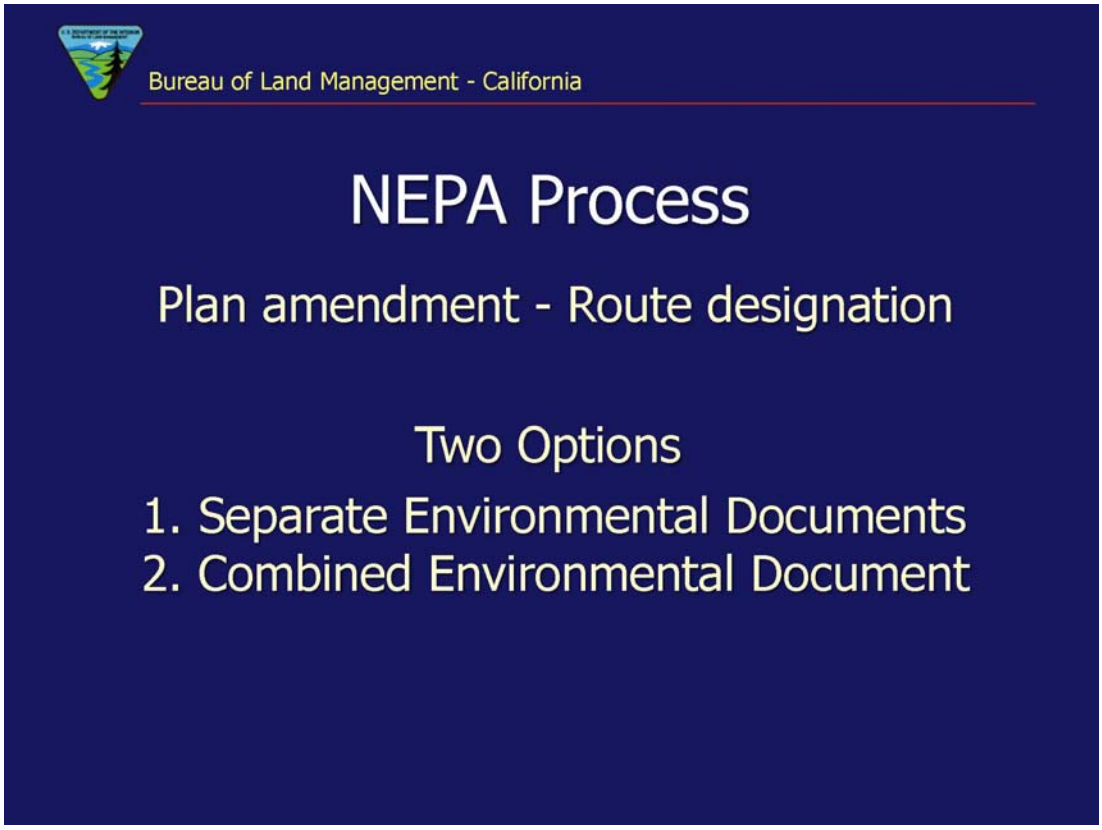

Bureau of Land Management - California
Map Subregions
* Wilderness
Apprx 543,700 acres
* Wilderness Study Areas
Apprx 214,600 acres
Three Rivers
Darwin
Darwin Hills
Sierra
North Searles
Ridgecrest
Owlshead Mountains
Isabella Lake
South Searles
Ridgecrest
El Paso
Jawbone
Red Mountain
Tehachapi
Cuddeback Lake
Soda Mountains
Rands
Black Mountain
Fremont Peak
Coolgardie
Cronese Lake
Afton Canyon
Middle Knob
Harper Lake
Calico Mountains
Iron Mountain
Broadwell Lake
El Mirage
Kramer Hills
Victorville
Newberry Springs
Lancaster
Ord Mountains
Newberry/Rodman
Needles South
Stoddard Valley
Johnson Valley
Juniper Flats
Big Bear Lake
Sheep Hole Mountains
Los Angeles
San Bernardino
Rattlesnake Canyon
Wonder Valley
Morongo Valley
Joshua Tree
Needles South
Palm Springs
Eagle Mountains

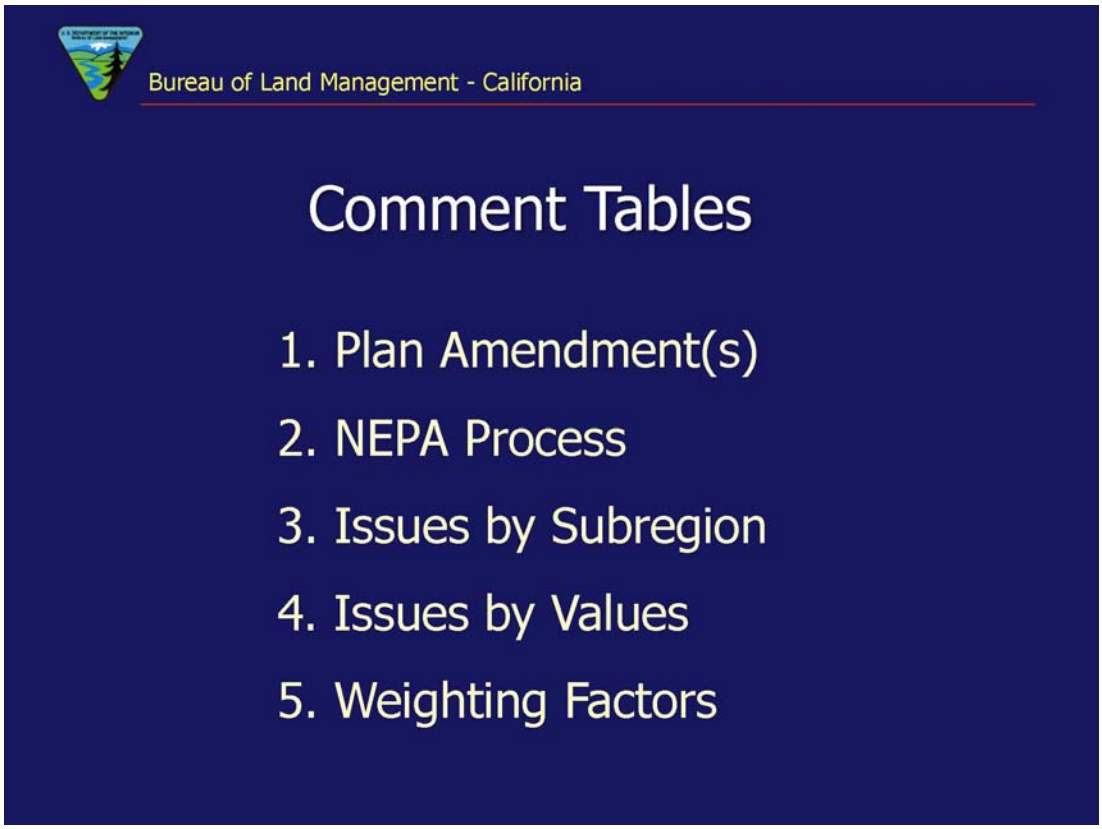

Bureau of Land Management - California
Case3:06-cv-04884-SI Document243 Filed01/29/11 Page1 of 17
IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
CENTER FOR BIOLOGICAL DIVERSITY, Plaintiff, v. US BUREAU OF LAND MANAGEMENT, Defendant.
No. C 06-4884 SI
ORDER RE: REMEDY
United States District Court For the Northern District of California
The Court's September 28, 2009 Order Re: Summary Judgment Motions found that defendants violated the National Environmental Policy Act ("NEPA") and the Federal Land Policy Management Act ("FLPMA") in adopting the March 2006 Western Mojave management plan amendment ("2006 ROD"), but that the defendants did not violate the Endangered Species Act. After unsuccessful settlement talks, the parties agreed to a briefing schedule for determining the appropriate remedy in this matter, including the terms of a vacatur of the decision, the terms of any remand, and any injunctive relief during the remand period. The parties submitted full briefing, including exhibits and declarations in support of their respective positions, and on September 3, 2010, the Court held a hearing on plaintiffs' motion for partial vacatur and injunctive relief. Upon consideration of the voluminous record and the arguments of counsel at the hearing, the Court makes the following findings and enters this Order.
BACKGROUND
In the September 28, 2009 summary judgment order, the Court held that (1) the "decision tree" that the Bureau of Land Management ("BLM") used to designate Off Highway Vehicle ("OHV") routes was flawed because it did not comply with regulations mandating that the BLM consider various
Court Decisions
Order Re:
Summary Judgment Motions
September 28, 2009
Order Re: Remedy
January 28, 2011


Bureau of Land Management - California
Court Mandated Plans
Route Signing Plan
Route Monitoring Plan
Route Maintenance and Kiosk Plan
Enforcement Plan


Bureau of Land Management - California
Plan Implementation
1. Signing – Signing Completed July 28 2011
2. Maps – Subregion Maps Completed and Posted on Website

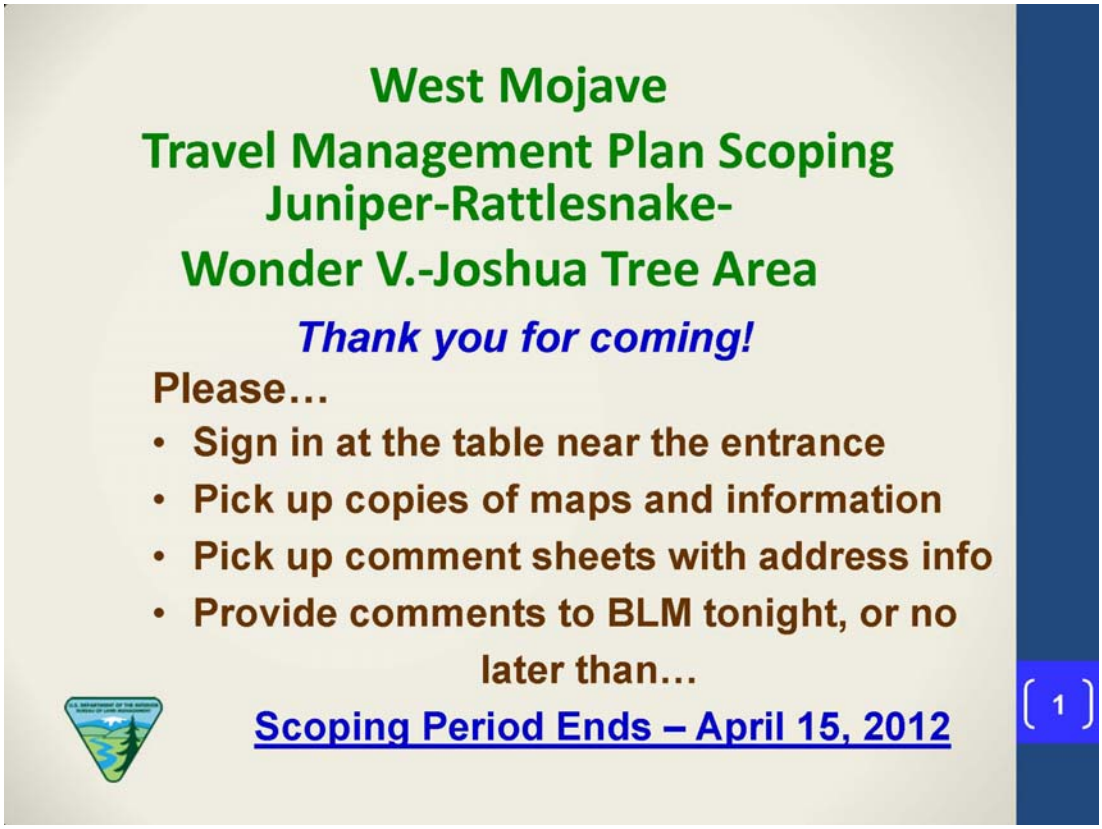

U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
California
BLM
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Go
California Desert District
What We Do
Visit Us
Information Center
Get Involved
Field Offices
Contact Us
West Mojave (WEMO) Plan Amendment Activity
BACKGROUND
The West Mojave Plan is a federal land use plan amendment and habitat conservation plan that (1) presents a comprehensive strategy to conserve and protect the desert tortoise, the Mohave ground squirrel and over 100 other sensitive plants and animals and the natural communities of which they are a part, and (2) provides a streamlined program for complying with the requirements of the California and federal Endangered Species Acts (CESA and FESA, respectively).
The planning area covers 9.3 million acres in the western portion of the Mojave Desert in southern California covering parts of San Bernardino, Los Angeles, Kern, and Inyo Counties. This interagency habitat conservation plan was prepared by the BLM in collaboration with the region's cities, counties, state and federal agencies. The plan applies to the 3.2 million acres of public lands and 2.9 million acres of private lands within the planning area, and would be consistent with both the resource management plans adopted by each of the region's five military bases and with the desert tortoise recovery plan.
The Record of Decision for the West Mojave Plan /Amendment to the California Desert Conservation Area Plan was signed in March 2006.
The Western Mojave Desert Off Road Vehicle Designation Project is a CDCA Plan Amendment that adopts a network of motorized vehicle routes as a component of the CDCA Plan. The network provides access to nearly 3 million acres of public lands within the western Mojave Desert.
Beginning in November 1999, a WEMO Plan "Supergroup," consisting of representatives of over 100 jurisdictions, agencies and non-governmental agencies, and private individuals, established four task groups to prepare the WEMO Plan. This "supergroup" recommended a new on-the-ground field survey of OHV routes and route designations which resulted in the Western Mojave Desert Off Road Vehicle Designation Project. The Record of Decision for the Project was signed in June of 2003.
An amended Biological Opinion to the WEMO Plan from the U.S. Fish and Wildlife Service was signed in December 2007.
Court Actions
In August of 2006, eleven environmental organizations sued the Bureau
West Mojave Supplemental Maps
Court Mandated Plans
BLM Notice of Filing - Sign Implementation Plan
Notice of Filing of BLM Plans
Route Signing Plan
Sign Implementation Plan
Appendix A - Sign Implementation Strategy
Appendix A-1 - Barstow Priority Criteria
Appendix A-2 - Ridgecrest Priority Criteria
Appendix B - CDD Sign Policy Memo
Route Monitoring Plan
Route Monitoring Plan
Sub Region Observation Report
Route Maintenance and Kiosk Plan
Route Maintenance and Kiosk Plan
Enforcement Plan
Enforcement Plan
Quarterly Reports
July 2011
http://www.blm.gov/ca/st/en/fo/cdd/west_mojave__wemo.html
Webpage
* Locator Map
* Subregion Maps
* Court Mandated Plans
* Quarterly Reports


Bureau of Land Management - California
NEPA Process
Plan amendment - Route designation
Two Options
1. Separate Environmental Documents
2. Combined Environmental Document


Bureau of Land Management - California
Comment Tables
1. Plan Amendment(s)
2. NEPA Process
3. Issues by Subregion
4. Issues by Values
5. Weighting Factors

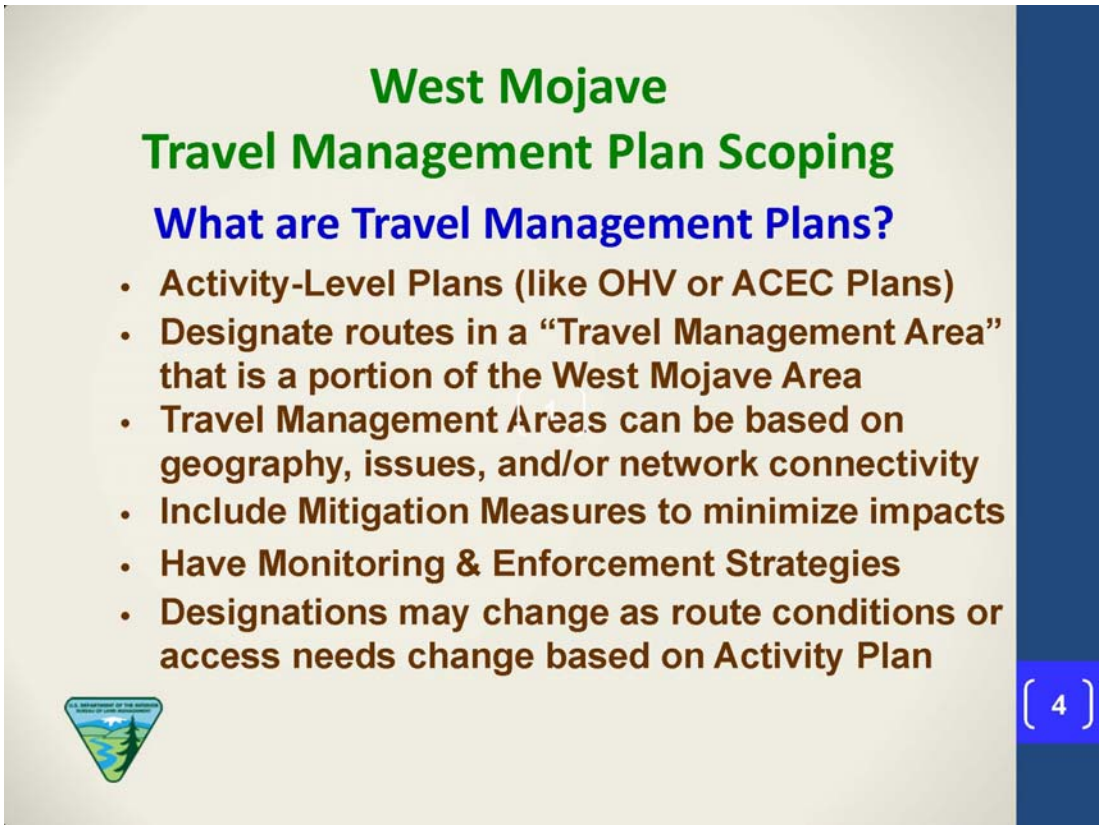

Bureau of Land Management - California
Next Steps
1. Scoping Comments Due October 17, 2011
2. Follow-up Meetings by Subregion
3. Combining Subregions?
Final Decisions Deadline
Court Ordered – March 31, 2014

Scoping Meeting Workshop Presentation – January 26, 2012



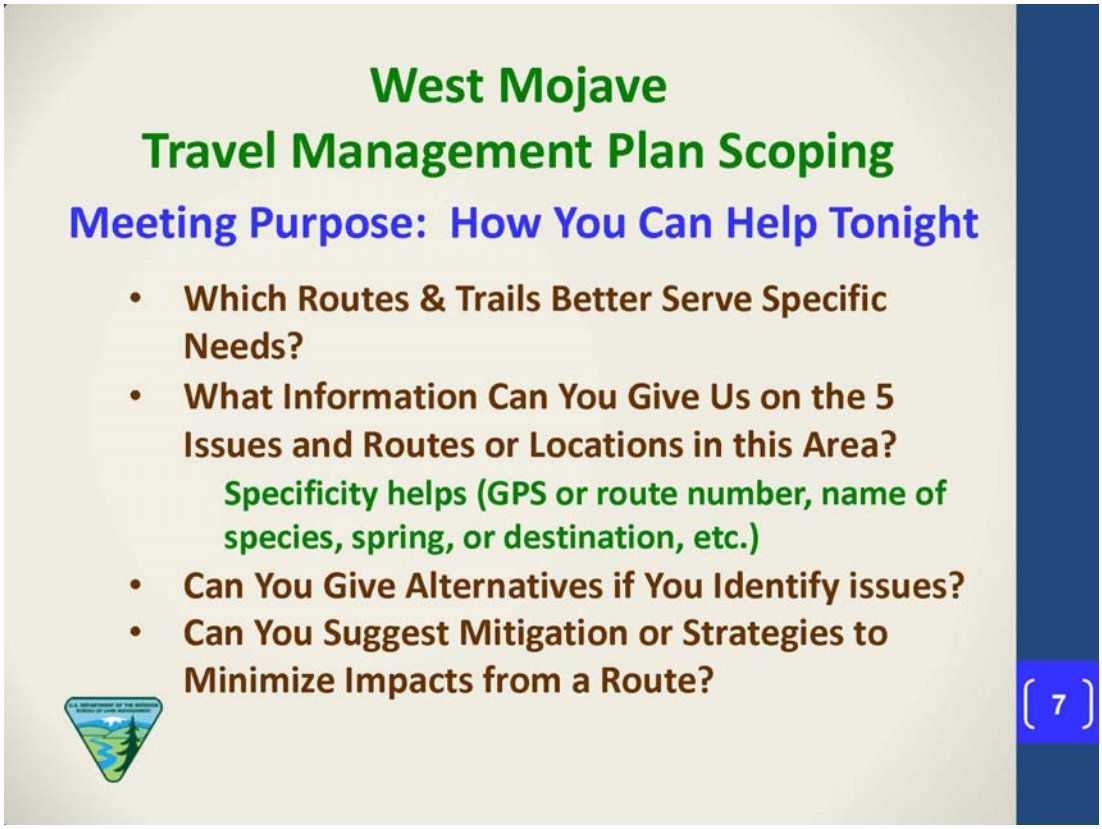

West Mojave
Travel Management Plan Scoping
Presentation Overview
• Project Purpose
• Scope of Travel Management Plans
• Issues to be Addressed
• Scoping and Project Schedule
• Commenting on Routes
• Documenting Information
• Next Steps and Closing Remarks
2


West Mojave
Travel Management Plan Scoping
Project Purpose :
Review & Designate a Route Network and a Viable Implementation Strategy in this area
• Consistent with Route Designation Guidance
• Consistent with Adopted West Mojave Plan
• Address a Range of Recreational and Access Needs, Interests, and Opportunities
• Complement nearby BLM, other Agency and Private Land Needs, Interests, and Opportunities
• Address relevant West Mojave court issues
3


West Mojave
Travel Management Plan Scoping
What are Travel Management Plans?
• Activity-Level Plans (like OHV or ACEC Plans)
• Designate routes in a "Travel Management Area" that is a portion of the West Mojave Area
• Travel Management Areas can be based on geography, issues, and/or network connectivity
• Include Mitigation Measures to minimize impacts
• Have Monitoring & Enforcement Strategies
• Designations may change as route conditions or access needs change based on Activity Plan
4


West Mojave
Travel Management Plan Scoping
Why Travel Management Plans?
• Implementation Tool
• Flexibility
• May Change in Response to Changing Needs and Issues
• Remain Consistent with Goals & Objectives of that travel management planning area
5


West Mojave
Travel Management Plan Scoping
5 Issues BLM Must Address
1. Existing Routes Language, West Mojave Wide
2. How the Required Route Designation Criteria are Applied
3. Expand Range of Alternatives
4. Clarify Baseline Conditions
5. Supplement Documentation or Analyses, and Mitigation Applied for Routes and Network
6


West Mojave
Travel Management Plan Scoping
Meeting Purpose: How You Can Help Tonight
• Which Routes & Trails Better Serve Specific Needs?
• What Information Can You Give Us on the 5 Issues and Routes or Locations in this Area?
Specificity helps (GPS or route number, name of species, spring, or destination, etc.)
• Can You Give Alternatives if You Identify issues?
• Can You Suggest Mitigation or Strategies to Minimize Impacts from a Route?
7

West Mojave
Travel Management Plan Scoping



Subregion Overview Map

Travel Mgt Area 3: Juniper-Rattlesnake-Morongo Valley-Wonder Valley-Joshua Tree

8

West Mojave
Travel Management Plan Scoping
Schedule of Meetings

MTG	SUBREGIONS	LOCATION	MEETING DATE
1	I-15 to I-40: Afton, Broadwell, E. of Barstow	Barstow Field Office	January 9, 2012
2	N. of Ridgecrest: N. Searles, S. Searles, Darwin, Sierra	Kerr-McGee Center, Ridgecrest	January 18, 2012
3	S. and E. of SR 247: Juniper, Rattlesnake, Joshua Tree, Wonder Valley	Barstow Field Office	January 26, 2012
4	Jawbone, Middle Knob, Lancaster	Kerr-McGee Center, Ridgecrest	February 6, 2012
5	N. of I-15/SR 58: DWMA ACEC in Barstow FO (7 Subregions)	Barstow Field Office	February 9, 2012
6	S. of SR 58/W. of I-15: El Mirage, Kramer Hills, Iron Mtn	Barstow Field Office	February 14, 2012
7	Ridgecrest, El Paso, Red Mtn, Rand Mtns	Kerr-McGee Center, Ridgecrest	February 16, 2012
8	S. of I-40/E. of 1-15: Pisgah, Ord Mtn, Newberry-Rodmans, Johnson Valley, Stoddard Valley	Barstow Field Office	February 21, 2012

9


West Mojave
Travel Management Plan Scoping
Meeting Stations: An Aid to Focus Comments
Discuss and Provide Comment on Specific Routes or Locations, & Possible Alternatives
• Needs Satisfied by Specific Routes or Locations
• Types of Recreational Use(s)
• Destination Locations
• Staging or Parking Areas
• Key Corridors
• Other Access Issues
10

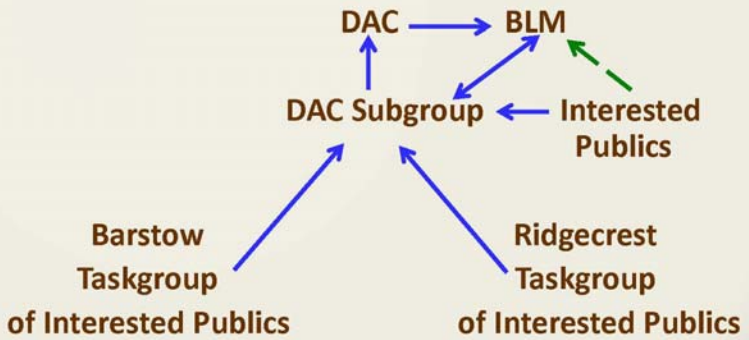

West Mojave
Travel Management Plan Scoping
Comment on Criteria Issues, & Possible Avoidance & Mitigation Options
1. Soil, Water, Air, Cultural Issues
2. Wildlife and Habitat, T&E Species
3. Public Safety, Private Land, Authorized or Non-motorized User Conflicts, and Urban Interface Issues (e.g., Noise)
4. Sensitive/Designated Area (Wilderness, ACEC, OHV) Factors and Related Issues
11

West Mojave
Travel Management Plan Scoping
Recording Public Comments:

- Give Route Number, Location Name, and/or Map Location, if known
- If it is a specific route with no WEMO route #, ask a BLM data steward to get the number
- Indicate if it is a General Issue
- If a Site-Specific Issue, Conflict, or Opportunity, provide Area or Route Details, and why it is an issue
- Alternative, Avoidance or Mitigation Options
- Check Information for Accuracy

12

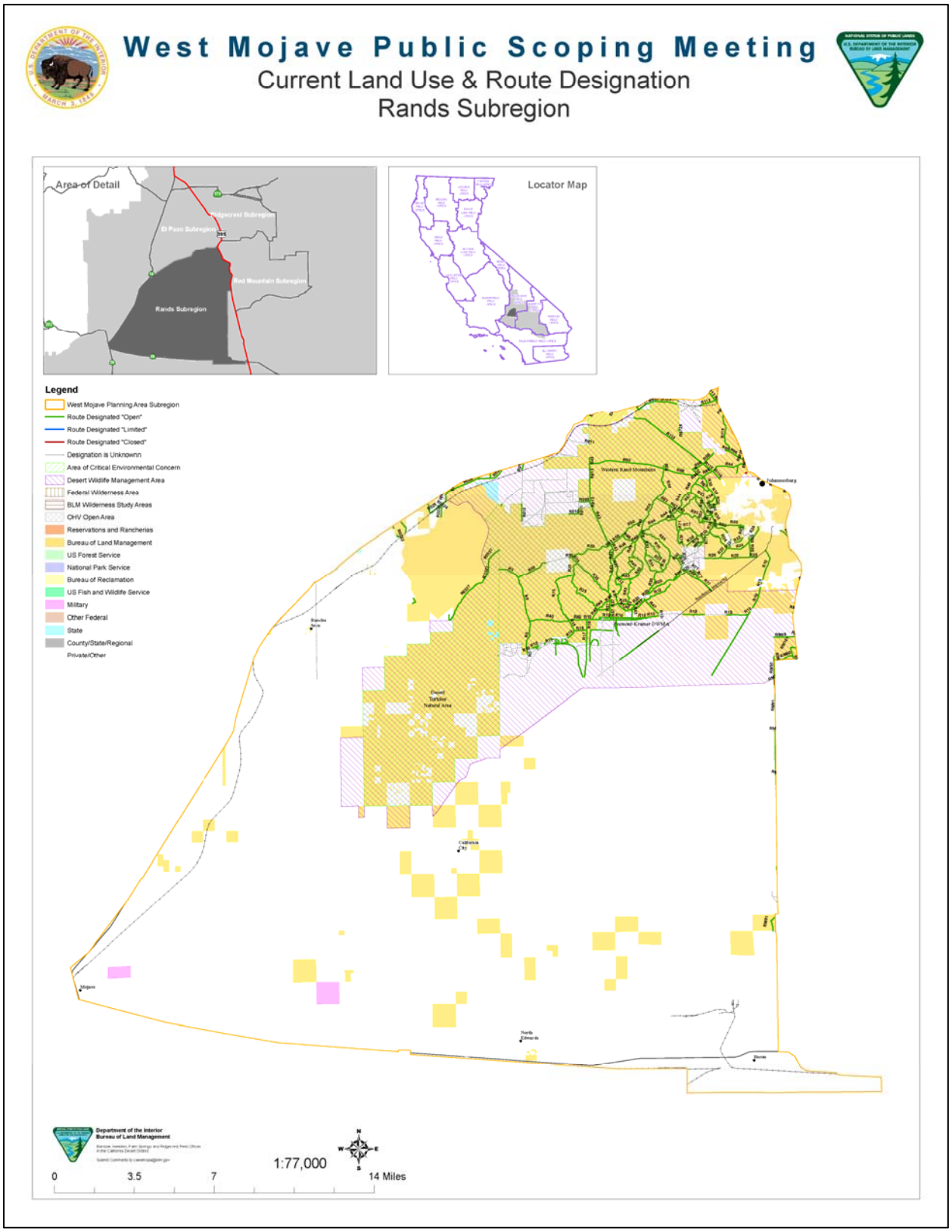
West Mojave
Travel Management Plan Scoping
Desert Advisory Council (DAC)
WEMO Route Network Project Subgroup



13


West Mojave
Travel Management Plan Scoping
Thanks for Your Interest and Comments
• You Can Provide Comments Tonight,
• Send in Comments by April 15, 2012 (mail or website), and
• Attend other scoping meetings to give additional comments,
• The Desert Advisory Council Subgroup will be providing another opportunity for public input
• Draft Travel Mgt Plans due out later this year
Deadline for all Final Plan Decisions
is March 31, 2014
14

Travel Designation Workshop Route Network Map – Rands Subregion



West Mojave Project Comment Form

Bureau of Land Management
Open House Public Meetings
West Mojave Route Designations

COMMENTS

Note: Before including your address, telephone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment, including your personal identifying information, may be made publicly available at any time. While you may ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so. All submissions from individuals identifying themselves as representatives or officials of organizations or businesses will be made available for public inspection in their entirety

Thank you for participating in today's Public Scoping Meeting on the
WEMO Route Designations
Your comments on the scope and focus of the environmental review are encouraged.

Name (please print legibly): _____

Affiliation (if applicable): _____

Phone: _____ Email: _____

Mailing Address: _____

City, State, Zip: _____

CN # ☐ _____
Staff Use

COMMENTS:

Map or Subregion Name and Number _____

Route #, if known _____ **Grid Location** _____ **Point of Interest** _____

General Comment ☐ **Site- or Route-Specific Comment** ☐

What is the Issue/Concern/Opportunity?

_____

_____

_____

Why did you make this Comment and Do you have any additional Suggestions to Address it?

_____

_____

_____

Turn in Comments during this meeting or
Send comments to: West Mojave Route Network Project, Attn: Charlee Christe, WEMO Routes Project Team,
22835 Calle San Juan De Los Lagos, Moreno Valley, CA 92553 or by e-mail at cawemopa@blm.gov

West Mojave Route Network Project

Scoping Report

Appendix C

Scoping Comments

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APPENDIX C
SCOPING COMMENTS

Table C-1 includes all comment documents received by the Bureau of Land Management (BLM) during the scoping period and indicates the assigned document number.

Table C-1. Commenters Listed by Document Number

Document Number	First Name	Last Name	Organization
1001	Kim	Erb	American Lands Access Association; Searchers
1002	Thomas	Egan	The Alliance for Responsible Recreation
1003	Mark	Algazy	No affiliation
1004	Jim	Allen	No affiliation
1005	Donn	Nay	AMA District 37
1006	Ileene	Anderson	Center for Biological Diversity
1007	Ken	Baez	No affiliation
1008	Ty	Bailey	No affiliation
1009	David	Beaumont	Mojave Trails Group
1010	David	Beaumont	Mojave Trails Group
1011	David	Beaumont	Mojave Trails Group
1012	Chuck	Bell	No affiliation
1013	Scott	Spencer	Jawbone Canyon Store trail System Team
1014	Vern	Biehl	No affiliation
1015	H. Marie	Brashear	Society For The Protection and Care of Wildlife
1016	H. Marie	Brashear	Society For The Protection and Care of Wildlife
1017	H. Marie	Brashear	Society For The Protection and Care of Wildlife
1018	Terry	Brown	Stewards of the Sequoia
1019	Dr. Don	Buchanan	No affiliation
1020	Tom	Budlong	No affiliation
1021	Justin	Burleson	No affiliation
1022	John	Steward	California Association of 4 Wheel Drive Clubs
1023	Steve	Egbert	California Association of 4 Wheel Drive Clubs
1024	Jack	Caufield	No affiliation
1025	Ileene	Anderson	Center for Biological Diversity
1026	Michael	Connor	Western Watersheds Project
1027	Amy	Granat	California Off-Road Vehicle Association
1028			Capital Trail Vehicle Association
1029	Ralph	Deckard	No affiliation
1030	Ralph	Deckard	No affiliation
1031	Ralph	Deckard	No affiliation
1032	Michael	DeJohn	No affiliation
1033	Terri	Pencovic	California Department of Transportation
1034	Sid	Silliman	Desert Tortoise Council
1035	Martin	Daugherty	Long Beach Mineral and Gem Society

Table C-1. Commenters Listed by Document Number

Document Number	First Name	Last Name	Organization
1036	Robin	Down	No affiliation
1037	Steven	Dunn	No affiliation
1038	David	Flaker	No affiliation
1039	Almut	Fleck	No affiliation
1040	Leonard	Fox	No affiliation
1041	Edith	Frick	No affiliation
1042	Jenny	Wilder	Friends of Juniper Flats
1043	Robert	Gerber	No affiliation
1044	Kathy	Goss	No affiliation
1045	Kathleen	Goss	No affiliation
1046	Jenny	Wilder	Friends of Juniper Flats
1047	Jenny	Wilder	Friends of Juniper Flats
1048	Jim	Wooddell	No affiliation
1049	Bryan	Widholm	No affiliation
1050	Bryan	Widholm	No affiliation
1051	Charles	Hattendorf	The Friends of Last Chance Canyon
1052	Charles	Hattendorf	The Friends of Last Chance Canyon
1053	Jeri	Heiser	No affiliation
1054	Carlos	Hernandez	No affiliation
1055	Mark	Heuston	No affiliation
1056	John	Hill	VV Gem and Mineral Club
1057	David	Hubbard	Gatzke Dillon & Balance LLP
1058	Brendan	Hughes	No affiliation
1059	Ahmed	Mohsen	Informed Decisions Environmental Solutions
1060	Susan	Cash	Inyo County Board of Directors
1061	Norman	Beze	No affiliation
1062	Karen	Jenson	No affiliation
1063	Robert	Jump	No affiliation
1064	Frank	Keeney	No affiliation
1065	Keith	Axelson	Sageland Ranch
1066	Cyndy	Kelso	No affiliation
1067	Michael	Kemp	High Desert Trail Riders
1068	Tom	Laymon	Desert Tortoise Council, Sierra Club
1069	Bill	Lembright	No affiliation
1070	Chris	Lesso	No affiliation
1071	Will	Liebscher	No affiliation
1072	Todd	Loiselle	No affiliation
1073	Gregor	Losson	No affiliation
1074	Denise	Lupear	No affiliation
1075	Jim	Macey	No affiliation
1076	Ian	MacMillan	South Coast Air Quality Management District

Table C-1. Commenters Listed by Document Number

Document Number	First Name	Last Name	Organization
1077	D.J.	Maginity	No affiliation
1078	Will	Marcy, Jr.	No affiliation
1079	Agustin	Melendez	No affiliation
1080	Kial	Hojnacki	No affiliation
1081	Sophia	Merk	NPL News
1082	Martin	Milas	Prospectors Club of Southern California
1083	Pam	Miller	Bear Valley Springs Horsemen
1084	Julie	Mitchell	No affiliation
1085	Mike	Rath	No affiliation
1086	Barry	Murphy	No affiliation
1087	Sophia	Merk	NPL News
1088	Douglas	Nguyen	No affiliation
1089	Wayne	Nosala	No affiliation
1090	Tim	Nowak	No affiliation
1091	Chester	Nowicki	Treasure Seekers of San Diego County
1092	Todd	Ockert	No affiliation
1093	Edwin	Oh	No affiliation
1094	Daphne	Green	CA Dept. of Parks and Recreation OHMVR Division
1095	Doug	Parham	Landowners Association Western San Bernardino County
1096	Doug	Parham	Landowners Association Western San Bernardino County
1097	Paul	Pearson	Wonder Valley
1098	Minki	Peterson	No affiliation
1099	Phil	Pulley	Ojai Valley Dirt Riders
1100	Clayton	Miller	Recreational Access Council of California
1101	Mesonika	Piecuch	ORV Watch Kern County
1102	Mark	Raiche	No affiliation
1103	Robert	Reynolds	No affiliation
1104	Shane	Rucker	No affiliation
1105	Shane	Rucker	No affiliation
1106	Ron	Schiller	High Desert Multiple Use Coalition
1107	Tom	Shackelford	No affiliation
1108	Steve	Scheftel	No affiliation
1109	Patrick	Shreffler	No affiliation
1110	B.A.	Skipper	No affiliation
1111	Randy	Banis	DAC
1112	Ron	Schiller	No affiliation
1113	Vince	Eyre	Team True Racing
1114	Mary	Grimsley	Gear Grinders 4WD Club
1115	W	Maddux	Gear Grinders 4WD Club
1116	Sophia	Merk	NPL News
1117	Jerry	Counts	No affiliation

Table C-1. Commenters Listed by Document Number

Document Number	First Name	Last Name	Organization
1118	Kathy		No affiliation
1119	James	Kenney	No affiliation
1120	Bill	Maddux	WEMO Subgroup
1121	Jim	Wilson	Lost Coyotes
1122	Jay	Young	Team True Racing
1123	Clayton	Miller	No affiliation
1124	Jana	Ostler	No affiliation
1125	Joe	Conway	No affiliation
1126	Don	Decker	No affiliation
1127	Gregory	Elwood	No affiliation
1128	Greg	Oberst	No affiliation
1129	Randel	Paulsen	No affiliation
1130	Sleepy Bear Mining LLC		Sleepy Bear Mining LLC
1131	Carl	Zorzi	No affiliation
1132	David	Whistler	No affiliation
1133	Allen	Wensman	No affiliation
1134	Edward	Waldheim	CORVA
1135	James	Van Sickle	No affiliation
1136	John	Tucker	No affiliation
1137	Rick	Townsend	No affiliation
1138	Bill	Tomlinson	No affiliation
1139	La Vella	Tomlinson	No affiliation
1140	Ross	Termin	No affiliation
1141	Dean	Sweet	No affiliation
1142	Robert	Strub	No affiliation
1143	Jack	Stone	No affiliation
1144	Douglas	Parham	Landowners Association Western San Bernardino County
1145	Earl	Wilson	China Lake Astro Society
1146	James	Kenney	No affiliation
1147	Dowal	Zorzi	No affiliation
1148	Randy	Banis	DAC
1149	Chuck	Bell	Ord. Mt. Cattle Allotment
1150	William	Brock	Lone Wolf Colony
1151	Susan	Carlton	SNEI
1152	Eyre	Vince	Team True Racing
1153	Betty	Munson	Johnson Valley Improvement Association
1154	Judy	Qualm	High Desert Gold Diggers
1155	Ken	Schulte	No affiliation
1156	Rick	Sebo	CORVA
1157	Jerry	Counts	No affiliation
1158	Karl	Zellner	Indian Wells Valley Gem and Mineral Society

Table C-1. Commenters Listed by Document Number

Document Number	First Name	Last Name	Organization
1159	Gregon	Losson	No affiliation
1160	Jim	Wilson	Lost Coyotes
1161	Deveree	Kopp	USFS San Bernardino National Forest
1162	Anonymous	Anonymous	No affiliation
1163	Edward	Waldheim	No affiliation
1164	Edward	Waldheim	No affiliation
1165	M.J.	Treece	No affiliation
1166	Tyler	Hunter	No affiliation
1167	Allyson	Hyfill	No affiliation
1168	Melanie	Hyfill	No affiliation
1169	William	Hyfill	No affiliation
1170	Jammie	Bratton	No affiliation
1171	Len	Fox	No affiliation
1172	Lisa	Gage	No affiliation
1173	Robert	Gage	No affiliation
1174	Tony	Nardi	No affiliation
1175	Tony	McNeal	No affiliation
1176	Cutis	Melton	No affiliation
1177	Craig	Weisman	No affiliation
1178	Deanna	Marsh	No affiliation
1179	Donna	Schrank	No affiliation
1180	Ted	Beauregard	No affiliation
1181	Scott	Garrett	No affiliation
1182	Thomas	Larson	AMA Life Member
1183	Robert	Krattiger	No affiliation
1184	Mark	Edwards	No affiliation
1185	Shawn	Gallagher	No affiliation
1186	Ted	Dykman	No affiliation
1187	Alan	Gosselin	No affiliation
1188	Ali	White	No affiliation
1189	Scott	Spencer	Jawbone Canyon Store
1190	Scott	Spencer	Jawbone Canyon Store
1191	Tamara	Candill	No affiliation
1192	K	McNeal	No affiliation
1193	Jennifer	Kearney	No affiliation
1194	Tori	Garza	No affiliation
1195	Jennifer	Seeder	No affiliation
1196	Brian	Soriano	No affiliation
1197	JoAnn	Holguin	No affiliation
1198	Jeff	Walters	No affiliation
1199	Morgan	LaRock	No affiliation

Table C-1. Commenters Listed by Document Number

Document Number	First Name	Last Name	Organization
1200	Kevin	Ford	No affiliation
1201	Merrill	Smith	No affiliation
1202	Rich	Souza	No affiliation
1203	Colyer	Gould	No affiliation
1204	Jesse	Mead	No affiliation
1205	Gayle	Jackson	No affiliation
1206	Brent	Jackson	No affiliation
1207	James	Sweet	No affiliation
1208	Raymond	Hapeman	No affiliation
1209	Robert	Taylor	No affiliation
1210	Scott	Taylor	No affiliation
1211	Jack	Violante	No affiliation
1212	Kirby	Nelson	No affiliation
1213	Shawn	Monahan	No affiliation
1214	Benjamin	Cooper	No affiliation
1215	Mason	Marquez	No affiliation
1216	James	Sigman	No affiliation
1217	Christopher	Baurer	No affiliation
1218	Allen	Mowry	No affiliation
1219	Jim	Wilson	No affiliation
1220	Ben	Acuna	No affiliation
1221	Michael	Schwager	No affiliation
1222	Mario	Salice	No affiliation
1223	Rusty	Phillips	No affiliation
1224	Jon	Sudtell	No affiliation
1225	Michelle	Hopkins	No affiliation
1226	Sandra	Bilewitch	No affiliation
1227	Daniel	Seeder	No affiliation
1228	Fred	Steele	No affiliation
1229	Mark	Lawless	No affiliation
1230	Kurt	Lowe	No affiliation
1231	Vincent	Trino	Dirt Diggers MC
1232	Rayven	Noriega	No affiliation
1233	Ray	Noriega	No affiliation
1234	Craig	Friesen	No affiliation
1235	Ron	Pilling	AMA / Former D-37 Desert
1236	Brian	Chatterton	No affiliation
1237	Roger	Carender	No affiliation
1238	Mike	Galaz	No affiliation
1239	Sid	Williams	No affiliation
1240	Michelle	Schoneman	No affiliation

Table C-1. Commenters Listed by Document Number

Document Number	First Name	Last Name	Organization
1241	John	Sherman	No affiliation
1242	Rick	Lundin	Checkers MC
1243	Ron	Wachter	No affiliation
1244	Tabatha	Scheinost	No affiliation
1245	Missy	Seeder	No affiliation
1246	Anthony	Salagado	No affiliation
1247	Edward	Waldheim	Friends of Jawbone
1248	Jay	Young	USDR, Team True Racing, D37
1249	Stephanie	Weigel	No affiliation
1250	Carol	Wiley	Sierra Club
1251	Jill	Bays	Transition Habitat Conservancy
1252	Mesonika	Piecuch	ORV Watch Kern County
1253	Lee	Jesmain	No affiliation
1254	Robert	Reynolds	No affiliation
1255	Everett	Lindsay	University of Arizona
1256	James	Wilson	Lost Coyotes
1257	Marie	Brashear	No affiliation
1258	Ron	Kauffman	Hi Desert Gold Diggers
1259	Jack	Strayhorn	No affiliation
1260	Robert	Reynolds	No affiliation
1261	Don	Buchanan	San Bernardino Valley College
1262	Greg	Oberst	No affiliation
1263	Marilyn	Nitz	Palo Verdes Gem and Mineral Society
1264	Marilyn	Nitz	Palo Verdes Gem and Mineral Society
1265	William	Mitchell	No affiliation
1266	Douglas	Close	Palo Verdes Gem and Mineral Society
1267	Mary	Kotschwar	Desert Tortoise Preserve Committee Inc.
1268	Elaine	Cornish	No affiliation
1269	Judith	Qualm	High Desert Gold Diggers
1270	Kathy	Goss	No affiliation
1271	Mark	Heuston	No affiliation
1272	Julie	Hendrix	No affiliation
1273	Judith	Greenburgh	No affiliation
1274	Myriam	Lemarchand	No affiliation
1275	Chris	West	No affiliation
1276	Pierre	Valeille	No affiliation
1277	Kathy	Goss	No affiliation
1278	Earl	Wilson	China Lake Astro Society
1279	Kathy	Davis	No affiliation
1280	Jim	Wilson	Lost Coyotes
1281	Jack	Stone	Project Darwin LLC

Table C-1. Commenters Listed by Document Number

Document Number	First Name	Last Name	Organization
1282	Jerry	Thompson	No affiliation
1283	Leila	Pendergast	No affiliation
1284	D'Anne	Albers	Community ORV Watch Steering Committee
1285	Carmen	Groff	No affiliation
1286	Wes	Torgerson	No affiliation
1287	Kim	Erb	American Lands Access Association; Searchers
1288	Greg	Hoffman	San Bernardino National Forest
1289	Diane	Noda	U.S. Fish and Wildlife Service
1290	Tom	Budlong	No affiliation
1291	John	Gilkerson	No affiliation
1292	Mesonika	Piecuch	ORV Watch Kern County
1293	Cathy	Armstrong	No affiliation
1294	Janie	Walters	No affiliation
1295	Mark	Algazy	No affiliation
1296	H. Marie	Brashear	No affiliation
1297	Sophie	Merk	No affiliation

Table C-2 includes the comment document number and each comment made during scoping, reproduced as they were received by the BLM and organized by comment category. To identify the name of the person and/or organization who submitted a comment, locate the corresponding document number in Table C-1.

Table C-2. Scoping Comments by Comment Category

Document Number	Comment Text
NEPA Process	
1001	The maps provided by the BLM at the public meetings did not list important landmarks and road names that are necessary for the public to be able to identify on those maps the routes and areas of importance to them and regarding which they would like to provide comments. In addition, the scale of the maps was inconsistent and frequently such that one could not find the locations they sought to locate on the maps. For these reasons, the information provided in connection with the WEMO route plan is inadequate and insufficient and therefore non-compliant with NEPA. More detailed maps of reasonable scale with easily identifiable landmarks, roads and boundaries should be provided to the public to allow sufficient information for the public to be able to comment on this matter.
1001	The public meeting format utilized for this process does not allow for verbal comments that are on the record, and does not encourage open discussion, exchange and comments. In addition, the meetings were held at great distance from most of the geographic areas affected and the greatest numbers of the public who use the public lands that are the subject of this process. For these reasons, they did not meet the requirements of NEPA. The BLM should hold public meetings that provide time for verbal comments on the record by the public in order to properly satisfy NEPA requirements.
1002	While minor modifications "must be documented in the official record" (BLM 2005a), the public is likely to be inadequately informed of any route change BLM cares to implement using this approach. In controversial route designation changes, use of this approach simply cannot be construed as a management plan being "maintained as necessary to reflect minor changes in data" (FLPMA Section 1610.5-4). Such an approach does not disclose information on a potentially controversial agency decision, nor does it constitute close coordination with the public. Consequently, it specifically conflicts with direction outlined in the Motorized Vehicle Access Element of the CDCA Plan. The expressed allowance for "minor modifications" in the WEMO Plan FEIS also certainly does not further the transparency of federal

Table C-2. Scoping Comments by Comment Category

Document Number	Comment Text
	agency processes, as mandated by the Open Government Directive (OMB 2009).
1002	No opportunity for public involvement was provided relative to the above "minor modifications", nor was there any disclosure to the public about decision rationale. In another instance of "minor modifications", route numbering system changes have been applied in the El Mirage, Ord and Juniper subregions following adoption of the WEMO Plan. These changes make it extremely difficult to track WEMO Plan decisions and rationale applied in designating individual routes. No "crosswalks" or other means of informing the public about how these numbering changes tie back to WEMO Plan have been disclosed. The public has not been informed if/where any other "minor modifications" have been made since WEMO Plan adoption.
1002	All citizens, including special interests, private landowners and local governments, should be provided an equal opportunity to participate in route designation and vehicle use management programs.
1002	Per the WEMO record, very little outreach or coordination with non-motorized users occurred to ensure conflicts between motorized and non-motorized uses were minimized.
1002	Areas of mixed and/or checkerboard land ownership are difficult to address in a route designation process, or to adequately manage following the adoption of a vehicle route network. Whereas the BLM is required to provide basic vehicle access to public lands, the agency faces a daunting task in not promoting vehicle trespass on interspersed or adjacent private lands. It is incumbent upon BLM to coordinate closely with affected private land owners early in the route designation process; rather than belatedly consider private property owner concerns only through the short protest time period following such planning efforts. Quite simply, private landowners should be consulted prior to BLM designating open routes to the edge of private property or posting signs/kiosks on private land. Acting as a good neighbor should be a paramount consideration in route designation planning efforts. Further, where vehicle access to or across private lands is denied by a landowner, any routes promoting trespass should be closed and effectively rehabilitated by BLM in a timely manner.
1005	D37 encourages the BLM to use this period of mandated reanalysis to incorporate a more accurate picture of OHV usage in WEMO, and use site-specific information to designate trails that were not included in the original plan, citing public need and the need to lessen on the-ground impacts as one of the criteria for designation. Rather than look at this court mandated process as onerous or difficult, the agency can take advantage of the wealth of knowledgeable enthusiasts willing to participate in process. Using stakeholders as a resource will enable the agency to produce a well-balanced plan more likely to stand up to legal scrutiny. It is only by using the accurate information and site-specific analysis that the BLM can hope to have a plan that stands up to the public needs, court mandates and NEPA requirements.
1006	The NEP A analysis should be contained in a single Environmental Impact Statement (EIS) that addresses all of the issues that need to be addressed by BLM during the remand-- not just route designation. For example, BLM should also include in the analysis updated information regarding air quality, potential impacts to plants and animals currently under Endangered Species Act protections, impacts to soils, air quality, water resources, riparian areas, UP As, and other resources of the CDCA as well as additive and cumulative impacts to these species from other threats.
1006	The BLM cannot adequately address the impacts of route designation in the West Mojave planning area of the CDCA by segmenting the analysis for example by looking at route designation alone in isolation from grazing, industrial scale development of renewable energy, or other threats to species and habitats.
1012	The process must include stakeholder participation – with every option "on the table"
1015	BLM has confused the public as to the correct date on which the scoping comment period ends. The notice in the Federal Register states the end date as October 13, 2011. At the public meeting in Ridgecrest it was announced that the ending date was October 17, 2011.
1015	NEPA requires that all relevant data be available to the public. Numerous documents are mentioned as available at BLM Moreno Valley and Sacramento, California only. Not all the public or even a significant portion of those wishing to comment can get to Moreno Valley or Sacramento, California. These documents should be posted on the BLM WEMO website.
1016	The BLM needs to complete an EIS for each of the sub-regions, not a planned EA. The BLM should not plan to complete only an EA for each sub-sub-region either. Issues in each sub-region and sub-sub-region, other

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	than route designation and which may impact route designation, are different and must be examined in their entirety.
1016	BLM's plan to make the WEMO route designation/Travel Management Plan(s) so adaptive that they can close a road or open a road without public participation would violate FLPMA and NEPA as well as the CDCA Plan's commitment to the public for an open and transparent decision making process. The Society believes that at a minimum an EA, with Federal Register notice, must be utilized to close or open a route. The WEMO amendment must include a process to add, open, limit, or close a route.
1016	Within the WEMO area there are multiple counties which have asserted their RS2477 rights of way. The Society has been told by BLM that they are negotiating to resolve this issue. However, I cannot find anyone in any county who can tell me about these negotiations. Again, the public has not been given all the information needed to make recommendations and this is another violation of NEPA.
1016	None of these sub-region meetings qualified as "scoping" within NEPA guidelines. Each sub-region still requires the holding of a scoping meeting because the issues are significantly complex and differ within each sub-region. The BLM has not given the public its reasoning behind the grouping of sub-sub-region and sub-region groupings.
1016	The information provided by BLM changed meeting to meeting. However, none of this BLM information related in any way to the individuality of each sub-sub-region or subregion except for a request for roads which people thought should be retained or closed and why this was so. At each meeting the information provided by BLM became more complete as to BLM's procedures with respect to adding or deleting routes to the process. At NO meeting were all members of the public able to provide to BLM, routes they wanted included as open or closed.
1016	The maps initially provided by BLM were and are not useable. The scale of the maps changes map to map. No features were identified. Roads are not shown and roads which do not exist are shown. Even people familiar with the 33 sub-sub-regions could not identify which roads were which. There was one person who attended most of the "scoping/open houses" and at the end of the eighth meeting still had not been able to provide the GIS technicians with roads he was concerned about.
1017	The footprint created by future projects in the CDCA will further fragment the existing road and trail system by severing existing routes of travel thus excluding the public from the areas within project boundaries and the lands near by. The EIS must look at and the final document must amend the Vehicle Access Element to provide that each future project shall provide environmental analysis for however many work-arounds as are necessary to reconnect the severed access.
1017	It is difficult to provide scoping comments when the BLM has not selected how it wants to do things under NEPA or FLPMA and the public is provided with no clear idea but is left to look at a mishmash of thoughts. Clearly the BLM wants to amend the motorized vehicle access element of the CDCA plan and the court has ordered a redo of route designation. Beyond that nothing is evident. It appears that the BLM also wants to amend other portions of the CDCA Plan WEMO amendment, but it is not exactly clear as to where, when, which, how, etc. and therefore is a violation of NEPA process.
1017	The U. S. Department of Energy and BLM and DRECP, Renewable Energy plans must be integrated into the route designation and amendment processes.
1017	The West Mojave Desert Off Road Vehicle Designation Project book indicates that the Sub-Regions do not match. The Notice and the new BLM maps show us 33 sub-regions. The old Off Road Vehicle Designation Project had 20 subregions. This kind of deception adds to the public's confusion and makes it impossible to comment in an informed manner as required by NEPA.

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1017	NEPA requires that all relevant data be available to the public. Numerous documents are mentioned as available at BLM Moreno Valley and Sacramento, California only. Not all the public or even a significant portion of those wishing to comment can get to Moreno Valley or Sacramento, California. These documents should be posted on the BLM WEMO website.
1017	NEPA requires more specificity be provided to the public from whom scoping comments are sought therefore this scoping process is significantly flawed.
1024	The meeting locations are completely inadequate for the public to attend when the area includes parts of three counties! Meetings should at a minimum be in each of the counties and in populated areas.
1026	Unfortunately, neither the news release nor the CDDC website explains the relationship between the planning for these eight TMAs and the previously announced (September 13, 2011 Federal Register) EIS/Proposed Plan Amendment for the West Mojave. Nor is there an explanation for how the areas within these eight TMAs were determined. Nor is there an explanation as to why the BLM will be preparing eight EAs rather than a single EIS. Because there is no cumulative effects analysis to tier off, producing eight separate EAs seems a problematic approach that will result in much additional work for the BLM and may result in the BLM (or the courts) concluding that an EIS is required. The BLM must clearly explain to the public what it is trying to do.
1026	Because of the extent of motorized recreational activities in these desert lands and the inherent conflicts with multiple sensitive resources, the BLM should immediately initiate the preparation of the required EIS.
1026	The current route designation effort on the 3.2 million acre West Mojave planning area has been driven by the BLM's prior failure to prepare an EIS for the original WEMO Route Designation process and the ensuing lawsuits. Given that the BLM is now soliciting suggestions for the designation process and for decision criteria for the route designation process that 5 years ago it claimed it had completed whatever action the BLM takes in this process, including "no action", it will clearly be considered "highly controversial" by stakeholder groups, by the general public, and by the courts. In addition to the public controversy there is considerable scientific controversy given the uncertain effects of climate change on desert habitat and resources, and the vagaries of the ever-evolving state and federal energy policies.
1026	BLM has been compelled by the courts to complete this process within a certain period of time. Unfortunately, there are other major planning efforts such as the DRECP and the Solar PEIS that are currently underway that will have significant cumulative effects on many of the same resources that are impacted by the outcome of this route designation process. Thus, the cumulative effect of route designation and these other projects and planning efforts is highly uncertain. The BLM should immediately initiate the preparation of the required EIS.
1026	The planning area is rich in significant scientific, cultural, and historical resources. Existing routes pass through cultural sites and even National Register sites. There is additional uncertainty because much of the planning area has yet to be surveyed. Given the extent of the existing route network, the BLM's action will have adverse effects on some cultural resources. For this reason BLM should immediately initiate the preparation of the required EIS.
1026	Much of the planning area is habitat for the state and federal threatened desert tortoise. A considerable amount of the area is also designated as desert tortoise critical habitat. There are other critical habitats and listed species within the planning area. The BLM's action in this project will affect the desert tortoise and other listed species and may adversely modify critical habitat. For this reason BLM should immediately initiate the preparation of the required EIS.
1026	The BLM needs to clarify what additional NEPA analysis and planning efforts it will be proposing to address the other deficiencies in the 2006 Plan so that the public can be fully informed and to provide the context for meaningful public input and for meaningful analysis of the effects of any proposed actions.
1028	We request that this planning project include adequate research of the county records and adequate formal consultation and coordination with the county to get their input on RS 2477 routes.
1034	Third, because amendment of the WEMO area plan carries implications for the Federally-threatened desert tortoise as well as other special status species, the BLM should prepare an environmental impact statement rather than an environmental assessment. The anticipated level of impacts of route designations warrant a full environmental review.
1037	The complexities of planning efforts within the WEMO region require that this Proposed Action be conducted as a full Environmental Impact Statement taking into account all existing and

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	proposed planning efforts within the region.
1045	The current process certainly needs to be done as an EIS, with the presentation of a range of options for designating routes in the WEMO area. Also, as a resident of Darwin, I am very concerned that decisions might be made by administrative and staff people who are not familiar with the many uses that are served by the roads in my area. Only local residents are aware of the present and contemplated future needs for these routes, and they should have the opportunity to provide input in a meaningful way.
1045	In Southern Inyo County, we have had little opportunity to participate in readily accessible meetings or have access to materials that are apparently not available on line. If the NEPA process is being followed, every step should be transparent and involve public participation. The only way to ensure these desirable goals is to implement a full EIS.
1046	the maps available to the public have been inadequate.
1046	It is important for people to be given the opportunity to comment at public meetings and have their comments recorded at the scoping meetings. Please provide a public comment period in all future public scoping meetings.
1047	One area in particular is the Juniper Sub Region. It contains a cattle allotment, a historic and scenic road from the valley to the mountains, numerous scenic vistas, the Juniper Flats ACEC, probably 2 active mine claims and numerous old mine shafts and quarries (not restored or cleaned up), numerous target shooting areas with trash, sensitive species and their habitats, numerous springs and seeps as well as blue line streams, newly approved wind energy testing sites, several ranches (occupied and some historic) and residences, thin granatic soils that are easily eroded (and several old hill climbs that are now down to bare rock from erosion), transmission line and other rights of way, a long history of equestrian and hiking recreation (but no designated paths), designation in 2006 of motorcycle only trails, and a boundary on the south with a non-motorized zone in the San Bernardino National Forest along Deep Creek which is a proposed Wild and Scenic River. None of this is on the map for the Juniper Sub Region given out at the public meetings and found on the BLM website: http://www.blrn.gov/ca/stJenifo/cdd/west mOJave wemo/wemo maps.html
1055	Public Outreach The public must become aware of the WEMO process and how they can contribute their comments. The BLM must come to the Morongo Basin and hold workshops on how the public can contribute their views on route designations and present evidence regarding the impacts of ORVs on our communities. Residents need to be assured that the meetings will be held in such a manner as to discourage harassment and retaliation from elements of the ORV riding community who attack those with whom they disagree. In the past, this harassment has included cyberstalking, vandalism of private property and physical confrontation. At the public meetings, the BLM should indicate that federal law enforcement will not tolerate such abuse and will aggressively investigate any complaints of retaliation.
1060	Plan is inconsistent with the Inyo County General Plan. Ideally the Bureau of Land Management (BLM) would have reviewed our Plans and initiated coordination, but has not contacted us. We therefore request coordination with the BLM to address and resolve the inconsistencies between the WEMO plan and the Inyo County General Plan and approved policies. In accordance with 43 C.F.R. 1610.3-1(1), Inyo County hereby informs the BLM of the inconsistencies between Inyo County plans and policies and the WEMO plan. The County requests staff-to-staff meetings to address these inconsistencies and, ideally, to resolve them.
1071	would ask the powers that be, who are tasked with managing this area, to look for qualified sources. Residents who do ORV recreation in 4WD, Buggies, and street and dirt bikes. Seek them out here, look in their driveways and garages. Find them doing what the ORV visitors are doing. Look at their backgrounds and experience and hobbies. Seek local people out who own/live in, strategic locations. Ask others for referrals. Find good sources of info and listen to them. I
1081	The purpose of an EA is to determine if an EIS is warranted. After eight meetings and over 3 million acres of lands affected, it is clear that the proposed action warrants an EIS.
1081	1. None of these sub-region meetings qualify as “scoping” under NEPA regulations (at 40 CFR 1500).
1081	The information and presentations provided by BLM has changed from meeting to meeting. However, none of this BLM information related in any way to the individuality of each sub-sub-region or sub-region - except for a request for roads which people thought should be retained or closed and why this was so.
1081	The public was confused at each meeting because the information kept changing. As the meetings went on, the BLM was able to explain the process with respect to adding or deleting routes to the process. At no meeting were all members of the public able to provide to the BLM, the routes they wanted included as open or closed.

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1081	For example: The first of the eight meetings was a disaster. People came to provide road information and were denied. The GIS technician informed the group that there was no way in which the public could provide information in any form that would be useable by her. By the last of the eight meetings this had modified into showing her on a map and if she could find it on her base, it would find its way into the system.
1081	In the first three meetings, there was no mention of a Task Group. In the first two meetings, there was no mention of a Sub Group of the DAC appointing a Sub Group. The timing of this announcement is crucial since the folks who attended the 1st two meetings did not get that information. This is very important since it impacts how they are to provide comments.
1081	The maps initially provided by BLM are not useless. The scale of the maps provided changed from map to map. No features were identified. Even people familiar with the sub-sub-regions could not identify which roads were which. There was one person who attended most of the "scoping/open houses" and at the end of the eighth meeting still had not been able to provide the GIS technicians with roads he was concerned about.
1081	The public does not have access to this information regarding the botanical, archaeological and biological information and cannot determine what has been completed for each road and have a problem determining how complete the BLM's original documentation was done or how well the BLM's documentation is progressing now. Federal Laws prevent the public's access to sensitive portions of this information. This makes it very hard for the public to make informed comment on which roads should remain as designated, closed or opened which is another violation of NEPA, as all needed information is not available to the public.
1085	having these meetings mid-week is an easy way to make sure that the general majority public will not be able to attend,unless they live in ridgecrest or inyokern. the vast majority of the public that use these routes do not live in ridgecrest or inyokern, may I suggest that these meetings be held on saturday,so a more realistic representation of the general public would be able to attend. remember that the blm. works for the people of california, not a select few that do not truly represent the majority of the public
1087	It appears that BLM is segmenting NEPA when it knows that it has to do further NEPA compliance but is choosing to complete an EA not a Programmatic EIS.
1087	The Notice of Intent in the Department of Interior (DOI) by the Bureau of Land Management (BLM) does not state whether it is to be an Environmental Assessment (EA) nor an Environmental Impact Statement as needed to amend the Vehicular aspect of West Mojave Plan. It also alludes that other amendments will be forth coming, however it does not state what they are and if their intent will negate this process.
1087	Predetermined outcomes violate the intent of NEPA. While the judge ordered some specific criteria, and outcomes the BLM has listed numerous issues, which may not be included by the public. We see this as an attempt to direct the public to a predetermined outcome.
1087	The footprint created by future projects in the CDCA will further fragment the existing road and trail system by severing existing routes of travel thus excluding the public from the acres within project boundaries and the lands near by. The Programmatic EIS must amend the Vehicle Access Element to provide that each future project shall provide specific environmental analysis to reconnect the severed access.
1087	The notice in the Federal Register states the end date as October 13, 2011. At the public meeting held in Ridgecrest and Barstow, it was announced that the ending date was October 17, 2011.
1087	NEPA requires that all relevant data be available to the public. Numerous documents are mentioned as available at BLM Moreno Valley and Sacramento only. Not all the public or even a significant portion of those wishing to comment can get to Moreno Valley or Sacramento during regular working hours. These documents should be posted on the BLM website, including all pertinent maps.
1087	The WEMO Amendment took 8 years of meetings and subcommittees, four years of a super-group that many were precluded from because of the times that the meetings were held and finally two years in house precluding the public from communication. The public needs to be involved in this process if NEPA is to be used.
1087	There must be adequate discussion/consideration of lost recreation opportunities and how they might be mitigated. Quarterly open house meetings should be held so that the public can receive an update on the progress that is taking place to move forward with route designation recommendations and the plan amendment(s).
1094	It is vitally important this planning effort includes public and agency support to the fullest degree possible to allow a transparent and fully informed approach to the decision making process. We thus encourage the BLM to provide a broad opportunity for public and agency input as early as possible in the planning process. As an agency with extensive knowledge of and direct interest in OHV recreation in the WEMO Plan area, the OHMVR Division looks forward to full participation in the upcoming WEMO Plan amendment

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1097	The maps used to create these routes that I saw, did not show the fact that we have an established community here.
1100	It is difficult to provide scoping comments when the BLM has not selected how it wants to do things under NEPA or FLPMA and the public is provided with no clear idea but is left to look at a mishmash of thoughts. Clearly the BLM wants to amend the motorized vehicle access element of the CDCA plan and the court has ordered a redo of route designation. Beyond that nothing is evident. It appears that the BLM also wants to amend other portions of the CDCA Plan WEMO amendment, but it is not exactly clear as to where, when, which, how, etc. and therefore is a violation of NEPA process.
1100	Predetermined outcomes violate the intent of NEPA. While the judge ordered some specific criteria, and outcomes; the BLM has listed numerous issues which may not be raised by the public. We see this as an attempt to direct the public to an outcome.
1100	The U. S. Department of Energy and BLM and DRECP, Renewable Energy plans must be integrated into the route designation and amendment processes.
1100	The BLM needs to clarify to the public the specific components of the WEMO Plan that are “on the table.” At the scoping meeting the public clearly did not adequately understand the decision space in this planning process. For example, will this effort reopen such issues as: the prohibition of dual sport events in tortoise and MGS areas; the loss of “C” routes in the Spangler area; the “closed unless signed open” paradigm and the Rand Mountains motor vehicle permit?
1100	Sub Regional meetings: Unless these are done with knowledgeable stakeholders as part of all these meetings the plan will fail. Knowledgeable stakeholders must be a part of the route designation.
1100	Quarterly open house meetings should be held so that the public can receive an update on the progress that is taking place to move forward with route designation recommendations and the plan amendment(s).
1101	The BLM must publish accurate maps ofthe entire region and make them available to residents both on-line and in a hard copy for no cost. These maps should be available to the public at public meetings, at the BLM offices and via mail. Dne factor that contributed to the inaccuracy ofthe WEMD maps and route designations was the lack of ground-truthing in these areas. The BLM needs to apply Global Information System (GIS) technology to overlay protected habitat. private lands, wildlife corridors with proposed route designations.
1106	The BLM maps displayed at the public scoping meetings are of extremely poor quality. They lack contour lines, land marks, place names and other information needed to make meaningful accurate public comments of a sufficient quality to relay adequate information to the BLM.
1106	we do not believe that the BLM is adequately meeting the public involvement requirements of NEPA. The BLM has not provided sufficient information to the public at any of the scoping meetings to actively participate in the planning process. We also believe that the BLM is inappropriately limiting the scope of what will be accepted and considered as comments to be provided by the public.
1126	Maps are completely inadequate to provide any substantive basis for scoping
1139	The table stations set up for the Barstow WEMO Scoping Meeting had the poster delineating the purpose of the meeting attached too high up on the wall to read especially for someone needing trifocal glasses. WEMO_1139 There was inadequate time & facilities to handwrite the information from the wall so that the information could then be truly read, assessed and utilized, and a question asked if necessary. I suggested that the posters be taken down and laid flat on the tables -- they "couldn't be". I asked if this information was available elsewhere? "No" I was told that these posters were the only place this information was available but if I filled out one of the scoping comment forms with my request for a copy of this information it would be emailed or mailed to me. Some of the others had also filled out this request and others had just given up. However, BLM did not follow through and forward this information.
1146	There needs to be some adherence to a balance between the general public's participation and the extreme vested interests in the WEMO process. Both the environmentalists that want all the trails closed and the keep every trails open advocates that want no restrictions are the extremes in this process. The majority of the recreating public are in the middle and don't seem to get much attention because they don't yell as loud. They're part of the process too. The loudest voices don't always come from us that use the desert and live here as well.
1158	Information on maps is not user friendly. A data overlay much like google earth would allow people to orient themselves better
1158	The maps provided by the BLM should have the roads as metadata, that can be used by other mapping programs

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1284	The BLM must publish accurate maps of the entire region and make them available to residents both on-line and in a hard copy for no cost These maps should be available to the public at public meetings, at the BLM offices and via mail. One factor that contributed to the inaccuracy of the WEMO maps and route designations was the lack of ground-truthing in these areas.
1284	The BLM must come to the Morongo Basin and hold workshops on how the public can contribute their views on route designations and present evidence regarding the impacts of ORVs on our communities.
1284	If the BLM is truly interested in public comment, it must come to the communities within the WEMO area. In the TM 3 area, the BLM should use a public facility such as the Joshua Tree Community Center or Joshua Tree National Park headquarters and announce the workshops (one on a weekday and another on a weekend) in local newspapers and radio, and through local organizations such as Community ORV Watch, the Morongo Basin Conservation Association, Desert Protective Council, National Parks Conservation Association and ORV vendors and organizations .
1288	General: Request to not show unauthorized routes on the public scoping maps as they will be copied and used to illegally access USFS lands.
1296	Route Designation: Meetings. A number of the scheduled Sub Region dates conflict with long standing meeting dates. For example The January 18th Sub Region meeting conflicts with the Friends of Jawbone. The January 26 Sub Region meeting conflicts with the Ridgecrest Round Table which meets at BLM on that date. The Feb 7th Sub Region meeting conflicts with the Dumont Dunes Sub Group.
1297	A number of the scheduled Sub-Region dates conflict with long standing meeting dates. For example: The January 1st Sub Region meeting is on a Federal and State Holiday. The January 18th Sub Region meeting conflicts with the Friends of Jawbone. The January 26 Sub Region meeting conflicts with the Ridgecrest Round Table which meets at the BLM Office on that date. The Feb 7th Sub Region meeting conflicts with the Dumont Dunes Sub Group. Since the dates are being set up by the Barstow Office and with no representation from Ridgecrest, there is no way that the Ridgecrest Public can participate in a meaningful manner (please see #2)
Livestock Grazing	
1025	The whole West Mojave plan area should undergo a rigorous revision for motorized vehicle access in conjunction with the other planning efforts that will amend the existing WEMO plan amendment to the CDCA including a revision of the grazing element of the WEMO plan and an analysis of cumulative impacts.
1025	Similarly, impacts to species, riparian areas and water resources from grazing and routes are both additive and cumulative and should be considered together in the same EIS.
1026	[TMA 2] Provide a quantitative breakdown of the amounts of routes within BLM grazing allotments so that the compatibility and/or conflicting uses can be identified by the public. This TMA includes the Lacey-Cactus-McCloud, Olancha Common, Tunnawee, Walker Pass, and parts of the Cantil Common Allotments.
1026	[TMA 2] In the cumulative effects analysis, analyze the cumulative impacts of each proposed action with continued grazing on the Lacey-Cactus-McCloud, Olancha Common, Tunnawee, Walker Pass, and parts of the Cantil Common Allotments and all planned, proposed and reasonably foreseeable Solar and Wind energy projects and energy transmission projects on all listed and sensitive species, soil types and Unusual Plant Assemblages.
1026	[TMA 3]This TMA includes the Rattlesnake and Round Mountain Allotments. Provide a quantitative breakdown of the amounts of routes within BLM grazing allotments so that the compatibility and/or conflicting uses can be identified by the public.
1026	[TMA 4] Provide a quantitative breakdown of the amounts of routes within BLM grazing allotments so that the compatibility and/or conflicting uses can be identified by the public. This TMA includes the Rudnick Common, Hansen Common, Warren, and Antelope Valley Allotments.
1026	[TMA 4] In the cumulative effects analysis, analyze the cumulative impacts of each proposed action with continued grazing on the Rudnick Common, Hansen Common, Warren, and Antelope Valley Allotments and all planned, proposed and reasonably foreseeable Solar and Wind energy projects and energy transmission projects on all listed and sensitive species, soil types and Unusual Plant Assemblages.
1026	[TMA 6] Provide a quantitative breakdown of the amounts of routes within BLM grazing allotments so that the compatibility and/or conflicting uses can be identified by the public. This TMA includes the Spangler Hills, Lava Mountains, Rudnick Common, Hansen Common, Monolith Cantil, Bissell, Boron, and most of the Cantil Common Allotments.
1026	[TMA 6] In the cumulative effects analysis, analyze the cumulative impacts of each proposed action with continued

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	grazing on the Spangler Hills, Lava Mountains, Rudnick Common, Hansen Common, Monolith Cantil, Bissell, Boron, and most of the Cantil Common Allotments and all planned, proposed and reasonably foreseeable Solar and Wind energy projects and energy transmission projects on all listed and sensitive species, soil types and Unusual Plant Assemblages.
1026	[TMA 7] Provide a quantitative breakdown of the amounts of routes within BLM grazing allotments so that the compatibility and/or conflicting uses can be identified by the public. This TMA includes the Stoddard and the Shadow Mountain Allotments.
1026	[TMA 7] In the cumulative effects analysis, analyze the cumulative impacts of each proposed action with continued grazing on the Stoddard and the Shadow Mountain Allotments and all planned, proposed and reasonably foreseeable Solar and Wind energy projects and energy transmission projects on all listed and sensitive species, soil types and Unusual Plant Assemblages.
1026	[TMA 8] Provide a quantitative breakdown of the amounts of routes within BLM grazing allotments so that the compatibility and/or conflicting uses can be identified by the public. This TMA includes the Ord-Rodman Allotment.
1026	[TMA 8] In the cumulative effects analysis, analyze the cumulative impacts of each proposed action with continued grazing on the Ord-Rodman Allotment and all planned, proposed and reasonably foreseeable Solar and Wind energy projects and energy transmission projects on all listed and sensitive species, soil types and Unusual Plant Assemblages.
1026	without an analysis of the direct and indirect effects of livestock grazing on many of the West Mojave's sensitive resources that are also impacted by OHV use and routes, it is impossible to meaningfully understand the cumulative effects of any route systems.
1026	The cumulative effects analysis must consider the other land use activities authorized by the BLM including livestock grazing, mining, and energy development. Under the 2006 West Mojave Plan, the continued grazing of domestic sheep and cattle was authorized over a vast swathe of the planning area. Judge Illston in her September 28, 2008 Order overturning the prior West Mojave route designation specifically stated, "On remand, the BLM will consider a host of factors, including grazing issues, in its alternatives analysis." It is unclear to the general public how the BLM is going to address Judge Illston's order with respect to the expected alternatives analysis. However, it is clear that the BLM must address the extensive suite of cumulative effects that livestock grazing, motorized vehicle use and route designation will have on many sensitive resources within the planning area. These include: Impacts to wildlife Impacts to wildlife habitat Impacts to vegetation Impacts to threatened and endangered species Impacts to all special status species identified in the West Mojave planning effort Impacts to unusual plant assemblages Impacts to designated critical habitats Impacts to special status areas such as DWMAs and Habitat Conservation Areas Impacts to visual resources Impacts to wilderness character and to wilderness quality lands Impacts to cultural resources Impacts to soils Impacts to air quality Impacts to riparian areas, water quality, and watersheds Effects on invasive species including the contribution of the route system to subsidizing food, water, and perching sites for the common raven
Route Designation Process	
1002	Information on non-motorized recreational interests potentially impacted by vehicle use is glaringly absent from inventory data collected for the WEMO route designation, and from the WEMO Plan FEIS in general. Interdisciplinary agency specialist involvement in the contracted 2001-02 route inventory also appears to have been minimal, contrary to national BLM guidance and CDCA Plan prescription.
1002	The valid application of CFR minimization criteria using the "decision tree" process applied in the 2003-05 WEMO route designations has come into question. Reviewers have concluded that the resultant process is inconsistent with the policy, law, use of science and common sense that apply to travel management on public lands (Wiygul 2005; TWS et al. 2006). In effect, the subject flow chart (BLM 2003a, 2005a) legitimizes all routes, whether created legally or not, and instead of addressing the CFR minimization criteria, asks the same set of five questions for every route that is evaluated

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	through each "branch" of the decision tree: (1) Whether the route is officially recognized or maintained or represents a principal means of connectivity within a subregion? (2) Whether the route will impact sensitive species or sensitive species habitat? (3) Whether any impacts to sensitive species or sensitive species habitat can be mitigated or avoided? (4) Whether there is any public benefit (e.g. recreation, connectivity, etc.) from the route? (5) Whether the route is redundant, i.e., is there an alternate route? The decision tree process used in the 2003-05 route designations is overly simplistic and fails to acknowledge key issues that are critical for informed decision-making.
1002	To minimize vehicle impacts upon resources and non-motorized uses, both careful route designation and on-the-ground implementation, is needed. This effectively necessitates an interdisciplinary, comprehensive approach. The provision of appropriate vehicle access has to be viewed in the context of natural resource management objectives, travel management regulations, management personnel capability, network maintenance needs, and all authorized uses of associated lands. It must involve all stakeholders and the general public in both route designation design and planning related to program implementation.
1002	A collaborative route designation process involving local communities is a necessity in the WEMO planning area due to the extensive route network that already exists, previous "open" vehicle play area allocations and the complex ownership patterns near urban interfaces. To address these issues, route designation must involve the use of high resolution aerial photography and GIS mapping to identify vehicle use compliance problems. Private lands and non-motorized uses of public lands must also be considered in laying the foundation of a thoroughfare vehicle network that identifies destinations and basic touring opportunities. Cumulative resource impacts and the full scale of implementation tasks must be evaluated.
1002	The first step in route designation necessarily involves identification of a vehicle network baseline, and how resources have been impacted by previous vehicle use. Tools to accomplish these tasks include interdisciplinary field mapping of affected resources and private lands, using aerial photography where beneficial. A second step should involve an interdisciplinary analysis of governing regulations and relevant management plan direction that outline the extent of allowed vehicle use and resource protection needs. The third and arguably most crucial step should include an evaluation of agency personnel capability to manage a given level of vehicle use while achieving the direction outlined by regulations and the governing management plan.
1002	A basic vehicle thoroughfare network reflecting the extent of personnel available to implement the associated vehicle management program can be outlined using a systematic inventory of existing routes and affected resources. Such an inventory should be completed by qualified personnel versed in natural, cultural and visual resource management.
1002	In the 2003-05 WEMO route designation effort, the perception of vehicle route reduction appears to have become of greater concern than proper application of the minimization criteria. Not only was the application of these criteria poorly documented, they do not appear to have been applied properly in all designation analyses.
1002	Such route designation does not effectively incorporate all minimization criteria required by statute. Nor does such route designation heed recommendations previously provided to the BLM relative to route designation and vehicle use management (GAO 1995), or remotely constitute "close coordination" with the entire public.
1002	Route designation must adhere to all laws, the CFR and follow direction outlined in a governing land use plan. Per the FLPMA, resource values are to be protected. Unnecessary or undue degradation of public lands must be prevented. A cohesive route designation program is required for all public lands in the CDCA that address all MUCs. Known problems and issues on MUC U and M public lands in the CDCA are required to be addressed in relevant plans.
1002	Many inconsistencies and deficiencies in the WEMO Plan route designation (BLM 2003a, 2005a) process have been reported. These include the acceptance of a questionable baseline relating to past route designation, the use of a flawed "decision tree" designation approach, inadequate field review, a limited range of management alternatives and insufficient public involvement. Litigation initiated following BLM's adoption of this route designation prompted a U.S. District Court ruling that BLM had violated both the FLPMA and the NEPA in its overall environmental analysis and adopted land use plan amendment. This ruling confirmed that BLM must use 43 C.F.R. § 8342.1 "minimization" criteria, record how the agency did so in its environmental documentation and provide a reasonable range of management alternatives.
1002	It should be noted that the court-ordered remedies to the inconsistencies and deficiencies identified in the WEMO Plan FEIS are interim injunctive actions. However, these measures are crucial considerations which need to be fully integrated into BLM's final WEMO Plan route designation and vehicle use management program.

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1005	BLM now has the opportunity to correct this error. In the proposed plan amendment, the OHV which routes existing pre-1980. Even the Court agreed that trying to figure out what existed on the ground in 1980 was virtually impossible. ?Limited Use Areas? should include, at a minimum, those ?routes of travel? identified as appropriate for such use in the new route designation process. In other words, the new route designation process will redefine the baseline for determining which routes are part of the WEMO Plan and which ones are not. This will eliminate the need to speculate (or guess) as to
1006	In addition, we support the approach recommended in View from the Road - Route Designation in the Mojave Desert and its appendices (Egan et al. 2012) which have extensive information and documentation that should be included in the route evaluation process.
1009	The BLM should accept, and include in their analysis of routes within the WEMO Plan area, information from the public relative to the value of routes of interest, and the amenities, either man made or natural, along those routes.
1015	A request to begin road designation in the CAPA area was made at each meeting held in Ridgecrest for the past five years. Yet nothing was done and decisions to open or close roads have been made without required community participation. The CAPA road designation process must be completed as a separate process after the remainder of the road designation required by the court is finished and the time needed can be spent.
1015	The subregion matrix must also include a recreation portion and a private property portion. Recreation, depending upon type and kind and where is of equal importance with biological systems. There have been many court decisions which require land managers to provide vehicle access to the owners of private property. So these two items should be included in the matrix and in the road designation, roads to private property should not be closed.
1015	Should the BLM decide to use the combined process, a subregion should be evaluated with differing subsets. For example. Red Mountain might be combined with the Rand subregion or another combination might be Red Mountain and the Black Mountain subregion and differing results for road closures or road openings might surface. How the subregions are combined and the criteria for this decision is of great importance.
1016	Within each sub-region and within each Field Office's Some routes should provide a linear experience. · Some routes should provide a connection; a loop route where it is possible. · Some routes designated should provide access to a variety of topography, as this may be part of the experience. For example. The type of topography the route traverses can be associated with the type of experience one gets from the journey. (The road to Lookout in Death Valley and the road to the Creosote Rings. Two very different experiences.) · Some routes designated should represent a variety of scenic opportunities as this is also part of the experience. · Some routes designated should include a variety of points of interest. For example: A historic crossing or a special view point or a floral display. · Some routes should provide access between one sub-sub-region and another. · Some routes should provide access/links between the Field Office transportation system and sub-regions transportation systems. · Some routes should provide access to camping areas. · Some routes should provide access to specific destinations. (Rockhound collecting sites, guzzlers, etc.) · Some routes should provide access to trailheads. · Some routes should provide access to staging areas. For example: Endurance equestrian rides or rock climbing or motorized races. · Some routes designated should have historic or some cultural value. For example: 20 mule team, Spanish Trail, Mojave Road, the Salt Trail etc. · Some routes should provide seasonal opportunity. For example: Hunting, .wildflower viewing, wildlife. · Some routes designated should provide diversity of difficulty for a variety of vehicles. Beginning routes to extreme routes. (Not all inclusive in one route.)

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	· Some routes designated should include the opportunity to achieve the feeling of being, the only one. · Some routes designated should include the opportunity to achieve the feeling of being in an unvisited area. · The final transportation system should provide opportunities for all types of vehicles to have routes for their use and type of recreation. For example: single track for bicycle and motorcycle. · The final transportation system should provide for both primary and secondary and resource access. · The final transportation system should provide opportunities for long distance travel. · The final transportation system should provide opportunities to access gas and other services. · The final transportation system should utilize seasonal closures, seasonal opening, no parking, speed limits, shared use (two weeks motorized use and two weeks non motorized use or one month on and one month off) and other out of the box solutions rather than absolute closure. In other words the final transportation plan could partially restrict the size, scope, and type of activities and/or vehicles rather than closure of the road. Transportation Plan the following: · Some routes should provide access from place to place. · Some routes should provide access to a specific place. For example a group of rocks or a particular Joshua tree. The final transportation system should where possible maintain itself. · The final transportation system should recognize that each type of user may see differing aspects of a route/trail as being desirable or undesirable. · The final transportation system should include the access needs of grazers, miners, utilities, jeep tours, duel sport, filming industry and communication sites. · The final transportation system should favor “multiple use routes”. · The final transportation system should include routes which connect with routes in other management areas to provide for long distance touring. · The final transportation system should designate routes which should be the most environmentally sound if more than one route serves the same purpose in an area. Do not neglect transition zones. · The final transportation system should include duplicate roads when it is determined that the route provides a safe exit in fire or flood. · The final transportation system should include all roads which connect in some way to those designated open in other states.
1016	The Society believes there should be a separate process for the CAPA; to do other than this at this time will deny the opportunity for comment to those who made the effort to attend the “scoping/open house meetings.
1016	The Society believes that the BLM must seek some kind of U. S. Fish and Wildlife Service review or consultation on this current route designation process. The Society is concerned that without the single track routes included as part of the infrastructure and designated there will be more, not less environmental disruption.
1016	The BLM must remember that California Law recognizes washes of a certain size (at least 28 inches wide) as routes and must designate these washes open, limited or closed.
1016	At a meeting several years ago BLM promised the 350 people who attended, (this included members of congress, members of Boards of Supervisors and members of City Councils) there would be a CAPA for their areas of interest. T
1017	There is more than one legal decision involved in the road designation process. The CAPA decision started with road designation for that area beginning in 2006 and was extended for five years. This time frame ended in March of 2011. A request to begin road designation in the CAPA area was made at each meeting held in Ridgecrest for the past five years. Yet nothing was done and decisions to open or close roads have been made without required community participation. The CAPA road designation process must be completed as a separate process after the remainder of the road designation required by the court is finished and the time needed can be spent. If this turns out not to be possible then the El

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	Paso/CAPA sub-region must be done either as the first or last sub-region in the route designation process.
1017	The sub-region matrix must also include a recreation category and a private land category which are of equal importance with biological systems. There have been many court decisions which require land managers to provide vehicle access to the owners of private property. So these two items should be included in the matrix and in the road designation, roads to private property should not be closed.
1017	The duel process is the one which the BLM should undertake. It will allow appropriate study of the amendment(s) while also participating in the route designation process.
1017	The SPCW believes that each sub-region should not be combined with another, but should be looked at separately. Each of the 33 regions is just as important as the next and they need to get full attention. However, should the BLM decide to use the combined process when looking at sub-regions; a sub-region should be evaluated with differing subsets. For example. Red Mountain might be combined with the Rand sub-region or another combination might be Red Mountain and the Black Mountain sub-regions and differing results for road closures or road openings might surface. How the sub-regions are combined and the criteria for this decision is of great importance. The public must be involved.
1017	It should be made clear to all participants that the 43CFR 8342.1 criteria which must be utilized in determining road designation does not preclude options other than closure…..Such as: seasonal use, dry weather use, relocation of camping off road, reduction of the number of vehicles in an event or activity, etc. Court desired outcomes can be reached a number of ways.
1020	The BLM must provide plans to ensure compliance, with data to back up the prediction of a high level of confidence. The BLM also must provide monitoring plans to measure compliance, and plans for management modifications when lack of compliance is detected. To ensure compliance, BLM must go well beyond current techniques, which have proved ineffective in numerous areas. Since larger budgets cannot be expected, BLM must establish more efficient tools and techniques.
1022	In general, CA4WDC does not endorse an amendment to the WEMO Plan to analyze motorized vehicle use separately or in conjunction with sub-regional route designation . However, as this planning effort is part of a court-ordered settlement, an amendment to the WEMO Plan is necessary. As such, the analysis must encompass the entire WEMO region and not separated to individual sub-regional route designation actions.
1025	Subregions should be identified based on watersheds. Density cap for roads/routes/trails should be identified for each subregion, based on soil type and other multiple use development activities within that subregion, conservation status, threatened and endangered species habitat and other factors.
1026	If the BLM wishes to continue with the “sub-region” concept, the agency must provide a rational explanation as to why the West Mojave planning area needs to be divided into these “sub-regions”, and must provide an objective definition of the term “sub-region” that facilitates and does not compound the cumulative effects analysis. If the BLM believes that consideration of “sub-regions” is required, then the BLM should consider alternative, objective ways to delineate “sub-regions” such as the use of existing DWMA and habitat conservation area boundaries, ecotypes, or designated land use boundaries to comply with the mandate that route designations be based on the protection of the resources of the public lands.
1027	Although it seems prohibitive that the BLM will have the opportunity to analyze each sub-region to the specificity necessary, appropriate sub-regions can be grouped to WEMO-1027 aid in the analysis.

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1037	The existing process and decision criteria developed for the previous Western Mojave Desert Off Road Vehicle Designation Project Record of Decision, June 2003 remain valid and should be used to designate routes in the WEMO plan area.
1037	The travel analysis must encompass the entire WEMO region and not separated into individual sub-regional route designation actions.
1041	I request that review of the land use policies in the Mojave Desert include recognition of the many devoted riders who live in California and wish to safely and responsibly share their public lands, too. Would you please consider adding an equestrian voice to your Desert Advisory Council Subgroup?
1042	we support the “Separate Process” over the “Combined process” explained at the Barstow Scoping meeting.
1042	we again request that the Juniper Sub Region receive a separate Management Plan.
1046	The effort to designate a route network must include all the information available, and not just where people want to ride a motorcycle, ATV, RUV, UTV, jeep or other off road vehicle.
1046	Goals and objectives for each Sub Region in the Travel Management Areas must be made clear in draft EIS for all sub regions and “unclassified” lands.
1046	The BLM must coordinate fully with the land uses, owners and managers adjacent to BLM managed lands.
1057	First, BLM should initially "screen" each proposed route to determine if it is located in designated wilderness areas or primitive areas. If a route is located in one of these areas, it should be eliminated from the network unless the authorized officer can make written findings, supported by the best available evidence, that the route in question will not adversely affect the natural, esthetic, scenic, or other values for which the wilderness or primitive area was established. (43 CFR Part 8342.1 (d)).
1057	Next, each route should be evaluated for possible impacts on soil, watershed, vegetation, air, and other resources of the public lands, and for any possible impairment of wilderness suitability. If such impacts are identified, the route should be relocated or realigned to minimize them. (43 CFR Part 8342.1 (a». In some cases, it will be appropriate to eliminate the route from further consideration.
1057	Third, each route should be evaluated for its potential to cause harassment of wildlife or significant disruption of wildlife habitat, with special attention given to endangered and threatened species and their habitats. If a route shows such potential, it should be relocated, realigned, or, in extreme cases, eliminated from consideration. (43 CFR Part 8342.1 (b».
1057	Fourth and finally, each route should be assessed for possible conflicts between OHV use and other existing or proposed recreational uses of the same or neighboring public lands. Where such conflicts appear likely, the route should be relocated, realigned, or, if the conflict seems insoluble, eliminated from consideration. In addition, the route should be located to ensure compatibility with existing conditions in populated areas, taking into account noise and other factors. (43 CFR Part 8342.1 (c».
1066	I believe that the environmental studies could be conducted without closing our roads to the people who use them.
1071	And here is a link to the actual DMV Code on combined uses. I think it would be a valuable tool throughout the BLM as you administer to the Desert via the WEMO plan, and in many other areas of Desert, besides our three little towns. The State also notes here, "how and who" to designate this section, and, also how to get the State to pay for it!! http://dmv.ca.gov/pubs/vctop/d16_5/vc38026.htm
1071	I read VC Section 38026.1. I think it could be even more help to you because it designates a pilot project in Inyo County, also mentioning the BLM as a "participant", and apparently, you as the BLM, also have the authority to authorize and enact this. It extends the 3 miles to 10 miles, (not that 10 miles is necessary in our three little towns), and gives more written guidance about the subject, including signage, and you might also want to look into what Inyo Co. has done/is doing and has learned as precedence for your use here in our counties.
1081	The eight WEMO planning areas identified are too complex to group together. Local communities that are affected by the proposed decision need a local BLM meeting to exchange information and provide comments. Issues in each sub-region and sub-sub-region, other than route designation and which may impact route designation are different and must be examined in their entirety.
1081	In the haste to complete the WEMO amendment to the CDCA Plan, many hundreds of miles; maybe thousands of miles, of single-track roads used by bicycles and motorcycles were not included in the final WEMO route designation process.

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	This has led too much of the alleged "trespass" issues currently happening.
1081	Specific Comments Within each sub-region and within each Field Office's Transportation Plan the following: · Routes signed closed through this process or any other process, must immediately be signed CLOSED. · Routes should provide access to a specific place. · Routes should provide a linear experience. · Routes should provide a connection; a loop route where it is possible. · Routes designated should provide access to a variety of topography, as this may be part of the experience. · Routes designated should represent a variety of scenic opportunities, as this is also part of the experience. · Routes designated should include a variety of points of interest, for example a historic crossing or a special viewpoint or a floral display. · Routes should provide access between one sub-sub-region and another. · Routes should provide access/links between the Field Office transportation system and sub-regions transportation systems. · Routes should provide access to camping areas. · Routes should provide access to specific destinations. · Routes should provide access to trailheads. · Routes should provide access to staging areas (Endurance equestrian rides or rock climbing or motorized races). · Routes designated should have historic or some cultural value (20-mule team, Spanish Trail, Mojave Road, the Salt Trail etc). · Routes should provide seasonal opportunity (hunting, wildflower viewing and wildlife). · Routes designated should provide diversity of difficulty for a variety of vehicles. Beginning routes to extreme routes and not all-inclusive in one route. · Routes designated should include the opportunity to achieve the feeling of being in an unvisited area. · The final transportation system should provide opportunities for all types of vehicles to have routes for their use and type of recreation. For example: single track for bicycle and motorcycle. · The final transportation system should provide for both primary and secondary and resource access. · The final transportation system should provide opportunities for long distance travel. · The final transportation system should provide opportunities to access gas and other services. · The final transportation system should utilize seasonal closures, seasonal opening, no parking, speed limits and shared use. In other words the final transportation plan could partially restrict the size, scope, and type of activities and/or vehicles rather than closure of the road. · The final transportation system should recognize that each type of user might see differing aspects of a route/trail as being desirable or undesirable. · The final transportation system should include the access needs of grazers, miners, utilities, jeep tours, duel sport, filming industry and communication sites and of course access to private property. · The final transportation system should favor "multiple use routes". · The final transportation system should include routes that connect with routes in other management areas to provide for long distance touring. · The final transportation system should designate routes which should be the most environmentally sound if more than one route serves the same purpose in an area. · The final transportation system should include duplicate roads when it is determined that the route provides a safe exit in fire or flood. (Homewood Canyon is a great example, however the BLM has not even talked to the people there or sent notification. · Roads R5 and R50 which have been fenced to prevent inadvertent trespass in the Rands (tortoise area) need to be designated open to vehicle travel. There is no longer any reason for them to remain closed. ·The Conklin Road should be re-opened as it was closed illegally.
1081	NPLNEWS believes the process should begin with designating as open all routes which are congressionally designated open …."cherry stems and wilderness boundary roads" as part of the Wilderness process. BLM and the courts should ratify routes that have been congressionally approved by Congress.
1081	In 2003, with the public help, BLM set up the El Paso Collaborative Access Planning Area group (CAPA). The CAPA was blessed by BLM in 2003 to allow citizens to assist BLM in determining where those public roads are within the El Paso Planning Unit of the West Mojave Plan...This document goes further to state that: "A timeline for completing the El Paso CAPA process follows" starting with a June 30, 2003 date." Members of the Ridgecrest City Council were key members of this effort - since they know best how desert access, filming and recreation affect the economic base of the City of Ridgecrest and Eastern Kern County communities. Of course,
1081	Our Ridgecrest City Council was promised completion of the CAPA and just recently sent a letter requesting this, however, to date the BLM has not responded.
1087	Without consulting with Congress, BLM California Management divided up the CDCA into bioregions and inserted a new process using these bioregions as a basis to amend the CDCA Plan (NEMO, NECO, WEMO). This process was developed from a single use theme that never reached consensus or approval from the American people. That explains the mess we are dealing with now. For instance, this vehicle part is in the WEMO Amendment, however, will it eventually apply to the whole CDCA? This must be addressed. Many of these roads are also segments of NEMO. All roads must be up for consideration in the road designation process so as to be able to demonstrate true "minimization" which has already occurred in the California Desert Conservation Area.

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1087	A request to begin road designation in the CAPA area was made at each meeting held in Ridgecrest for the past five years in a public forum. No decisions to open or close roads have been made with required community participation. The CAPA road designation process must be completed as a separate process.
1087	The Sub Region matrix must also include a recreation category and a private land category. There have been many court decisions, which require land managers to provide vehicle access to the owners of private property. Roads to private property should not be closed.
1087	The BLM proposes to include as part of the road designation and amendment of the CDCA Plan additional changes, which are not specifically a part of the road designation process.
1087	Should the BLM decide to use the combined process, a Sub Region should be evaluated with differing subsets. How the Sub Regions are combined and the criteria for this decision are of great importance. The public should be involved.
1087	The BLM should begin the road designation process with those roads for which it will be easy to justify their status; for example, Congressionally designated open "cherry stems" should be left open as Congress has already designated them open.
1087	BLM should leave the words "existing roads and trails" in the CDCA Plan however it should be clarified as to reflect that this does not just mean 1980. It should mean whatever roads are in existence on the ground when access issues are determined.
1087	The BLM proposes to include as part of the road designation and amendment of the CDCA Plan additional changes, which are not specifically a part of the road designation process. Should the BLM proceed on this course the Vehicle Access Element of the plan needs to be amended to specifically reflect the wording contained in the California Desert Protection Act with respect to exempt vehicle access in Wilderness areas. The Closed section in Chapter 3 should read, "No vehicle travel is allowed." Except that Vehicle Access is authorized for the purposes of fighting fire, protecting health and safety and maintaining and repairing and, in times of drought, carrying water to guzzlers, and tanks and maintaining and monitoring wells, and maintaining seeps, springs, and tinajas. Roads leading to the guzzlers, wells, seeps, springs tinajas and tanks will not be closed or eliminated but may be gated with locks."
1100	The BLM proposes to include as part of the road designation process and amendment of the CDCA Plan, additional changes which are not specifically a part of the road designation process. Should the BLM proceed on this course the Vehicle Access Element of the plan needs to be amended to specifically reflect the wording contained in the California Desert Protection Act with respect to exempt vehicle access in Wilderness areas. The Closed section in Chapter 3 should read, "No vehicle travel is allowed." Except that Vehicle Access is authorized for the purposes of maintaining and repairing and in times of drought carrying water to guzzlers, and tanks and maintaining wells, and maintaining seeps, springs, and tinajas. Roads leading to the guzzlers, wells, seeps, springs tinajas and tanks will not be closed or eliminated but may be gated with locks."
1100	There is more than one legal decision involved in the road designation process. The CAPA decision started with road designation for that area beginning in 2006 and was extended for five years. This time frame ended in March of 2011. A request to begin road designation in the CAPA area was made at almost every meeting held in Ridgecrest for the past five years. Yet nothing was done and decisions to open or close roads have been made without required community participation. The CAPA road designation process must be completed as a separate process after the remainder of the road designation required by the court is finished and the time needed can be spent. Should this not be possible then the El Paso/CAPA road designation process must be done as the first sub-region or the very last sub-region.
1100	The subregion matrix must also include a recreation category and a private land category which are of equal importance with biological systems. There have been many court decisions which require land managers to provide vehicle access to the owners of private property. So these two items should be included in the matrix and in the road designation. Roads to private property should not be closed.
1100	Upon close examination each matrix is slightly different. The process should be the same for the Barstow Field Office as it is for the Ridgecrest Field Office.
1100	The dual process is the one which the BLM should undertake. It will allow appropriate

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	study of the amendment(s) while also allowing participation in the route designation process.
1100	The RACC believes that each sub-region should not be combined with another, but should be looked at separately. Each of the 33 regions is just as important as the next and they need to get full attention. However, should the BLM decide to use the combined process when looking at sub-regions; a sub-region should be evaluated with differing subsets. For example, Red Mountain might be combined with the Rand subregion or another combination might be Red Mountain and the Black Mountain subregions and differing results for road closures or road openings might surface. How the sub-regions are combined and the criteria for this decision are of great importance. The public must be involved.
1100	The West Mojave Desert Off Road Vehicle Designation Project book indicates that the Sub-Regions do not match. The Notice and the maps show us 33 sub-regions. The old Off Road Vehicle Designation Project had 20 sub-regions. This kind of deception only adds to the public's confusion and makes it impossible to comment in an informed manner as required by NEPA.
1100	The RACC is concerned that all routes align with neighboring NEMO routes unlike the original WEMO route designation maps. For example: the North Searles and the Cronese Lakes sub-regions.
1100	The BLM should begin the road designation process with those roads for which it will be easy to justify the status. For example: Designate as Open R5 and R54 as both these roads are through and fenced along both sides. Or Congressionally designated open roads the "cherry stems".
1106	The El Paso Mountains and the Ridgecrest Subregions should be excluded from the current WEMO route designation process.
1106	The El Paso Mountains and the Ridgecrest subregions were specifically excluded from the WEMO route designation process and because they were never evaluated using the faulty decision tree process and because they have never received public review as required by NEPA, these subregions should not be considered in the current court mandated action but should be addressed at a later date...Bill Haigh, the WEMO Project Manager, committed to the local residents that the El Paso and Ridgecrest Subregions would be addressed at a later date when more focus and local involvement would be feasible. Thus is why the CAPA (Collaborative Access Planning Area) became part of the final WEMO Environmental Impact Statement and Record of Decision.
1106	During numerous monthly public meetings held by the BLM Ridgecrest Field Office over the last several years, members of the public have repeatedly requested that the BLM begin the CAPA process while there was time to adequately address the route designations under a reasonable time constraint and minimum pressure. It was repeatedly pointed out by members of the public that if the BLM did not accomplish the El Paso Mountain and Ridgecrest Subregion CAPA that sooner or later we would be in a bind to get it done in the future. As a result of inaction on the part of the BLM we are now seeing that unnecessary urgency that could have been avoided if the BLM had done its job in a timely manner. Addressing the route designations for the El Paso Mountains and Ridgecrest Subregions as part of the ongoing court mandated process does not comply with the BLM's commitment for a "community-based collaborative process as described in the WEMO Final Environmental Report and Statement.
1134	The BLM needs to adopt the EPA Route Policy, (Encourage, Prohibit and Allow Route Policy) that the OHV leadership has developed and is using nationwide at every level of government.
1134	There is no distinction being made between Open and Limited areas. Everything is lumped together and decisions are being made on limited areas for actions in Open areas which are perfectly legal.
1146	I would not like to see all subregions lumped together and treated as 1. Many areas have problems unique to themselves. One size fits all solutions is really no solution at all.
1146	Use consistent criteria for evaluating routes.
1249	Use a set of well-defined criteria and guidelines for establishing routes. Criteria should include guidelines regarding routes in washes or hydrologically significant areas, crossing private parcels, routes that can impact ACEC, Wilderness areas, special

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	habitat areas or DWMAs, or cultural resource areas. These criteria should be clearly stated and uniformly applied to avoid route sitings that are arbitrary or inappropriate.
1249	Subregional areas can be combined for planning purposes, where appropriate. Rather than fragment the planning process, combine subregional areas for planning and meetings where appropriate, to allow for the best dialogue and interaction among interested parties. For example, the Joshua Tree, Wonder Valley, Morongo Valley and Rattlesnake Canyon subregions comprise a logical "Morongo Basin" planning area.
1250	Due to the many users and problems in this area we support the "Separate Process" as opposed to the "Combined Process". The proximity to a large population creates some unique problems to be considered. The "Motorcycle Only" routes are not working out well. Other vehicles are still using them and erosion appears to be a huge problems with most of them. We think there needs to be more emphasis on education in the area as some do not know about the "Motorcycle Only" designation. There is also a general problem with users not understanding the route system in the area. Accurate maps of the area need to be available to the motorized users along with general rules for hunting, wood gathering and other uses. An informed and knowledgeable public is the key to success with the route designation and reduction of rotlte proliferation and other illegal activities.
1251	natural/cultural resources, special status species, the visual landscape, non-motorized uses and private lands, knowledgeable interdisciplinary analysis and the use of the best available science are all crucial considerations in route designation/vehicle network management and in fulfilling the tenets of the National Environmental Policy Act (NEPA) and the Federal Land Policy and Management Act (FLPMA}.
1251	Evaluation of potential open routes on the ground by a team of interdisciplinary specialists based on the CFR and aerial photo analysis, coupled with an evaluation of BLM staff capability to manage, maintain and enforce the resulting network;
1256	I think the BLM should complete the "El Paso Capa"
1257	Within each sub-region and within each Field Office's Transportation Plan the following:; • Some routes should provide access from place to place. • Some routes should provide access to a specific place. For example a group of rocks or a particular Joshua Tree. • Some routes should provide a linear experience. • Some routes should provide a connection; a loop route where it is possible. • Some routes designated should provide access to a variety of topography, as this may be part of the experience. For example. The type of topography the route traverses can be associated with the type of experience one gets from the journey. (The road to Lookout in Death Valley and the road to the Creosote Rings. Two very different experiences.) • Some routes designated should represent a variety of scenic opportunities as this is also part of the experience. • Some routes designated should include a variety of points of interest. For example: A historical crossing or a special view point or a floral display. • Some routes should provide access between one area and another. • Some routes should provide access/links between Field Office and sub-region transportation systems. • Some routes should provide access to camping areas. • Some routes should provide access to specific destinations. (Rockhound collecting sites, guzzlers, etc.) • Some routes should provide access to trailheads. • Some routes should provide access to staging areas. For example: Endurance equestrian rides or rock climbing or motorized races. • Some routes designated should have historic or some cultural value. For example: 20 mule team, Spanish Trail, Mojave Road, the Salt Trail etc. • Some routes should provide seasonal opportunity. For example: Hunting, wildflower viewing, wildlife. • Some routes designated should provide diversity of difficulty for a variety of vehicles. Beginning routes to extreme routes. (Not all inclusive in one route.) • Some routes designated should include the opportunity to achieve the feeling of being, the only one. • Some routes designated should include the opportunity to achieve the feeling of being in an unvisited area. • The final transportation system should provide opportunities for all types of vehicles to have routes for their use and type of recreation. For example: single track for bicycle and motorcycle.

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	• The final transportation system should provide for both primary and secondary access. • The final transportation system should provide opportunities for long distance travel. • The final transportation system should provide opportunities to access gas and other services. • The final transportation system should utilize seasonal closures, seasonal opening, no parking, speed limits, shared use (two weeks motorized use and two weeks non motorized use or one month on and one month off) and other out of the box solutions rather than absolute closure. • The final transportation system should where possible maintain itself. WEMO - 1257 The final transportation system should recognize that each type of user may see differing aspects of a route/trail as being desirable or undesirable. • The final transportation system should include the access needs of grazers, miners, utilities, jeep tours, duel sport, filming industry and communication sites. • The final transportation system should favor "multiple use routes". • The final transportation system should include routes which connect with routes in other management areas to provide for long distance touring.
1287	We are advised that there is more than one legal decision involved in the road designation required community participation. The CAP A road designation process must be completed as a separate process after the remainder of the road designation required by the court is finished and sufficient time for this process can be allocated. process. The CAP A decision started with road designation for that area beginning in 2006 and was extended for five years. This time frame ended in March of 2011. A request to begin road designation in the CAP A area was made at each meeting held in Ridgecrest for the past five years. Yet nothing was done and decisions to open or close roads have been made without
1287	Sub-Regional meetings: Unless sub-regional meetings involve the participation of and contribution by knowledgeable stakeholders, the plan will be ineffective and it will fail. Therefore, knowledgeable stakeholders representing all affected interests, including those of rockhounds, must be sought and included in the meetings and decisions regarding each route designation.
1287	We believe that each sub-region should be addressed separately and thoroughly, and that no subregion should not be combined with another, but should be analyzed separately. Each of the 33 regions is just as important as the next and demand complete analysis and attention. However, should the BLM decide to use the combined process when analyzing sub-regions; a sub-region should be evaluated with differing subsets. For example. Red Mountain might be combined with the Rand sub-region or another combination might be Red Mountain and the Black Mountain sub-regions and differing results for road closures or road openings might surface. How the sub-regions are combined and the criteria for this decision are of great importance. Public participation must be diligently sought and considered.
1287	We are advised that the West Mojave Desert Off-Road Vehicle Designation Project book indicates that the Sub-Regions do not match with what has been proposed in the current plan amendment. The Notice and the maps include 33 sub-regions. The old Off Road Vehicle Designation Project included 20 sub-regions. We are aware of no mention of this in the proposed amendments to the WEMO plan. This adds to the public's confusion and makes it impossible to comment in an informed manner as required by NEPA.
1287	The BLM should begin the road designation process with those roads for which it will be easy to justify the status. For example: Designate R5 and R54 routes as "open" because as both of these route types are through and fenced along both sides. Further, designate Congressionally designated open roads, and spur roads (or cherry stems) serving rockhounding locations and other important recreational sites as "open"
1295	1. When the BLM first drafted the plans for the West Mojave, only interim route designations were made because of the understanding, which was documented at the time, that there would be a collaborative planning process that included robust public participation. 2. Since that time, the BLM has acknowledged and reconfirmed, both at the Resource Area level and the District Office level their commitment to the CAPA process.

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	3. In the current lawsuit over the WEMO plan, only the 'decision tree' process of route designation was invalidated. Neither the necessity of the CAPA process, or BLM's commitment to it were changed by either the formal record of decision or by implication. 4. Not only is the CAPA process a continuing legal and ethical requirement, it is a proactive process that should substantially lessen the possibility of legal challenges through the normal course of give and take we call compromise. 5. Since the current proposal to have the DAC handle WEMO route designations cannot supplant or eliminate the BLM's commitment to the CAPA process, the efforts of the DAC will end up being duplicative. As someone who has considered applying for a position on the DAC, I for one cannot believe that the DAC would be asked to do something that would involve a substantial amount of effort only to have those efforts put to the side at a later date because they were inadequate. 6. I see no reason why, if the CAPA process were begun in earnest now, that it could not be completed in time to comply with the legal requirements of the lawsuit, thereby making the BLM's compliance not a matter of bare necessity, but a model worthy of commendation.
1296	Route Designation: CAPA. The court decision on route designation did not apply and does not apply to the lands involved in the CAPA. Not a single road in the CAPA area was designated using the decision tree which the court threw out. BLM agreed to and promised to do the CAPA route designation as a separate process. If you so decide, it can be a parallel process with the court ordered route designation. It must be clearly separate with separate maps, separate meetings, separate hearings, separate designations and separate everything.
1297	In the current lawsuit over the WEMO plan, only the 'decision tree' process of route designation was invalidated. Neither the necessity of the CAPA process, or BLM's commitment to it were changed by either the formal record of decision or by implication. The CAPA must be clearly separate with separate maps, separate meetings, separate hearings, separate designations and separate everything Since the current proposal to have the DAC handle WEMO route designations cannot supplant or eliminate the BLM's commitment to the CAPA process, the efforts of the DAC will end up being duplicative.
43 CFR 8342.1(a) – Route Designation Criterion A	
1002	Minimizing vehicle impacts upon natural resources and non-motorized uses is dependent upon the basic criteria applied in the initial evaluation of routes considered for vehicle travel. However, this minimization is wholly dependent on the implementation of use limitations on the ground. Without effective designation and use management implementation, adverse impacts to resources, other uses and interspersed/adjacent private lands can occur.
1002	The public was also not informed of route designation decisions/issues on MUC M or U public lands which border route designation areas or how vehicle use would be managed to develop a cohesive program in the 2003-05 WEMO route designation plans.
1002	Significant degradation of natural resources, scenic values and adjacent private lands are occurring on MUC U public lands (Figure 7) and are suspected on MUC M public lands. Yet no discussion of these lands, cohesion to routes on adjacent MUC L lands or responsive treatment for noted problems, was included in BLM's 2003-05 WEMO route designation plans.
1002	The Natural Resources Conservation Service (NRCS) has rated soil series in many various portions of the Mojave Desert as having low, moderate, or high erosion. When coupled with the degree of topographic slope in a particular area, these erosion potential ratings are a good indicator for identifying where to limit or exclude vehicle use. Continued vehicle use of existing routes in certain topography should be evaluated in terms of affected soils, erosion potential data maintained by federal agencies and according to expected vehicle type of use. In addition, route designation efforts should assess whether vehicle use of a particular route will direct vehicle operators to known high-erosion sites. Where this is not accomplished, damage to soils by vehicle use is not being minimized.
1002	The primary recommendation associated with vehicle use impacts to hydrology and air quality is to minimize the number of recreational vehicle routes located in unstable soil areas, steeper slopes and areas that adversely affect watersheds, as well as locations proximal to any urban interface and/or residential area. Routes documented as contributing to excessive soil erosion should be closed. Another recommendation that arises is to make use of all available means to effectively stabilize and rehabilitate designated closed routes that are contributing to soil erosion as quickly as possible.
1002	The BLM could significantly improve both air quality and hydrology by identifying problem erosion/sensitive soil locations and designating the minimal number of routes necessary for thoroughfare travel. Designated closed routes

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	that are resulting in erosion and/or hydrologic impacts should also be stabilized and rehabilitated as quickly as possible.
1002	The intensity, frequency and area of disturbance associated with vehicle use should be minimized on limited use public lands to avoid an often irretrievable loss of native plants and wildlife. Route designation efforts should focus on providing a minimal route network with a focus on thoroughfare travel, as well as active rehabilitation of designated closed routes.
1002	The BLM designated sensitive white-margined beardtongue (Penstemon albomarginatus), which occurs on certain public lands identified for solar development, is also at risk from vehicle use and camping/staging activity.
1002	Suitable habitat for the Mojave monkeyflower is easily disturbed and is situated in areas where frequent vehicle travel occurs.
1002	Visual resource and scenic values should be taken into consideration during the route designation process. The VRM system should be utilized in the consideration of open routes and in the prioritized scheduling of closed route rehabilitation actions.
1002	Vehicle use within streams/riparian areas can disturb wildlife, erode streambanks, reduce structural integrity, dewater shallow streams and increase stream sedimentation
1008	Not only are we concerned about closures of riding trails, we are also concerned about historical points of interest and scenic views.
1016	Routes to First American's traditional gathering and religious locations should not be closed. Routes limited maybe, with a gate or possibly just left open.
1025	Currently designated off road vehicle open areas should also be evaluated for ecological integrity, as well as for the additive and cumulative impacts of these areas on all resources – including air quality. If any portions of the open areas or adjacent routes are determined to be vulnerable to erosion and habitat degradation, they should be managed to preclude irreversible environmental damage as per BLM's multiple use mandate.
1025	As a result, if BLM does not find ways to improve air quality at open areas we are concerned that recreationists seeking cross-country travel experiences may shift use to designated routes and engage in route proliferation and unlawful cross country travel in other areas.
1026	In addition, because a large portion of the planning area is classified as a federal nonattainment area for particulate matter (PM10), any increase in such emissions would not only result in a violation of federal law, but could also lead to unacceptable adverse effects on human health. PM10 particles are a threat to human health because they can be inhaled into the nose, throat, and/or lungs, where they tend to deposit in air sacks. Two major activities that contribute to PM10 emissions are OHV travel and OHV open areas. More open routes will result in an increase in PM10 emissions, which, in turn, will lead to further significant adverse effects on human health.
1046	Riparian areas are rare and every inch of what we have left of riparian areas needs to be protected. Human impacts to these fragile areas (both motorized and non-motorized access) will increase over time and those impacts must be fully evaluated in the proposed plan.
1046	Visual Resources: Many people visit the Mojave Desert for its visual resources. Wide open spaces, miles and miles of visibility, beautiful mountain ridges and large fields of wildflowers. All uses have an impact on these resources. Every proposed use eats away at the Mojave Desert's inventory of visual resources.
1055	all routes eliminated in washes and other ephemeral waterways;
1095	*No ORVs in washes
1250	Route designation should also avoid wildlife areas and riparian areas which are critical for wildlife survival. All routes must avoid proximity to all riparian areas, as they are used by wildlife, photographers, hikers, birders and others seeking the quiet and beauty of such places. Motorized routes should also avoid areas of unique plants and important vegetation resources. Access on foot is more appropriate to such locations and hiking trails and trailheads should be part of the route designation process.
43 CFR 8342.1(b) – Route Designation Criterion B	
1002	These direct and indirect impacts of vehicle use upon vegetation and wildlife resources in the western Mojave Desert do not appear to have been adequately addressed in the BLM's 2003-05 WEMO Plan route designation.
1002	Where routes are designated as open within or proximal to certain wildlife habitat features, specific management actions may need to be applied and closely monitored to ensure vehicle use does not unduly impact these resources. These efforts should also take into consideration the high potential for invasive plant introduction/spread along travel ways, fire ignition risk and the ramifications of global warming on animal/plant distribution in arid lands.

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1002	When uncontrolled, vehicle use can result in the loss of tortoises, degradation of habitat, and seriously undermine conservation/recovery efforts
1002	How exactly an increase in open route mileage furthers tortoise recovery was not explained in the WEMO Plan; a document prepared ostensibly to guide the implementation of tortoise recovery in the western Mojave Desert.
1002	Cross-country vehicle use is also known to crush shrubs important as food and thermal cover for MGS. Areas lacking specific shrubs or highly fragmented by roads may not support MGS populations in certain dry years.
1002	The current limited distribution of MGS suggests a need to closely and carefully manage habitat for the species in any route designation effort involving these eight specific areas. Yet there is no indication this was specifically done in the BLM's 2003-05 route designation effort.
1002	However, there is no indication in the WEMO Plan that occupied or suitable bat habitat was considered in BLM's 2003-05 route designation effort.
1002	There is no indication in the WEMO Plan that bighorn sheep were considered in BLM's 2003-05 route designation effort.
1002	Breeding populations of Bendire's thrasher Potential threats to the species include ORV activity (Remsen 1978).
1002	The gray vireo is known to breed in the San Bernardino and San Gabriel Mountains (Garrett and Molina 1998); specifically in Crystal Creek (Bighorn Subregion). It is also known from Phelan and the Big Rock Creek/Bob's Gap and suspected to occur throughout portions of the Juniper and Bighorn Subregions. It is commonly associated with chamise chaparral, but is often found in more open pinyon-juniper woodland and semi-desert chaparral in the western Mojave Desert. ORV recreation has the potential to disturb this species
1002	The WEMO planning area encompasses a large percentage of the Le Conte's thrasher range in California (Prescott 1998). This species is found in open desert with scattered shrubs and sandy soil (Grinnell and Miller 1944). Washes with cholla (Cylindropuntia spp.) or saltbush (Atriplex spp.) appear to be preferred nesting habitat. The species is known from the Bighorn, Fremont, Granite, Juniper and Kramer subregions of the WEMO planning area. ORV use, especially in the nesting season, could be detrimental to Le Conte's thrasher (Remsen 1978).
1002	Vehicle use and recreational activities can adversely affect avian nesting/foraging habitat and nestling survival
1002	There is no indication in the WEMO Plan that known nest sites, likely nesting habitat or potentially suitable migratory habitat for special status birds was specifically considered in BLM's 2003-05 route designation. Specific habitat types and features which are commonly associated with higher avian nesting rates, such as woodlands, cliffs/boulder slopes and riparian areas should be taken into account in route designation efforts.
1002	ORV impacts, including direct harm to MFTL and associated habitat degradation, have been documented (Beatley 1994) and acknowledged (USFWS 2008b).
1002	There is no indication that occupied MFTL habitat was considered in BLM's 2003-05 route designations, including within the Pisgah or Pinto MFTL Conservation Areas where relatively frequent ORV use was noted in 2010.
1002	These habitat parameters commonly sought by CHL are often common on recreational route shoulders, where individual CHL can be at great risk of vehicular crushing impact. CHL populations are specifically known from high vehicle use areas within the Bighorn and Juniper Subregions. Reptile collection, habitat loss, vehicles, livestock grazing, and the introduction of Argentine ants have been implicated in the decline of the CHL (Jennings and Hayes 1994). There is no indication in the WEMO Plan that occupied or suitable habitat for the coast horned lizard was used as a consideration in BLM's 2003-05 route designation effort.
1002	Tortoises are also known to occur outside designated critical habitat and such occurrences need to be considered in all route designation endeavors.
1022	Specifically, the Proposed Action must adequately study the various activities which pose significant threats to the ESA listed species; including but not limited to the Mojave Desert Tortoise, and how the proposed action will adversely impact the listed species. Such claims of impact and their level of significance must be based on reliable scientific data that are current and supported by standard rules of scientific analysis. That is, studies must: (1) not be biased in their methodology, (2) not draw conclusions based on inadequate sample size, (3) be conducted with sufficient "control" groups, (4) be verified or repeated, and/or (5) not limited to small or localized populations that do not support area-wide or population-wide extrapolations.
1024	As for the desert tortoise, we have traveled 100's of miles on desert roads and have seen only one near a road and we certainly wouldn't run over any. We have raised them legally ourselves from those found in the valley.
1026	For example, vehicles may cause direct mortality of desert tortoises by crushing burrows that may have tortoises in them (Bury and Luckenback, 2002; Seckendorff Hoff and Marlow, 2002). Routes and vehicle use are associated

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	with reduced desert tortoise densities. Bury and Luckenback (2002) found 3.8 times more desert tortoises in an unused area compared to an adjacent OHV area. The tortoises were heavier, more active, and had more burrows in the non-OHV site.
1026	In order to comply with 43 CFR Part 8342.1, for each route the BLM must consider and document the impacts to wildlife; impacts to wildlife habitat; impacts to vegetation; impacts to threatened and endangered species; impacts to all special status species identified in the West Mojave planning effort; impacts to unusual plant assemblages; impacts to designated critical habitats; impacts to special status areas such as DWMAs and Habitat Conservation Areas; impacts to visual resources; impacts to wilderness character and to wilderness quality lands; impacts to cultural resources; impacts to soils; impacts to air quality; impacts to riparian areas, water quality, local hydrology, and watersheds; contribution to wildfire risk; litter and trash deposition; and effects on invasive species including the contribution of the routes and route system to subsidizing food, water, and perching sites for the common raven, and to the spread of invasive plant species.
1026	Important sensitive resources in this area include desert tortoise, Mojave fringe-toed lizard, Nelson's bighorn sheep, western pond turtle, Mohave tui chub, and important riparian areas such as the Mojave River and Afton Canyon.
1026	The desert tortoise and the West Mojave endemic Mohave ground squirrel are protected under the California Endangered Species Act (CESA). Because the public lands are not necessarily contiguous and include inholdings of private land, the BLM's route designation may impact these state-listed species on private lands. Without adequate analysis of potential impacts and provision of adequate mitigation to reduce those impacts to less than significant levels, the route designation may violate CESA.
1028	There is no documentation or data to support closure of any motorized routes in the project area to improve wildlife connectivity. The existing level of roads and trails does not significantly impact wildlife connectivity, i.e. it functions as such with the existing level of roads and trails and closing any roads or trails to motorized use would not make any measurable difference.
1034	we urge the BLM to keep three principles in mind when crafting the environment document for the proposed amendment for the West Mojave Plan with respect to the Motorized Vehicle Access Element. First, all route designations for motorized vehicles, including off-OHV route designations, must be compatible with recovery of the desert tortoise. The deterioration, fragmentation, and loss of habitat as a result of human activities were primary reasons for the USFWS determination in April 1990 that the Mojave population of the desert tortoise is "threatened" with extinction. Today, the loss or degradation of habitats continues to place the desert tortoise at risk. BLM route designations in the WEMO plan area, then, must be such as to protect the habitat necessary for tortoise recovery.
1042	Motor vehicle roads and trails should not lead to riparian areas, and even hiking trails should be placed to minimize harassment of wildlife or significant disruption of wildlife habitats. This need for hiking trails and trailheads should be part of the discussion in the route designation process.
1058	BLM should emphasize the recovery of special-status species in the design of this designated route network. Since critical desert tortoise habitat and mojave ground squirrel habitat make up a large portion of the West Mojave planning area, routes in these areas should be designated carefully and sparingly. The previous route designation plan has more than 5,000 miles of open routes, which amounts to more than one linear mile of route for every square mile in the planning area. This seems excessive for an area with so much sensitive habitat and so many sensitive species.
1146	Co-ordinate wildlife and routes. There are times when it's not in the best interest of either the species or the vehicle to interfere with each other. One example is the raptor breeding closure of the Robbers Roost area during nesting season. Specific restrictions during certain times is better than closing routes completely.
1289	We would also like to make you aware of information that the U.S. Fish and Wildlife Service has gathered regarding the effects of vehicle use. In general, vehicle use directly and indirectly affects listed species, such as the threatened desert tortoise (Gopherus agassizii) and the endangered Lane Mountain milk-vetch (Astragalus jeagerianus), which occur within the planning area.
1289	Summary of effects of vehicle use on desert tortoises and their habitat from the revised recovery plan (USFWS 2011). Vehicle use has both direct and indirect effects on the desert tortoise and its habitat. All references are available upon request.

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	Threat Name - Motor Vehicle Off Route (A.3) Corollary Threats - Air Pollution (E.1) Description - Off-highway vehicle use can contribute to air pollution from emissions and surface disturbance (Ourenetal. 2007) Threat Name - Motor Vehicles Off Route (A.3) Corollary Threats - Fire Potential (A.5) Description - Impacts from off-highway vehicle use include increases in numbers and locations of wildfires (Brooks 2009; Lei 2009). Threat Name - Motor Vehicles Off Route (A.3) Corollary Threats - Human Acces (A.1) Description - Repeated off~highway vehicle off route leads to unauthorized new routes (Brooks and Lair 2009). Unauthorized off-highway vehicle use also results in increased human access and associated impacts such as . deliberately maiming ,killing,and removal of tortoises (USFWS2010). Threat Name - Motor Vehicles Off Route (A.3) Corollary Threats -INvasive plants (A.4) Description - Vehicles serve as a major vector in dispersal of non- (A.3.) native species (Brooks and Lair 2005). Threat Name - Motor Vehicles Off Route (A.3) Corollary Threats - Surface Disturbance (A.1) Description - One of the most significant ecological implications of off highway vehicle routes is the exacerbation of erosion and changes in drainage'pattems(Bury and Luckenbach 2002; Brooks and Lair 2005).OHVs.disturb soil crusts; abrade and pulverize soils, and generate windsurrents (Lovich and Bainbridge, 1999). Off~highway vehicle activity can also disturb fragile cyanobacterial-lichen soil crusts, a .dominant source of nitrogen in desert ecosystems(Belnap 1996). Threat Name - Motor Vehicles Off Route (A.3) Corollary Threats - Toxicants (C.2) Description - ORV emissions also contain a variety of heavy metals, including zinc, copper, nickel, chromium, and lead (Ouren et al. 2007). Threat Name - Motor Vehicles on Unpaved (A.3) Corollary Threats - Air Pollution (E.1) Description - Emissions from motor vehicles contributetoair.p(}Hution:' (Faiz etal.1996) Threat Name - Motor Vehicles on Unpaved (A.3) Corollary Threats - Fire Potential (A.5) Description - Most vehicle-related fires are ignited by the hot metal from exhaust pipes. Threat Name - Motor Vehicles on Unpaved (A.3) Corollary Threats - Invasive plants (A.4) Description - Vehicles serVe as a major vector in dispersal of non-native species(Brooks, and Lair 2005); Threat Name - Motor Vehicles on Unpaved (A.3) Corollary Threats -Motor Vehicles Off Route/Illegal OHV Use((A.5) Description - Off route motor vehicles are facilitated by existing roads and access (USFWS 2010).

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	Threat Name - Motor Vehicles on Unpaved (A.3) Corollary Threats -Surface disturbance (A.1) Description - Irnpacts from vehicles on unpaced roads include destruction of soil crusts, and soil erosion and compaction (Brooks and Lair 2005;Brooks 2009; Lei 2009), Threat Name - Motor Vehicles on Unpaved (A.3) Corollary Threats - Toxicants (C.2) Description - Fuel and oil associated with motor vehicles can result in toxic spills; motor emissions also contain a variety of heavy metals (Chafee and Berry 2006). Threat Name - Unpaved roades (A.2) Corollary Threats - Human Access (A.1) Description - Roads provIde the ability to enter or passin and from a place from various points within desert tortoise habitat. Dirt roads used for maintenance-related activities provide access to less disturbed habitat (Brum et al. 1983). Threat Name - Unpaved roades (A.2) Corollary Threats - Surface Disturbance (A.1) Description - Disruption or removal of natural surface soil and vegetation within desert tortoise habitat can result from construction and maintenance of unpaved roads.
1289	Summary of effects of vehicle use on desert tortoises and their habitat from the revised recovery plan (USFWS 2011). Vehicle use has both direct and indirect effects on the desert tortoise and its habitat. All references are available upon request. Threat - Motor Vehicles Off Route (A.3) Stress - Crushing Description - Impacts from Off Highway Vehicle use include mortality of tortoises on the surface and below ground (Brooks 2009; Lei 2009) Threat - Motor Vehicles On Paved Roads (A.3) Stress - Crushing Description - Motor vehicles on paved roads can accidentally strike and kill desert tortoises (USFWS 1994). Hoff and Marlow (2002) demonstrated that there is a detectable impact on the abundance of desert tortoise sign adjacent to roads and highways with traffic levels from 220 to over 5,000 vehicles per day. This supports LaRue (1993) and Boarman et al. (1997), wherein depauperate desert tortoise populations were observed along highways. Subsequent research shows that populations may be despressed in a zone at least as far as 0.4 kilometer (0.25 mile) from the roadway (Boarman and Sazaki 2006). Threat - Motor Vehicles On Paved Roads (A.3) Stress - Deliberate maiming or killing (B.2) Description - Motor vehicles on paved roads can deliberately strike and kill desert tortoises Threat - Motor Vehicles Off Route (A.3) Stress - Entrapment/burial Description - Impacts from off-highway vehicle use include collapsing of desert tortoise burrows (Brooks 2009; Lei 2009); such collapses may entomb and kill those animals. Threat - Motor Vehicles Off Route (A.3) Stress - Loss of shelter and breeding sites Description - Impacts from off-highway vehicle use include collapsing of desert tortoise burrows and damage or destruction of annual and perennial plants and soil crusts (Brooks 2009; Lei 2009). Off-highway vehicle activities remain an important source of habitat degradation and could result in reductions in desert tortoise densities (Boarman 2002). Threat - Unpaved Roads (A.2)

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	Stress - Loss of shelter and breeding sites Description - Direct effects to desert tortoise habitat from roads and routes occur during initial stages of construction when vegetation and soils are lost or severely degraded. Construction of these features can result in physical and chemical changes to soils within unpaved roadways as well as in adjacent areas (Brooks and Lair 2005).
43 CFR 8342.1(c) – Route Designation Criterion C	
1002	High use hiking trails should be recognized, specifically in the Juniper, Ridgecrest and East Sierra subregions. These trails should be limited to hiking use and signed accordingly.
1033	Off-road routes should not terminate at or near the State ROW. Too often this activity is distracting to drivers, and continued soil impacts may affect drainage patterns.
1033	Routes cannot cross controlled access highways, like all freeways, except at existing public road connections.
1046	the BLM must balance low impact recreation with motorized recreation.
1046	6) Definitions of special use trails: What is the BLM definition of "touring"? How wide is a single track and what is its use? How wide is a motorcycle only route? Vehicle touring is appropriate in limited use areas. Are Motorcycle only routes compatible with that description? Motorcycle riders continue to be the cause of an increasing web of illegal routes. In the Juniper Sub Region, the currently designated motorcycle only routes are about 10 feet wide and used by quads, side by sides, and even jeeps and trucks. They are no longer favored by motorcycle riders. Motorcycle only routes tend to be used by people who are challenging their riding skills more than touring. All vehicle touring could be accomplished using the same open routes.
1046	7) Street Legal Vehicles ONLY: BLM must consider limiting the use of "limited use" areas such as the Juniper Sub Region to street legal vehicles only. While the type of vehicle does not necessarily have a different impact on the route, the way in which it is driven does have a significantly different impact on the area. Since street legal vehicles require a licensed driver, a citation could have more significance for that driver. The drivers have to be older than kids on green sticker vehicles. Street legal vehicles require insurance. Street legal vehicles have a more visible identification plate. All in all, there is more responsible behavior with a street legal vehicle, rather than a vehicle that is considered as a toy. If the BLM allows green sticker vehicles in the "limited Use" areas, then how the people access those areas must be taken into consideration and realize the provision for "staging areas". Staging areas for off road vehicles and horses become large areas denuded of vegetation, cause dust and noise problems and must be carefully located. Staging areas usually become enlarged over time and therefore must be "contained" with boundary fences and barriers. Even with such considerations, we find that staging areas are not appropriate in the Juniper Sub Region where vehicle touring (not OHV play) is currently acceptable.
1046	Motorized access points should be carefully evaluated so as not to disturb neighbors, impact soils that cause erosion and flooding. Non-motorized access must be identified and clearly marked on the ground, and balanced with motorized access.
1055	I have observed a steady deterioration in residential quality of life and peaceful enjoyment both for myself and numerous neighbors. This can directly be attributed to the reckless disregard displayed by the BLM's implementation of off - road recreation routes throughout our community coupled with a demonstrated inability to manage the adverse affects of the off road recreation being promoted and abetted by these routes.
1055	all routes be eliminated in areas of private/public lands interface/checkerboard land use pattern;
1097	There is also the issue of trespass and individual trespass and the law enforcement issue that go along with opening an off road vehicle route through an already established community.
1097	The loss of residential property values that may come from the degradation to our neighborhoods by off road vehicles.
1098	Motorized vehicle use interferes with hiking and non-motorized vehicle use. It is noisy, dusty and not compatible with walkers, hunters, wildlife and bicyclists, whereas the other four groups ARE compatible with each other. Can there be greater seperation of routes between OHV users and all the other people and animals who use the land? I have seen agitation arise between a hunter whose dog was almost run over by OHV users, resulting in threats, whereas hunters have no argument with hikers bicyclists or horseriders.
1101	Illegal DRV activity on BLM lands, especially in areas of private/public land interface has caused extensive conflict between residents and businesses and riders. Large groupings of DRYs on holiday weekends have widespread lawlessness, accidents, deaths and extensive damage to the environment.
1108	Existing dirt road and trails are oriented for four wheel drive vehicles, two wheeled vehicles need single-track trails. These trails exist, however most have been fenced off allowing two-wheeled access. This has created a dangerous condition in mixing four-wheeled and two-wheeled vehicles.

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1163	The issue of private property is also a big key
1250	When designating routes of travel for motorized recreation there must be consideration of other users. Private property owners are greatly impacted by trespass, noise, air quality and even harassment when routes are too close to their property or when routes come up to the property boundaries. There are also dangerous encounters when dirt roads are used by local residents, people touring and OHV and OHV play activities.
1250	Quiet and solitude sought by many visitors also needs to be considered when designating routes, along with the protections of cultural sites. Some routes have gone through habitation sites. Routes must guide OHV's away from these areas.
1284	In fact, the BLM has prioritized off-road recreation above all other uses and values in the WEMO. These policies have also had significant impacts on private property by encouraging trespass off of established routes and by failing to provide adequate law enforcement Studies have shown that the majority of the time off-road vehicles breach designated routes.
1284	Illegal ORV activity on BLM lands, especially in areas of private/public land interface has caused extensive conflict between residents and businesses and riders. Large groupings of ORVs on holiday weekends have led to widespread lawlessness, accidents, deaths and extensive damage to the environment To date, the BLM has failed in its mandate to recover costs for large gatherings and events on public lands thereby shifting the financial burden from event organizers to the taxpayer. Rural communities adjacent to these large-scale events have suffered from the fallout of these events including lawlessness, trespass and damage to private property.
1284	The designation of open ORV routes must be accompanied by a route terminus sign since those routes without such a sign encourages trespass onto private property, public lands and roads off-limits to green sticker vehicles. This is a very serious problem since without the indication of a terminus, riders continue on designated routes past their ends. This leads to trespass on private and public lands and many of these routes cross rural roads leading to the potential for collision with local traffic. The failure of the BLM to place route terminus signs on designated routes places the agency in a position of liability for potential accidents and trespass.
43 CFR 8342.1(d) – Route Designation Criterion D	
1002	Special areas and the resources they are intended to protect need to be specifically addressed in all route designation endeavors. All tools available to inform route designation decisions should be employed, including the use of site-specific evaluations (e.g., field analysis, PFC assessment, aerial photo analysis, etc.). On-the-ground action implementation in special areas should also be a priority, particularly where non-compliant vehicle use is known to occur.
1006	Established conservation areas for rare resources, including Areas of Critical Environmental Concern (ACECs), Desert Wildlife Management Areas (DWMAs), Mohave Ground Squirrel (MGS) Conservation Area etc. should be foci for substantial route reductions based on the plethora of science that identifies detrimental environmental effects of roads, routes and trails.
1015	The BLM proposes to include as part of the road designation and amendment of the CDCA Plan additional changes which are not specifically a part of the road designation process. Should the BLM proceed on this course the Vehicle Access Element of the plan needs to be amended to specifically reflect the wording contained in the California Desert Protection Act with respect to exempt vehicle access in Wilderness Areas.
1016	43 C.F.R. 8342.1 (d) does not apply to the Congressionally Designated Wilderness within the California Desert Conservation Area and BLM may not use this CFR in its route designation process around wilderness. The California Desert Protection Act clearly states that there shall be no buffer zones around CDCA Wilderness. All of the lands up to the boundary of the congressionally designated Wilderness areas may be utilized.
1016	The Society for the Protection and Care of Wildlife believes the process should include

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	the designation as open, all routes which are congressionally designated open ….”cherry stems and wilderness boundary roads” as part of the Wilderness process.
1017	The BLM proposes to include as part of the road designation process and amendment of the CDCA Plan, additional changes which are not specifically a part of the road designation process. Should the BLM proceed on this course the Vehicle Access Element of the plan needs to be amended to specifically reflect the wording contained in the California Desert Protection Act with respect to exempt vehicle access in Wilderness areas. The Closed section in Chapter 3 should read, “No vehicle travel is allowed.” Except that Vehicle Access is authorized for the purposes of maintaining and repairing and in times of drought carrying water to guzzlers, and tanks and maintaining wells, and maintaining seeps, springs, and tinajas. Roads leading to the guzzlers, wells, seeps, springs tinajas and tanks will not be closed or eliminated but may be gated with locks.
1017	Routes should be allowed to terminate at the edge of wilderness areas,
1025	Established conservation areas for rare resources, including Areas of Critical Environmental Concern (ACECs), Desert Wildlife Management Areas (DWMAs), Mohave Ground Squirrel (MGS) Conservation Area etc. should be foci for substantial route reductions based on the plethora of science that identifies detrimental environmental effects of roads, routes and trails.
1025	Certainly legislatively designated wilderness areas and wilderness study areas, should not have routes in them. Routes adjacent to these areas should be analyzed for possible closure based on the potential for or actual documented illegal intrusions.
1026	Provide a quantitative estimate of the amount of each route in special status areas such as designated critical habitats, USFWS identified priority habitat linkages between desert tortoise conservation areas, Area of Critical Environmental Concern, Wilderness, Wilderness Study Areas and Habitat Management Areas. Document all sensitive resources including sensitive species habitats and unusual plant assemblages along each route. Provide a quantitative estimate of the amount of these sensitive resources impacted by each route.
1055	all routes eliminated adjacent to Areas of Critical Environmental Concern (ACEC) and state and federal designated wilderness areas;
1072	I really disapprove of opening up Wilderness areas to motor vehicles.
1095	*No ORVs next to ACECs, Wilderness areas and lands with endangered, threatened or sensitive species.
1100	Routes should be allowed to terminate at the edge of wilderness areas. This facilitates the public non-motorized access to the wilderness interior and complies with the “no wilderness buffer zones”. Nor should there be explicit buffer zones adjacent to military land.
1101	We recommend that: all routes be eliminated in areas of privatejpublic lands interface/checkerboard land use pattern; all routes eliminated in washes and other ephemeral waterways; all routes eliminated adjacent to Areas of Critical Environmental Concern (ACEC) and state and federal designated wilderness areas;
1284	In summary, we recommend that: all routes be eliminated in areas of private/public lands interface/checkerboard land use pattern; all routes eliminated in washes and other ephemeral waterways; all routes eliminated adjacent to Areas of Critical Environmental Concern (ACEC) and state and federal designated wilderness areas; all routes eliminated in the proximity of critical habitat and habitat for species of special concern; no routes in wildlife corridors; all routes eliminated in areas out-of-compliance with state and federal air quality standards; and, all routes eliminated that may threaten cultural resources, sacred sites and tribal lands.
Network Purpose and Need	
1001	If any routes have been closed in the past, we ask that they be reopened or be replaced by new routes serving those collecting locations. Similarly, we ask that any routes proposed to be closed under the new plan be replaced so that no further access is lost entirely.
1001	many rockhounds are elderlyor handicapped and unable to travel much of any distance or carry weight very far in any

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	event. This is further reasonwhy we ask that you do not close or place restrictions on any routes that provide access to rock, gem or mineral collectinglocations, or that you replace any that have been or are proposed to be closed.
1001	The proposed WEMO route plan should not be allowed to authorize further "take" of public access for purposes such as rockhounding, OHV access and other forms of recreation. Recreation and public access should not be limited or curtailed to accommodate the possible loss of species resulting from other activities as that would result in additional "taking" of public access for recreational purposes.
1001	The following is a list of collecting locations of great importance to rock, gem and mineral locations for which we request that access be maintained or restored: Calico Mountains (2 maps attached) Mule Canyon (1 map attached) Stoddard Well Area (2 maps attached) Boron (2 maps attached) Castle Butte Area (3 maps attached) Bristol Mountains (1 map attached) Cady Mountains – South and East (3 maps attached) – (Note: no map of "Sandy Wash" is included herewith, but the site was found on BLM's maps while working in coordination with Peg Margosian, and is mentioned in CN1183202.) "Manix" (1 map attached) Clay Mine Road (1 map attached) Cuddeback Mountains (1 map attached) Darwin Hills (1 map attached) Lavic Siding (3 maps attached) Kramer Area (2 maps attached) Last Chance Canyon (1 map attached) Newberry (1 map attached) Black Canyon (1 map attached) "Pleistocene Lake", north of I-15 near Dunn (1 map attached) Cadiz (1 map attached) Chambless (1 map attached) Hector Hills (1 map attached) Hector Road North (1 map attached) Ord Mountain (1 map attached) Hidden Hills (1 map attached) Afton Canyon (1 map attached) – Note: Rockhounds request that vehicular and motorized access to Baxter Wash Loop and to Pyramid Canyon be restored. Much of Afton Canyon and the central Cady Mountains are inaccessible to all but the extremely fit due to route closures. Alvord Hills (1 map attached) El Paso Mountains (1 map attached) Sheep Springs (1 map attached) Bristol Mountains – Strawberry Onyx (1 map attached) – Note: Many rockhounds cannot walk the 2.2 miles from the road to the collecting location since the road was closed and therefore request that the road be reopened to allow vehicular and motorized access. Note: Additional supplementary location maps and other data may be added at a later date as it is received from fellow rockhounds.
1005	Many of the OHV roads and trails lead to private property, and access to those properties should not be compromised.
1007	Trails that are currently open should remain open, since other BLM activities will further reduce the OHV open are footprint for the future solar projects and 29 Palms Marine Base expansion, and thereby criminalize the OHV by eliminating the open areas making it illegal to recreate anywhere else.
1012	Major road systems leading to historically used/visited destinations must remainopen.
1012	All roads to ranch/range improvements – waters – etc. remain open or gated.
1013	Single-track and quad-width trails provide a very different experience for the public compared to using full size roads. The BLM should strive to provide for the ever-growing single-track and quad recreation population since local area fulfillment of their needs is under-achieving.
1013	We have all witnessed the very real dangers of forcing everyone from children to grandparents onto the same road as

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	four-wheeled off-road vehicles capable of high speeds. To address this safety issue, we propose the BLM add single-track trails and quad-width trails in order to help separate these uses from full-size road vehicles and improve safe travel for all.
1016	All routes leading to a seep, spring, tinaja, guzzler, tank, or well, used to provide water for wildlife, should be designated open or as administratively limited.
1017	No more roads to gem and or mineral collecting areas should be closed.
1023	The Proposed Action should continue to authorize, maintain, and enhance the recreational use of the land included in the West Mojave (WEMO) region covered, including motorized recreation, hiking, camping, mountain biking, sightseeing, and horseback riding, as long as such recreational use is consistent with applicable law and existing land use planning documents.
1024	3. Any element affecting travel should include and recognize the right to Rockhound and collect fossils as allowed by Federal law
1024	Any travel plan should recognize the need for those that qualify as disabled and senior citizens who need to have easy access to enjoy and use our public lands. We can't walk for long distances, carrying equipment or even a few rocks picked up.
1024	Such plans need to recognize the need for camping in remote areas and they need to be more than one car length from a dirty dusty road for health and safety reasons.
1027	Many of the OHV roads and trails lead to private property, and access to those properties should not be compromised.
1028	Multiple-use visitors also include physically challenged visitors who must use wheeled vehicles to visit public lands. All of these multiple-use visitors use roads and motorized trails for their recreational purposes and the decision must take into account motorized designations serve many recreation activities, not just recreational trail riding.
1028	The Purpose and Need does not adequately address and recognize the current highly popular level of motorized access and recreation and the need for increased motorized opportunities.
1028	There is a significant need for Youth Loops. Youth Loops would include a small area of several acres, either contained by fencing or clearly marked boundary, with short, tight trail system that is designed to entertain kids under adult supervision. The youth loop offers an alternative to unauthorized routes near camp areas and riding in campgrounds. A good example to refer to is the Lewis and Clark National Forest Travel Plan for the Little Belts. We request that this important need be adequately addressed in the preferred alternative.
1028	Single-track challenge trails are needed for expert riders and trials type motorcycles.
1028	The West Mojave Area project area has far less than the desired number of motorized trails. This creates two problems. First, the public will tend to “explore” closed routes in an attempt to salvage a decent outing. Secondly, it produces an unsatisfactory OHV experience.
1028	The evaluation must adequately consider the growing popularity of motorized recreation, the aging population and their needs for motorized access, and the increased recreation time that the aging population has and looked forward to enjoying public lands in their motor vehicles.
1028	We are concerned about the loss of access and impact on the handicapped, elderly, and physically impaired produced by each motorized closure to historic sites and traditional use areas.
1035	It is important to us to have access to the area's remaining collecting sites to gather mineral specimens.
1037	Due consideration must be afforded continued motorized access to the West Mojave (WEMO)of theproposed project area. The region is a popular destination spot for multiple forms ofrecreation, including but not limited to: four-wheel drive touring/driving for pleasure,rockhounding, photography, and wildlife viewing. These are activities that cannot be enjoyed,or replicated, in that diversity in other regions.
1037	The loss of access to the West Mojave (WEMO) region for recreation opportunity is a direct loss. There are also indirect impacts that would result should this Proposed Action be approved and implemented causing displacement of recreational activities. Those costs include, but are not limited to: (1) the increased enforcement required at other sites when displaced recreational users seek out other areas that may be poorly identified as wildlife preserves or other resource rich areas; (2) the loss of biological resources or habitat at other sites that displaced recreational users may utilize; (3) the loss of nature education; (4) the loss of outdoor recreation opportunities; (5) the loss of outdoor access and experiences for children in the community; (6) the loss of familial traditions, custom, and

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	culture of recreational and nature-oriented activities in the region; and (7) the loss of the region's history and traditions, specifically with respect to mining and recreational activities.
1038	I don't believe any road present before 1980 should be closed. I also thinks all mining access should be allowed. EP 15 is my access to my and other miners claims.
1042	the BLM must consider the many activities that abound in the area and not just OHV touring.
1042	the BLM must contact the property owner to determine whether that route should be designated open, limited to authorized access, or closed. If no contact is made with the property owner, the route should be closed.
1048	I am requestion gthat the BLM not close or restrict our public land any further
1052	I don't feel we should close all routes but one into an area , as this channels people into one over used route also increasing likelihood for accidents. With closure of OHV areas there will be a huge amount of increased traffic for those few areas allowed access.
1053	please retain as much trails as possible. The longer trails are safer as they reduce the hazard of two-way traffic. Keeping trails connected is safer as well. Please implement single track trails for motorcycles.
1056	I think sheltering places to protect wildlife is rule. but, as a rock hound, being able to approach areas for stone is also a necessity. I comment that ways to balance the two be approached
1069	We need to maintain roads into historic, reparian, cultural, geologic, and scenic sites so that All citizens have access to them, inculding the aged and handicapped. Sites that are sensitive such as springs and Indian ruins should be secured and roads should probably end 100' away, as a safeguard.
1070	Please consider keeping our public lands accessible by motorized vehicles and continue to allow rock collecting on public lands.
1071	But I and others, still think that a couple of parking lots for ORV'S would be a good thing,
1082	The closure of existing roads that provide access to federal mining claims creates a particular hardship forsmall scale miners who own or lease federal mining claims and pay annual maintenance fees to the BLM. Thisis so because the nature of mining, even small scale mining, requires the use of tools -- typically picks andshovels and small scale dry washers [hand or battery operated consistent with current BLM regulations] andmetal detectors. If a road is posted as closed, there is no practical alternative to the use of a motorized vehiclefor accessing these claim locations with the aforesaid types of equipment. The amount of travel is minimal,typically consisting of a drive directly to the claim site where the motorized vehicle remains until the time todepart, i.e., one trip in and one trip out. This stands in sharp contrast to recreational bikers or ATVers who havethe option to choose other roads that are not closed, who pay no annual maintenance fee and who do not own orlease federal mining claims.
1083	subject = BLM Road Closures FeedbackType = Comment request_comment = I am distressed to hear of the possibility of road closures in the Mojave Desert. I ride my horse in many of the areas you propose to close to traffic. I certainly support any organization that opposes these closures.
1087	Gem and Mineral Collectors have lost access to 98 percent of their collecting areas. No roads to collecting areas and mines should be closed.
1088	I am writing to respectfully ask that no more restrictions be put in place for motorized vehicles in the WEMO area.
1089	There would be better compliance if there was more trail opportunity, This is bottom line fact
1091	The WEMO Plan for closing a number ofroads on our public property will not only affect the use by prospecting organizations, gem and mineral groups, other outdoor clubs and also a large segment ofthe local community as well. Many area people use these roads for recreation and family outings.
1100	More single track routes need to be designated. One of the short falls of the interim designation process is that BLM has designated wide basic roads and not enough single track trails for motorcycles and bicycles. One unfortunate result of compliance and restoration efforts has been the loss of popular networks of historic but undesignated single-track motorcycle trails. The BLM should include these in the route designation pool.
1100	Gem and Mineral collectors have lost access to 98 percent of collecting areas in the California Desert Conservation Area which was 87 percent of California collecting. No more roads to gem and or mineral collecting areas should be closed.
1100	Roads leading to extreme riding or driving places, which are few and far between and require specialized terrain, should not be closed.
1103	Vertebrate fossils from the Mojave Desert are important to the North American continent for interpretation of climate, faults, floods, and continental biostratigraphy. Such assistance to the BLM

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	cannot be accomplished without legal access to select sedimentary formations. The established routes that need to remain open have been in use by paleontologists and campers for 60 to 100 years. Preliminary data justifying the significance of, and continued field research is available (Savage and Downs, 1954; Kurten and Anderson, 1980, Lundelius et al., 1987; Jefferson, 2008a).
1110	 I am the Vice President of the Orange County 49er\'s. We have eight claims in thearea with over 250 members that use our claims and prospect the desert al the the roadclosures are going to effect us and will end up in court if that is nessesary, as you can notrestrict access to a mining claim.
1132	Under the rules pertaining to the Paleontological Resources Protection Act, professional and trained vertebrate paleontologists are the only qualified persons who can legally help the BLM manage these non-renewable resources. I have been involved in these studies for over 50 years, and it is absolutely essential that we maintain access to areas with such resources to facilitate ongoing research and periodic prospection for fossils as ongoing weathering exposes new specimens.
1138	I am going to speak only for myself and those with common interest, which is rockhounding and enjoyment of the desert, which I have been doing for the past approximately 60 years. Please take into account that we are not those who leave the roads, dirt or paved, and who will not destroy any part of the desert. So many of us, like myself, are well up in years and cannot hike into our favorite areas, and those who might could easily get themselves into a world of trouble. All we ask is vehicle access on existing roads
1139	These areas need to remain accessible to rockhounds to enjoy their hobby. One is the Paul Bunyan Agate site off Copper City Road. By the signs found it appears to be open now. Another is the Butler Onyx site on the north side of the Calico Mountains. Another is the Sagenite Agate site in the Calico Mountains. The road is open towards the site but is needs to transverse part of the road to a spring, and that is closed, but the Sagenite site continues off and WEMO_1139 past the spring. At the moment it appears that the Sagenite site is unavailable due to the segment of road closure to the spring. The Sagenite site should be open for access. Another is the petrified palm in the Mule Canyon, Calico Mountains. Another is the Lavic Jasper/chalcedony sites in the Pisgah crater, Lavic Siding, Cady Mountain bajada area. All of the Cady Mountains should remain accessible on existing desert roads. This is an area that has been visited by rockhounds for years and continues unspoiled with rockhound exploration. There are many areas that dirt roads enter the Cady Mountains -- they should remain open. The road to the Strawberry onyx on the east side of Broadwell Lake is now signed closed. This classic onyx site should be open to rockhounds. Why is this area designated closed? Please change the category. Further on the west of Barstow is the Kramer Hills area that has agate & jasper. This should be open for rockhounds. And on over to the Boron, California City area are more sites famous for their agate & jasper. These areas should also be open.
1146	If you close all the remote areas andlor make them unavailable, to most of the recreating public, those of us that don't want to be part of the herd, have no place to go. Being officially mobility disabled, I can still find serenity in those remote places I can drive to. I use my Jeep as a 4 wheel drive wheelchair. There are lots of us older folks with similar problems, desire access to those areas that are less traveled.
1146	Allow access to critical areas of the desert by volunteers servicing critical habitat, like those servicing wildlife guzzlers, fire suppression personnel removing brush around cabin sites, and those removing invasive species in isolated areas. Having to walk into these areas many times negates the effectiveness of the volunteers.
1146	Make allowances for those less able to move around normally. Time stressed local citizens may want to spend a short amount of time in an area Senior citizens, the mobility handicapped, and those otherwise inhibited cannot walk 10 miles a day, or climb Telescope Peak, or ride a horse through the backcountry. They still deserve to participate in the glory and serenity of the desert!
1155	I recommend that routes indicated on the attached maps and table be left open for vehicular access by collectors.
1158	I desire to visit sites used historically to collect minerals and semi-precious gemstones, est. by the indian wells gem and mineral society over 50 years ago. These sites need vehicle access to transport hand tools and rocks
1159	Open routes, allow camping hiking, climbing, and rock hounding
1159	Understanding that open routes are necessary to camp, hike, and climb, will allow for a more balenced planning that does not lock people and families out of the desert.
1184	Love to see more single tracks open, like technical trails.

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1198	Need more open space for riding
1200	to many people to little trails
1201	Open up more trails
1202	Please open up more trails
1203	more trails makes it safe
1204	Open the trails
1205	Open up more trails
1206	Open up more trails
1207	Keep all trails open
1208	Please stop closing all the fun trails
1211	Keep the trails open
1212	Safety
1213	Open more trails so it is safer
1214	Open new trails
1215	Open new ones
1220	If there were more opportunities to explore this great land I believe it would attract more new comers and retain reoccuurring folks. It would make me more conforatable to ride and I imagine, reduce accidents due to overpopulation
1221	Would like to see more singletrack
1222	More single track routes need to be installed for not only safety concerns
1225	I would like a trail to the store that I can ride that doesn't have dunebuggies on it
1227	We would like to see more open trails
1238	Would like to see more open trails to enjoy
1242	Safe trail systems for all ages and skill levels
1256	In 1992 this area was taken from the open area. This area had been raced for 20 years. If Johnson Vally is lost to recreation the best place to replace it is this area. [Map depicting area southeast of Ridgecrest, CA]
1263	Many of our club, myself included, are senior citizens who have enjoyed the beauty of the desert for many years. We still enjoy the outdoors and the uniqueness of the Mojave Desert but we are not able to hike or walk for long distances. We need roads to get to some of our favorite areas.
1266	Many of our club, myself included, are senior citizens who have enjoyed the desert for many years. We still enjoy the outdoors and the beauty of the Mojave Desert but we are not able to hike or walk for long distances. We need roads to get to some of our favorite areas
1269	Enclosed is copies of various claims used by the High Desert Gold Diggers, Valley Prospectors, Orange Co 49 'Ers that I have in my possession. The areas include: Coolgardie Area; Lane Mountain Area; El Paso Mountain (Randsburg) Area; Ord Mining District; Dale Mining District. Also included is the copies of the GPAA (Gold Prospectors Of America) claims in the Coolgardie Area.
1287	A large number of rockhounds (and other recreational users) are elderly or disabled persons who have limited physical abilities and therefore require motorized vehicular access to public collecting areas and other recreational sites. These persons do not have the ability to hike any significant distance to access collecting locations and other recreational destinations. Therefore, closing public motorized vehicular routes that serve collecting sites and other recreational destinations constitutes unfair discrimination against them in particular. We strongly recommend that the BLM consider this in analyzing the routes that it will designate as "open". Public lands belong to all of us, not just those who are healthy enough to hike to their chosen recreational destination.
Range of Alternatives	
1006	As part of this process, the BLM should include in the EIS alternatives that are more protective of the environment, including at least one low density alternative that includes a mileage/density cap (miles of road per hectare) for designated routes based on special designations (ACEC, DWMA, WHMA, etc.), MUC classes and the conservation status and goals. Because of the many unauthorized vehicle routes created after 1980, the density of routes today in the West Mojave is far higher than is needed for travel, reasonable recreation, or access to identified destinations.
1017	The BLM has indicated it proposes to develop only one process utilizing one criteria for the route designation process. The SPCW believes upon reading the “remand” document that the BLM has an obligation to develop more than one route designation process and more than one road designation scheme and that there be differing route designation

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	designs in those alternatives. We believe the court is asking for alternatives from which she may pick.
1025	The definition of a "viable" route network needs to be explicit and alternative definitions explored. This could include analysis of the minimum route system needed to travel across a region, the minimum needed for reasonable access to recreational destinations, etc. The EIS should also consider at least one alternative with user limits at open areas.
1025	The BLM should clearly state what the proposed plan amendment is in the EIS and should include a number of alternative route designations scenarios.
1028	Reasonable alternatives to motorized closures must be pursued. The continual loss of motorized recreational opportunities is our primary concern. Because of the significant cumulative effect of motorized closures at this point in time, we feel strongly that there can be "no net loss" of motorized recreational opportunities with the Environmental Assessments for 8 Travel Management Areas within the West Mojave Area.
1028	We ask that management for sharing of these lands for multiple-use be selected as the preferred alternative. Sharing would include a 50/50 sharing and equal opportunity of non-motorized to motorized trails.
1028	The Environmental Assessments for 8 Travel Management Areas within the West Mojave Area must include the evaluation of a pro-recreation alternative so that motorized recreationists do not end up losing before the process begins. A true pro-recreation alternative should be based on the actual usage of the area which is 99% motorized multiple-use in the case of the West Mojave Area. A reasonable alternative should include: a. Sharing non-motorized trails with mountain bikes and motorcycles, b. Creating new mountain bike and motorcycle trails, c. Creating ATV trails from roadbeds that both currently open and closed, d. Creating new ATV trails e. Creating new ATV trails that connect with converted roadbeds to create loops, and, f. Establishment of 4x4 challenge routes using roadbeds that are both currently open and closed including historic mining routes.
1028	An adequate and reasonable preferred alternative would include an adequate quantity and quality of beginning, intermediate, and advanced routes and trails for a wide cross-section of motorized visitors including motorcycles, ATVs, and four-wheel drive vehicles. Additionally, the quantity and quality of motorized routes would be at least equal to the quantity and quality of non-motorized routes. This is the yard stick that the team should measure travel plan alternatives by.
1028	Therefore, it is incumbent upon the project team to formulate at least one alternative that maximizes motorized recreation, or at least does not reduce motorized recreational opportunities in the planning area.
1028	All roads to be closed to full-size vehicles should be converted to atv routes. This is a reasonable alternative for all existing roads.
1028	The preferred alternative must provide for an adequate number of routes as required to provide access to the many historic mines and cabins and an adequate number of dispersed campsites and trailheads.
1028	The existing level of access and motorized recreation is a reasonable starting position and alternative. An even fairer position given that this should be a travel plan seeking to address the needs of the public for motorized access and recreation would be an alternative based on an enhanced level of opportunity.
1042	We expect the BLM to fully consider a full range of alternatives that may even result in a reduction of overall mileage and/or elimination of "motorcycle only' routes in sensitive areas of the Juniper Sub Region.
1042	If the BLM does include an alternative which includes "motorcycle only" or "single track" routes or (other special use routes) we expect the BLM to fully disclose the definition of such a route, how wide it is, whether the 300' stopping/parking rule applies, if the route is open for 3 or 4 wheel vehicles, etc. and how the BLM intends to ensure that such routes will be managed and maintained so as not to become full width routes.
1087	The BLM has indicated it proposes to develop only one process utilizing one criteria for the route designation process. We believe, upon reading the "remand" document, that the BLM has an obligation to develop more than one route designation process and more than one road designation scheme and that there be differing route designation designs in those alternatives. We believe the court is asking for alternatives from which they may pick.
1100	The BLM has indicated it proposes to develop only one process utilizing one criteria for the route designation process. The RACC believes upon reading the "remand" document that the BLM has an obligation to develop more than one route designation process and more than one road designation scheme and that there be differing route designation designs in those alternatives. We believe the court is asking for alternatives from which she may pick.
1163	In the Big picture of WEMO, let me say that because of the lawsuit and the expectations to have alternatives, I feel that

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	the need for more single track, 50 inches or less, is a desirable goal for those who want that type of experience.
1289	Our primary goal in providing these comments is to request that you consider an alternative for amending the motorized vehicle access element in a manner that maximizes the potential for the recovery of listed species and degraded habitat.
Data and Route Inventory	
1001	We recommend that the BLM include a process by which geographic information reflecting the interests of rockhounding, other forms of recreation, and public access be gathered and inventoried and clearly identified on an official map set for the decision making process. We know that rockhounds want to contribute to this effort, but do not have the resources to map the information themselves, nor should they be assigned the burden to do so.
1001	In addition, they have information regarding rocks, gems, minerals and fossils found in their areas which they offer to the public on their websites. Books have been published by authors such as Mary Francis Strong that identify rocks, gems, minerals and fossils found in the Southern California deserts and the locations in which they are found. Historic publications such as Desert Magazine which document rock, gem and mineral collecting locations in the Southern California Desert District and beyond have been digitized and are available online free of charge. All of these sources should be utilized by the BLM in identifying collecting locations and the routes needed to access them so that potential impacts to the public's access to them can be considered and avoided or mitigated.
1001	We incorporate by reference the collecting locations listed in all editions of the well respected and well-read books such as Rockhounding California by Gail A. Butler and Gem Trails of Southern California by James R. Mitchell, as well as the collecting locations listed in Desert Magazine and in all books authored by Mary Francis Strong on the topic, and request that access to each of the collecting locations listed therein be maintained or reopened.
1001	We also incorporate by reference collecting locations listed and reflected in the California Desert District Hobby Collection Map and accompanying index produced by R. Waiwood for the BLM California Desert District in January, 2003, and any additions thereto, and request that access to each of the collecting locations listed therein be maintained or reopened.
1001	We further incorporate by reference the GIS information prepared by Peg Margosian, GIS Specialist of BLM's district office in Moreno Valley, California, regarding collecting locations derived in coordination with myself upon joint review of rockhound location maps at meetings in her office, and request that access to each of the collecting locations identified therein be maintained or reopened. A copy of a list provided at the end of our last session is attached hereto and incorporated hereby for your reference
1006	Moreover, all current routes should be inventoried and evaluated for conflicts with biological and other rare resources as well as ecological, hydrological, eolian and other physical processes. That the BLM is able to undertake such an approach. was shown in the Ord Mountain Route Designation Environmental Assessment process (BLM 2000) which was a comprehensive process that was abandoned by BLM. BLM should consider replicating that process throughout the West Mojave area as it was originally proposed to do.
1006	In an attempt to understa.nd more about the route proposal, the Center has requested the route inventory as GIS information so that we can accurately assess the impacts to other resources, but to date have not received the requested data. On February 1,2012, I contacted the district wildlife biologist, Larry LaPre inquiring whom I should contact regarding the route data in GIS. On February 2,2012, Dr. LaPre directed me to Peg Margosian, whom our GIS person contacted. Ms. Margosian forwarded on our request to you, Ms. Seehafer, but we never received a response. In order to effectively participate in the public process, we again request the current proposed route information in GIS format.
1006	the California Department ofFish and Game is currently implementing rigorous vegetation mapping in the West Mojave area, in support of the DRECp2. These data need to be incorporated into the environmental analysis and used as a basis for route evaluation.
1006	Regarding connectivity for wildlife', several new data sets are now available and should be included in the analysis. SC Wildlands has produced the "Linkage Network for the California Deserts 4. In addition, the USFWS has produced a map of essential linkages for desert tortoise (Attachment 1), which should also be incorporated and analyzed in the EIS. These areas are critical to keep the west Mojave desert's wildlife connected, and therefore should be analyzed as highly protected areas.
1009	There has never been a complete, and 100% accurate, route survey in the WEMO Plan area. For this reason,

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	so that the public at large can properly establish a more accurate amount of routes which have been lost in and around the WEMO route system, the BLM should release in electronic form, on the Internet, all data and information relative to any governmental mapping effort for this region. For the purpose of this request, "region" is to include not only the WEMO Plan area, but also all those lands in public or military ownership, for a range of one-hundred (100) miles from the exterior boundary of the WEMO Plan area. This information should also include historical USGS Topographic maps at the highest resolution and detail available for the same area.
1009	On all future draft and final maps relative to this action, an indicator should be included to show routes which extend beyond the WEMO Plan area.
1015	The inventory of springs and seeps should also include tinajas, guzzlers and tanks.
1015	BLM should leave the words “existing roads and trails” in the CDCA Plan however it should be clarified as to reflect that this does not just mean 1980. It could also mean whatever roads are in existence on the ground when ever access issues are determined.
1016	The Society believes the BLM should identify all those roads in existence in 1980. First cut should be all the roads within the CDCA and on pre 1980 U.S.G.S. Quads. Then those roads on AAA maps from that time. (These roads were ground truthed at the time and so we know they existed at that time.) This would be a great start on a base map to be used for the process. Should BLM choose not to do this, the public should be given the amendment the BLM proposes to use to change the California Desert Conservation Area Plan so that the public can submit scoping comments on the proposed plan amendment. The Society for the Protection and Care of Wildlife believes that the BLM proposed WEMO amendment to the California Desert Conservation Area Plan must amend the entire plan and not just the WEMO portion.
1016	The WEMO route designation amendment of the California Desert Conservation Area Plan being worked on now, needs to inventory every route, the paved roads, the graded dirt roads, the ungraded dirt routes, the single track routes, the rights of way, all routes in approved plans of operation, ALL ROUTES OF TRAVEL open or closed.
1017	Routes and route segments that are identified for analysis and designation should include: all routes originally within the 2004 designation pool; all routes identified in subsequent BLM surveys; routes identified by the public; and routes considered by previous designation efforts, i.e. Jawbone-Butterbredt ACEC, Rand Mountains Management Area, Ord Mountains.
1017	The court mandated inventory of seeps and springs and their condition should also include tinijas, guzzlers, tanks and wells.
1017	The SPCW is concerned that the original WEMO maps have not been ground truthed to any degree. For example: the WEMO maps for the Slate Range. This map shows three open routes near Manly pass, none of which are actually on the ground even close to where shown. The BLM has posted closed signs on one of the three existing routes yet an open route shown on the map is a virgin canyon with no tracks.
1022	BLM must take into account all previous data and analysis from planning efforts spanning almost three decades in this Proposed Action.
1025	However, all current routes should be inventoried and evaluated for conflicts with biological and other rare resources as well as ecological, hydrological, eolian and other physical processes. The Ord Mountain Route Designation Environmental Assessment process (BLM 2000) was a comprehensive process which should be replicated throughout the West Mojave area as it was originally proposed to do.
1025	BLM need to use the best information to identify the existing route/roads/trails network from 1982, and then compare those data to the current routes/roads/trails data. All routes/roads/trails need to be evaluated for conflicts with resource concerns. If adequate and comparable aerial photos are available, they could be used to document the routes/roads/trails.
1026	Unfortunately, the BLM has not provided GIS layers showing the current authorized route inventory for the eight TMAs or the boundaries of the TMAs. Without this basic information, it is difficult for the public to provide meaningful proposals to help the BLM at this time. Please ensure that when any proposed actions are forthcoming that the relevant GIS data is made available so that the public can assist the BLM as is the clear intent of the National

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	Environmental Policy Act ("NEPA").
1026	For each identified route, provide the length and width. Determine the total area occupied by each route. Quantify the area of each route by soil type and by vegetation type. Document and quantify the number of wash and canyon crossings and adjacent riparian areas for each route.
1026	For each designated route provide an estimate of the number of other unauthorized routes that lead off that route to provide information required to ensure that the proposed system does indeed minimize conflicts between off-road vehicle use and other existing uses.
1027	Many guzzlers and other wildlife maintenance apparatus are located in the study area. Not only should these all be mapped and identified, access to all of these areas is critical and must be included in any new plan.
1027	All roads and tails on maps must be ground – verified. The current mapping contains many errors, in order that these errors do not become part of the finished product, site specific analysis is needed.
1028	It seems that both the BLM and Forest Service are using forest planning and travel management planning as an opportunity to close as many motorized recreational opportunities as fast as possible. We are asking that this project establish a baseline evaluation and address this significant impact.
1028	NOTE: PLEASE PROVIDE DATA AND ANALYSIS SIMILAR TO THE FOLLOWING FOR THE ENVIRONMENTAL ASSESSMENTS FOR 8 TRAVEL MANAGEMENT AREAS WITHIN THE WEST MOJAVE AREA ANALYSIS. THIS INFORMATION WILL SUPPORT ADDITIONAL OHV OPPORTUNITIES. [Insert containing data and analysis regarding travel management in certain U.S. National Forests]
1028	Furthermore, we request that the data in the next two tables be updated to reflect the significant reduction in miles of roads and motorized trails that decisions have produced since this data was assembled. This revised data should be used to guide the decision-making to forest plan and travel plan alternatives that adequately meet the needs of the public by increasing motorized recreational opportunities in the national forest system.
1033	Corrections should be made to the Middle Knob map: o Change State Route "29" label to "14" (south of Mojave). o Show the current SR 58 freeway a1ignment north and east of Mojave.
1037	The GIS/GPS data collected for the WEMO process must be made available to the public to enhance their ability to understand the review and analysis process.
1042	Previously disturbed places for stopping and parking should be located and mapped so people know where they can park without disturbing more vegetation.
1042	Language in the WEMO plan regarding route designation and use must be improved. Previous language used phrases such as routes that were to be "encouraged" leaves one wondering if cross country vehicle travel is okay. Language must be much clearer, stronger and more meaningful.
1042	The BLM has a responsibility to come up with a set of maps that depict a reasonable baseline from which to work.
1046	Please look at the maps that are available to the public yourself: Here are some items that are of concern: a) There is an annoying disclaimer that bounces around the map as you move the mouse. It states that the maps are representational only. When will the BLM come out with some real, accurate maps? How can the public be expected to make sensible comments if the maps are not considered complete or accurate by the BLM? b) Not all the open routes signed on the ground are on the map. How do we comment on the ones that are omitted? c) Many of the open routes don't have a number on the map. What is the status of those roads? d) Some of the numbers do not appear to be on the open route. e) It is not clear on the map what some of the unnumbered lines are: open or closed route, footpath, powerline or if it is a stream. How do we comment on those items? f) Some roads are marked 4wd which are limited/private use with a locked gate. Unless you are on the ground and find the gate you don't know it, and even then, you may wonder why there is a locked gate! If we were not so familiar with the area, we would not know about the purpose of such routes or gates. These routes, which give a right of way to a rancher/miner/guzzler must be on the map and accurately annotated as a "route for permittee only". g) There are very few place names and many of the important features are not included, which makes the maps almost

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	useless. Even well known roads such as Bowen Ranch Road are not named. 3N14 and 4N16 are not named as such, but those are the numbers on most county and area maps as well as GPS. h) There are no grid lines or coordinates for reference, making it very difficult to navigate. i) Open routes in the USFS boundary to the south are not included on the BLM map. The BLM has said that they work with the USFS to ensure connectivity, but the public has no way of visualizing that connectivity. j) The topography is not shown. This makes it difficult to determine accurate comments.
1047	Adequate Adequate maps are those that contain a standard set of features which would include the following (these can be provided in GIS layers): topography and names of features such as mountains, streams etc some way to identify the area such as coordinates or Township etc. blue line streams, springs riparian vegetation and other vegetation types sensitive species Wilderness areas and WSAs ACECs Other areas of special scientific interest soils Currently active mining claims and rights of way disturbed lands including closed mine shafts,quarries, areas used for camping/shooting etc transmission lines and rights of way Railways and rights of way Communication towers and rights of way Other rights of way wind energy testing sites and location of towers or proposed towers Grazing allotments and improvements such as cattle guards, fences gates etc Boundaries with other agencies (such as parks and US forest lands) should also show the open routes in those lands and the non-motorized zones as well as boundary fences etc. other fences Routes should be differentiated between full sized roads, currently street legal only, OHV trails, and single track with the width provided Hiking and Equestrian trails Visitor centers, kiosks etc Ranches and homes as well as private property Places of historic interest
1047	I am sending you a copy of my request that the BLM provide adequate maps so that the public can make informed comments regarding the WEMO route designation process. The BLM has updated maps for many areas regarding the items that would be helpful to me and others in making comments, but the only maps available to us are rudimentary and lack any sort of detail. In fact, with most maps, it would be very difficult to follow the routes on the ground, even with the open route signs posted at intervals. This is because, on the ground, there are a multitude of routes that are designated as closed (but not marked), and there are also miles and miles of new routes created by the public without the BLM designation process (volunteer or illegal routes).
1055	The BLM must publish accurate maps of the entire region and make them available to residents both on-line and in a hard copy for no cost. These maps should be available to the public at public meetings, at the BLM offices and via mail. One factor that contributed to the inaccuracy of the WEMO maps and route designations was the lack of ground-truthing in these areas. The BLM needs to apply Global Information System (GIS) technology to overlay critical habitat, private lands, ACECs, Desert Wildlife Management Areas (DWMA)s, and the Morongo Basin Wildlife Linkage Design[4] (see attached) to compare with proposed routes.
1055	Baseline Information In order to develop a travel management policy with a solid foundation, the BLM must include the latest scientific information and studies on the following: • impact of ORVs on critical habitat, ACECs and habitat for threatened, endangered, rare and BLM sensitive species

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	• the number of accidents involving ORVs and an accounting of citations issued by all relevant law enforcement agencies on a yearly basis since 1980 • the extent of ORV damage to soils, wildlife habitat and plant communities within the WEMO • the capacity of the BLM to provide law enforcement for the WEMO area • the impacts of ORVs on washes, unusual plant assemblages, and riparian resources • the impacts of ORVs on air quality within the WEMO area, especially in areas that are out of compliance with state and federal air quality standards for both PM 10 and PM 2.5 air pollutants, and the health impacts of this fugitive dust • the cost to local governments from ORV law enforcement and related emergency response, and ORV damage to roads, berms and flood control infrastructure • the impacts of ORVs on cultural resources and tribal lands • the potential for the spread of non-native invasive plant species
1057	In the proposed plan amendment, the OHV "Limited Use Areas" should include, at a minimum, those "routes of travel" identified as appropriate for such use in the new route designation process. In other words, the new route designation process will redefine the baseline for determining which routes are part of the WEMO Plan and which ones are not.
1057	BLM must ensure that the routes identified for inclusion in the plan amendment are "ground-truthed" as to location, width, length, and potential impacts on resources and other uses. Further, to the extent BLM can analyze however imperfectly - the effects of the proposed network as compared to those of the network that existed in 1980, this should be done.
1087	The inventory of springs and seeps should also include tinajas, guzzlers and tanks.
1087	In 1980, the year mentioned by the judge, there were 30,000 miles of roads in the California Desert. The original maps that were drawn up, should be made available to the public as their input had been requested and was considered part of the basis for the decisions. Without these original maps the road designation process will be considered flawed by NEPA standards.
1095	BLM should inventory all "previously disturbed" sites.
1098	I have looked at your maps and I am unable to understand them. The BLM must do better. If I cant understand where OHV users can go, how can they?
1100	The court mandated inventory of seeps and springs and their condition should also include tinijas, guzzlers, tanks and wells.
1100	The RACC is concerned that the original WEMO maps have not been ground truthed to any degree. For example: the WEMO maps for the Slate Range. This map shows three open routes near Manly pass, none of which are actually on the ground even close to where shown. The BLM has posted closed signs on one of the three existing routes yet an open route shown on the map is a virgin canyon with no tracks.
1100	Routes that are not listed as part of the designated route system, yet exist on the ground need to have a site GPS completed and be assigned a number and be made part of the designation system.
1101	In order to develop a travel management policy with a solid foundation, the BLM must include the latest scientific literature on the following: • impact of DRVs on critical habitat. ACECs and habitat for threatened species and species of concern. • the number ofaccidents involving DRVs and an accounting ofcitations issued by all relevant law enforcement agencies on a yearly basis since 1980 • the extent of damage by DRVs to soils, wildlife habitat and plant communities within the WEMD • the capacity ofthe BLM to provide law enforcement for the WEMD area • the impacts of DRVs on washes and other ephemeral waterways • the impacts ofDRVs on air quality within theWEMD area, especially in areas that are out of compliance with state and federal air quality standards for both PM 10 and PM 2.5 air pollutants, and the health impacts of this fugitive dust • the cost to local governments from DRV law enforcement and related emergency response, and DRV damage to roads, berms and flood control infrastructure • the impacts of DRVs on cultural resources and tribal lands
1101	We are including a map of the Subregion with the above BLM areas circled in red. We are also including photos ofthe

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	degraded BLM Parcels. Poor management by BLM personnel has destroyed some ofthe mostlovely land in Kern County.
1106	The BLM should develop a means to provide maps to the public that illustrate all the roads that currently exist on the ground as well as those in existence on the 1980 Desert Plan maps.
1114	Map Name and Number - Afton Map 1 Route# - Grid Location - Point of Interest - Comment Type - No details on the map. Where are the road names? Where is the campground? Add details to make the map more user friendly
1115	Maps totally inadequate for Afton County. Does not show rail road, major roads, campground etc. Give maps so we can verify validity.
1116	No features on detail map, should be USGS topo map.
1116	On the eastern side of Subregion needles south the map does not exist. Please send me a copy as soon as possible.
1120	Map Name and Number - Sierra Map 2 Route# - SE 993 Grid Location - T22S R37E Sec. 15, 16 Point of Interest - Comment Type - Site Specific Map error trails, SE993 not SE977
1120	Map Name and Number - Sierra Map 1 Route# - SE 9 Grid Location - T22S R39E Sec. 31 Point of Interest - Comment Type - Site Specific Intersection of SE7 and SE9. Map shows SE9 continuing toward the SE. On the ground the road heading NE is marked SE9.
1120	Map Name and Number - Sierra Maps 2 and 3 Route# - Grid Location - T24R38E Sec. 16 Point of Interest - Comment Type - Site Specific The historic Bonanza trail is shown as an undesignated route. See back page for additional info.
1120	Map 2 - Lower right-hand corner. Hwy 178 - Walker Press Rd. is nowhere near this map, correct it.
1146	I think we should revisit all the trails in the plan. If some trails were left open due to insufficient guidelines; conversely some were closed for the same reason. The present routes are said to be from the 85/87 route survey, which many contend was never ground proofed or completed. I think we should revert back to the original desert plan and consider all routes equally. I personally know of many routes in Searles Valley, Panamint Valley and the Darwin area that have been there for over a hundred years, yet are not on the present WEMO designated route plan.
1146	Assess all roads originally considered in the Desert Plan as amended in the 1980/82 time period. All network roads assessed after were never officially ground proofed or went through the full NEPA process and therefore should not be now closed.
1156	Need better maps.
1163	Highway 395 has the El Paso on the West and Ridgecrest on the East. There are single track routes that come down a hill, cross 395 and go over railroad tracks. This can clearly be seen from Hwy 395 before you get to the Ridgecrest billboard. When you look at the BLM maps, these single tracks do not show up, but we know they are there. Perhaps the Survey done by the BLM Catasdral group should be brought up to the Sub group meeting so that it can be identified on the maps, as well as other routes that cannot have GPS done without violating the "Closed Unless Signed Open" designation which is currently in place.
1249	Value of accurate, available and up-to-date route maps. Local planning efforts

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	can benefit greatly when accurate route maps are established and made readily available to planning groups. Setting conservation priorities for land acquisition andlor protection can be done in a more predictable manner when all of the stakeholders involved know which BLM routes are valid and established, and their exact loctations. Hard copy and digital files of final route maps should be made available to the interested public.
1249	Base route designations in valid conservation science, including the use of existing wildlife linkage design studies to inform route designation. For example, SC Wildlands has performed two linkage design studies (www.scwildlands.org/reports) that map least cost corridors for a set of focal species defined by wildlife experts for the Morongo Basin. These are "A Linkage Design for the San Bernardino-Little San Bernardino Connection" and "A Linkage Design for the Joshua Tree-Twentynine Palms Connection." Other scientifically based studies by the USGS, U5FWS, CA DFG or other agencies that can inform route designation should be included in the development of the route maps.
1256	I am enclosing 2 attachments pertaining to signage and mitigation. The supplemental maps issued in Aug. omit many open routes and notably the routes the Lost Coyotes M/C has used on 7 sanctioned dual sport events since 2001. This shows me how inaccurate the maps are. The subregions that have omitted our sanctioned dual sport routes are - Ridgecrest,El Paso's,- Red Mtn.,- Fremont,- Black Mtn.,- Kramer. I can supply sanction numbers and the routes will be on file in Ridgecrest and Barstow F.O. ·s.
1256	New maps should show single track trails in a different color than 2 track.
1256	Map is poor quality, Cooper City Route numbers change.
1284	The BLM needs to apply Global Information System (GIS) technology to overlay critical habitat, private lands, ACECs, Desert Wildlife Management Areas (DWMA)s, and the Morongo Basin Wildlife Linkage Design4 (see attached) to compare with proposed routes.
1284	In order to develop a travel management policy with a solid foundation, the BLM must include the latest scientific information and studies on the following: • impact of ORVs on critical habitat, ACECs and habitat for threatened, endangered, rare and BLM sensitive species • the number of accidents involving ORVs and an accounting of citations issued by all relevant law enforcement agencies on a yearly basis since 1980 • the extent of ORV damage to soils, wildlife habitat and plant communities within theWEMO • the capacity of the BLM to provide law enforcement for the WEMO area • the impacts of ORVs on washes, unusual plant assemblages, and riparian resources • the impacts of ORVs on air quality within the WEMO area, especially in areas that are out of compliance with state and federal air quality standards for both PM 10 and PM 2.5 air pollutants, and the health impacts of this fugitive dust • the cost to local governments from ORV law enforcement and related emergency response, and ORV damage to roads, berms and flood control infrastructure • the impacts ofORVs on cultural resources and tribal lands • the potential for the spread of non-native invasive plant species
1288	Need to add three riparian areas to the database that may have OHV impacts: Coxey Creek Riparian Zone (S. of Castro's private land), Lion Canyon Riparian Zone (near Luna Mtn), and Warm Springs.
1290	I'm working with a set of II x 17 maps that were handouts at the Jan 26, 2011 scoping meeting discussing Searles and Darwin WEMO routes. They are labeled North Searles, South Searles, Sierra Detail Maps 1, 2 and 3, and, Darwin. These maps are essentially unusable, and The BLM cannot expect the quality of comments it needs from them. Please distribute accurate, user-friendly maps in time for the public to use them to make the comments the BLM has requested. Problems with these maps: Grid: The maps have no Lat/Long or UTM grid lines, making precise field or desk

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	inspection impossible. Border tick marks are also missing, so I can't draw my own grid lines on the maps. Meaningful and accurate comments are near impossible unless a commenter is intimately familiar with the ground. The maps do have PLSStownship, range and sections, and theoretically a moderately accurate position could be determined by comparing the maps with those USGS maps that also have PLSS. But that is asking more from your prospective commenters than you could expect in order to get good comments. Place Names: Very few place names are included, making it even more difficult to judge route locations. Contour Lines: Omission of contour lines also makes field inspection, or even desk inspection, difficult. Routes in Wilderness: Both open and closed routes are shown in designated wilderness. This is confusing. Is BLM suggesting open and closed routes in Wilderness could be designated for motorized use? Illegible Font: The tiny font for all except the legend requires either good close up vision or a magnifying glass. The maps are undated: There is no way, now or in the future, to tell how fresh they are. Please put publication dates on any new versions. Computer Printed: The handout maps can be downloaded. But when printed they are even less legible than the meeting handouts. This makes it very difficult to use home computers to make comments. It will severely restrict the quantity and quality of comments. Downloaded Pop-up: Briefly resting the cursor on a downloaded map shows a text pop-up with very confusing language, something about not being 508 compliant with no explanation of'508', and essentially saying the maps are no good, can't be relied on, and that the BLM takes no responsibility for them. These maps that are intended to elicit well considered comments, are an obstacle. Personally, I am familiar with routes on the North Searles map. Only with a lot of work researching and comparing the map lines with previous BLM maps and with topo maps would I be able to provide meaningful comment. The following suggestions would make the maps even more useful to commenters. Colors: BLM land is a light yellow, private is white. Complex boundaries are very hard to see. Adjacent Land: Include wilderness, open routes, and other land management status in adjacent FS and NPS managed lands. This is necessary to detennine connectivity with the adjacent management areas. The borders are often not obvious on the ground, and routes crossing the borders should be consistent. This is very difficult to determine without knowing the land and route states of the adjacent areas. The BLM, exercising good faith, must consider the route maps as a tool for use by the public that has been asked to participate in the process. As it stands, the maps are a very poor tool. The BLM cannot expect the quality comments it wants and needs in return.
Analysis and Impacts	
1001	In addition, it is important that the cumulative effects of past government actions, and proposed or anticipated government action, including but not limited to proposed or anticipated alternative energy projects and military base expansions, whatever they may be, have deprived or will deprive rockhounds of former collecting locations.
1001	Replacement of access lost for recreational and all of the varied public use purposes, including Mechanized and Motorized Dependant Recreational Activities, must be considered on a overall view basis of the entire Plan Area with regard to the effects resulting from the past, present and potential future renewable energy facilities and base closures as well as any and all types of conservation efforts applied to the Plan Area that have or will affect the public's use.
1001	To consider only such loses on a project-specific basis denies all parties involved the opportunity to evaluate the cumulative losses for the Plan Area as is required by NEPA and our expectations. The application of NEPA with respect to analyzing cumulative effects is clear, it can and should apply to entire regions such as the WEMO Plan Area.
1001	The BLM must additionally consider other upcoming changes that will potentially affect access and recreational opportunities such as the proposed Marine Corps 29 Palms Air Ground Combat Center expansion which also has the potential to remove a large amount of land from public use.
1001	The BLM must fully examine recreation, including rockhounding, access, and the relationship between them. A dispersed motorized off-highway route network exists throughout the planning area and is utilized to pursue and support various activities including rockhounding. For this reason, data and specific information about the extensive

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	recreational uses within the West Mojave planning area is essential to developing the route plan. The potential impact of the plan on recreation broadly, and rockhounding specifically, must be a consideration when developing the West Mojave route plan.
1002	Equally significant, BLM's cumulative effects analysis in the 2003-05 route designations did not adequately address impacts associated with previous route proliferation; the effects of not fully implementing vehicle use management actions in the past; or the likelihood that planned BLM vehicle management action might not occur in a timely fashion. Nor did this analysis ensure that environmental factors were weighted equally when compared to other factors in BLM's decision-making process.
1002	An estimate of the acreage of land that will be subjected to low, moderate and high vehicle use disturbance in relation to differing erosion rates should be analyzed in any route network alternative analyzed in associated NEPA documents. Similarly, the acreage of lands that will be subjected to visual resource impact due to their location on certain topography, and/or the likelihood of erosion impacts over time, should be evaluated.
1002	It is critical that special status plant and animal species are proactively addressed in the route designation process using a biological screening process (BLM 2000). This analysis should be conducted by qualified biological personnel having knowledge of the respective species, the potential for vehicle impacts to individuals of the respective species/suitable habitat, and applying site-specific analysis where warranted.
1002	Per the Fort Irwin Military Land Withdrawal Act (U.S. Congress 2001), route designation throughout the WEMO planning area is also to be considered in light of all resource impacts connected with the approved expansion of the U.S. Army's National Training Center at Fort Irwin. Therefore, all planned WEMO route designation measures within tortoise critical habitat should be prioritized accordingly and undertaken in a timely manner.
1005	Our opinion runs counter to that assumption, and we encourage the BLM to use on site analysis using the best available science to determine probable impacts.
1005	As OHV use is also an important economic contributor to small, local communities, any change in direction from current use must be analyzed for economic impacts to those communities.
1005	Because Johnson Valley lies within the WEMO Planning Area, the proposed plan amendment must account for the impacts associated with the proposed USMC base expansion. As a result, the plan amendment must operate on two parallel but different assumptions. First, it should assume that the proposed base expansion into Johnson Valley will not be approved or implemented. Routes in existence today should be considered for inclusion in the final route network, regardless of whether these routes are located within the proposed USMC base expansion area. Second, the plan amendment should assume that the base expansion into Johnson Valley will take place. Therefore, the proposed route network must be designed to maximize access to those places within Johnson Valley left untouched by the base expansion. This would involve, among other things, possible development of new routes to function as access corridors between open areas and those venues within Johnson Valley which, while not part of the expanded Marine Base, will nevertheless be difficult to reach via the existing network of trails and staging zones.
1006	As to air quality, it is completely irrational for BLM to attempt to segregate the analysis of the impact of a route designation from the cumulative air quality analysis for all activities in the WEMO Plan, including open areas.
1006	The USGS has also produced a desert tortoise habitat mode13, and that modeling effort should be included in the analysis in support of desperately needed recovery opportunities for the declining desert tortoise.
1006	In addition, BLM must take into account new information regarding climate change and other impacts to resources in the W~st Mojave planning area in its new NEPA review.
1006	The solar PEIS is slated to be fmalized shortly. Because of the potentially significant impacts to ecological processes and biological resources from the proposed preferred alternative in the supplemental PEIS, additional route restrictions in the west Mojave may be needed in order to assure persistence of these ecological processes and biological resources. The BLM'sNEP A analysis in the EIS must clearly identify how it will address the increase in industrial scale development on lands in the West Mojave that would be authorized under the final PEIS designations.
1006	Additionally the project area is also located within the boundaries of the DRECP, which is also slated to be final by March 2013. In order to accommodate renewable energy development in the west Mojave desert and elsewhere in the CDCA, additional conservation

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	areas will need to be incorporated on public lands in order the meet the requirements of section 10 of the ESA (the Habitat Conservation Plan) as well as California's Natural Communities Conservation Plan standards. The BLM's NEP A analysis for the West Mojave plan amendment in an EIS will need to clarify how this process will incorporate the conservation goals of the DRECP effort into this planning process as well.
1007	However, with solar project development and a proposal to expand 29 Palms Marine Base, areas currently legal for OHV would be again ousted and removed from legal areas. Cumulatively the impact on the recreational population that is currently using the legal areas may be adversely impacted if the West Mojave Plan is further expanded to conserve habitat. A sensible balance needs to be achieved that allows regulated recreation that also protects sensitive environmental areas.
1009	The BLM should conduct a scientific study to determine current and foreseeable trends in public land use and how those trends affect the public at large who rely on motorized and mechanical means of transportation to visit their public lands. This study should include an analysis of all uses of Southern California desert lands and include the effects of renewable energy plans. This study should also include analysis of the following subjects: a) Will the preferred alternative achieve a balance between population and resource use which will permit high standards of living and a wide sharing of life's amenities? b) Will "individual choice" be sacrificed to that which dominant environmental groups in our nation are establishing as the norm for choices in contact with, and recreation on, our public lands?
1015	When evaluating a road certain things must be considered. Some of these are: Is it a through road? Is it a road which can be connected to another to relieve pressure on sensitive species? Is it a road which dead ends at a space which has room for parking and is a trail head for hiking or gem and mineral collecting or some other type of activity? How long has the road been in existence? Does the road have a history? Is the road in a sensitive area? Has there been significant impact to the sensitive whatever? Is the road a dead end which is or could be used to access an area for family camping, picnicking, painting, photography or quiet contemplation? Is the road needed to evacuate people in case of fire or flood? Is the road a dead end at a special geologic or some other feature? Is the road necessary to provide access to guzzlers, tanks, springs, seeps or tinajas? Is the road a cherry stem? And so on.
1017	When evaluating a road certain things must be considered. Some of these are: Is it a through road? Is it a road which can be connected to another to relieve pressure on sensitive species? Is it a loop trail such as: Hidden Valley to Mesquite Spring and Wilhelm Wash to Baxter Wash in Afton Canyon ACEC. Is it a road which dead ends at a space which has room for parking and is a trail head for hiking or gem and mineral collecting or some other type of activity? How long has the road been in existence? Does the road have a history? Is the road in a sensitive area? Has there been significant impact to the sensitive whatever or so little impact as to be insignificant? Is the road a dead end which is or could be used to access an area for family camping, picnicking, painting, photography or quiet contemplation? Is the road needed to evacuate people in case of fire or flood? Is the road a dead end at a special geologic or some other feature? Is the road necessary to provide access to guzzlers, tanks wells, springs, seeps or tinajas? Is the road a cherry stem? And so on.
1017	The BLM EIS must also consider other forthcoming changes which will or have the potential to affect access. For example, the planned expansion of the Marine Corps Air Ground Combat Center Twenty Nine Palms, California will certainly remove a large amount of land from public use with all sorts of “take” of various species.
1017	There must be adequate discussion/consideration in the BLM EIS, of lost recreation opportunities and how they might be mitigated. As whatever vehicle one uses, becomes an OHV when it hits that dirt road, (usually historic and usually user maintained.) replacement of access lost for OHV use, should be considered as part of the analysis of project specific

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	impacts.
1022	The Proposed Action must adequately evaluate and mitigate the cumulative losses of land for recreational opportunities, including but not limited to cumulative closures or limitations on desert lands managed by BLM and on forest lands managed by the U.S. Forest Service. Actions that must be evaluated include, but are not limited to, proposed military base expansion, proposed renewable energy development sites, existing and proposed wilderness areas, existing and proposed critical habitat designations, and other existing and proposed land use designations that encompass restrictions to access, including but not limited to National Landscape Conservation System, National Conservation Areas, National Park, and Areas of Critical Environmental Concern.
1022	In reviewing the Proposed Action, CA4WDC finds it deficient in its acknowledgement of the importance of recreation to the West Mojave (WEMO) region. Specifically, the proposed Proposed Action fails to acknowledge that various recreational activities exist in the proposed project region.
1022	CA4WDC believes that the loss of access to the West Mojave (WEMO) region for recreation opportunity is a direct loss. There are also indirect impacts that would result should this Proposed Action be approved and implemented causing displacement of recreational activities. Those cost include, but are not limited to: (1) the increased enforcement required at other sites when displaced recreational users seek out other areas that may be poorly identified as wildlife preserves or other resource-rich areas; (2) the loss of biological resources or habitat at other sites that displaced recreational users may utilize ; (3) the loss of nature education, (4) the loss of outdoor recreation opportunities, (5) the loss of outdoor access and experiences for children in the community; (6) the loss of familial traditions, custom, and culture of recreational and nature-oriented activities in the region; and (7) the loss of the region's history and traditions, specifically with respect to mining and recreational activities.
1022	The aspects of social, economic, and public health and safety are very important and must be given adequate discussion and analysis. The Proposed Action must contain complete disclosure and analysis of the cumulative loss of recreational access, impacts to public health and safety, and economic impacts of the project on the local and regional communities.
1022	CA4WDC believes that cumulative effects of other planning efforts within and adjacent to the proposed planning area be determined and analyzed as part of determining motorized vehicle use issues and concerns within each sub-regional area of the WEMO plan area. The cumulative effects include but are not limited to planning efforts such as the proposed expansion of Twentynine Palms Marine Corps Base and the Desert Renewable Energy Conservation Plan.
1023	In reviewing the proposed environmental assessment (EA), it is deficient in its acknowledgement of the importance of recreation to the West Mojave (WEMO) region. Specifically, the proposed Action fails to acknowledge that various recreational activities exist in the proposed project region.
1025	In addition, BLM must consider other ongoing planning efforts that will amend the existing WEMO plan amendment to the CDCA such as the Solar PEIS, and the DRECP. For example, soil structure and air quality are both impacted by open areas, routes, grazing, and industrial scale renewable energy development
1025	Impacts to soils and air quality resources from route designation and other activities must be considered together in order to adequately evaluate the overarching impacts to soils and air quality and ensure that the resulting planning adequately protects these resources and others.
1025	Additionally, all routes (both legal and illegal user created routes) should be included in the analysis. Every route segment should be evaluated for environmental impacts to the surrounding ecosystem and if these impacts are determined to negatively affect species and habitats, soils, water resources, water and air quality, they should be closed. If existing routes cause a significant environmental impact, they should be considered for redesign or closure to minimize the environmental impacts.
1025	The route designation process should be a fully transparent public process, driven by science. Issues to be evaluated in route designation process for each route segment and disclosed in the EIS should include but are not limited to: · Analysis of impacts to BLM sensitive, rare, threatened and endangered species and their habitats including but not limited to desert tortoise, Mohave ground squirrel, Lane

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	Mountain milk-vetch, Mojave fringe-toed lizards; · Analysis of impacts to plant communities and Unusual Plant Assemblages (UPAs); · Analysis of impacts to riparian, wetland, springs, seeps and other water dependent resources; · Analysis of impacts to essential ecological processes (for example dunes systems and sand transport corridors); · Analysis of impacts to essential wildlife connectivity corridors; · Analysis of the impact of the release of vehicular pollutants, including oil and gas, ozone precursors, nitrogen oxides, particulate matter, carbon dioxide, carbon monoxide, and heavy metals (such as lead, zinc and cadmium), which may have serious additive and cumulative effects on the surround environment; · Analysis of noise pollution from vehicles that impact wildlife populations; · Analysis of routes as dispersal corridors for invasive plant species; · Analysis of ORV as dispersal mechanisms for invasive plant species; Analysis of direct impacts from roads on wildlife including habitat loss, mortality due to collision, habitat fragmentation and edge-to-area ratio of habitat; · Analysis of impacts to the integrity of adjacent soil crusts and desert pavements; · Analysis of impacts from routes in destabilized soils that result in additional PM10 emissions. · Analysis based on the types of route (ORV trails [motorcycle, quad, jeep etc.], unimproved local road [1-lane dirt], improved local road [1 or 2 lane dirt or gravel] and collector road [2 lane dirt or gravel]; · Analysis of the ecological effects of vehicular routes at three spatial scales: (1) direct effects within route corridors (2) indirect effects distributed along gradients radiating outward from route corridors; and (3) dispersed landscape effects resulting from the cumulative effects of multiple routes across landscapes; · Analysis of the ecological effects on soils, including changes in hydrological processes that promote soil erosion such as rilling and gullying, and increased impermeability of soils due to compaction; · Analysis of increased NOx emission and nitrogen deposition effects on plants (native and non-native). · Analysis of fire risk from the routes based on the incompatibility of desert landscapes and fire; · Analysis of cumulative impacts from grazing and routes on species, soils, water resources, air quality and others should be undertaken both at the WEMO regional scale and for sub-regions.
1025	The California Desert Conservation Area lands are easily damaged and slow to heal. Therefore it is prudent that the BLM carefully evaluate the designation of routes on these fragile lands and put in place a system that minimizes damage to them.
1026	The BLM must consider the cumulative effects of the alternative route proposals it develops with other activities that it authorizes. Since 2006, when the WMP ROD was originally signed, the two most extensive area-wide activities that the BLM has authorized are livestock grazing and the use of public lands it manages for power plant projects including solar and wind energy power plant projects.
1026	Quantify the amounts of route proposed within the boundaries of the proposed National Monument and analyze the impacts.
1026	Because unauthorized vehicle activity is frequently found on both sides of fences, quantify the number of fences crossed by each route. For each designated route provide an estimate of the number of other unauthorized routes that lead off that route to provide information required to ensure that the proposed system does indeed minimize conflicts between off-road vehicle use and other existing uses.
1026	In the cumulative effects analysis, consider the cumulative impacts of each proposed action with all planned, proposed and reasonably foreseeable Solar and Wind energy projects and energy transmission projects on all listed and sensitive species, soil types and Unusual Plant Assemblages.
1026	Because of the extent of the current route network, and the overwhelming direct, indirect, and cumulative effects of motorized vehicle activity and motorized vehicle access on sensitive resources, the action will have significant cumulative effects with other land use activities authorized by the BLM including livestock grazing, mining, and energy development.1
1026	It is unclear what the BLM intends by requesting “Identification of those portions of the

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	WEMO plan that should be revised to reflect current management policy regarding motorized vehicle access". Because of the overwhelming direct, indirect, and cumulative effects of motorized vehicle activity and motorized vehicle access, the BLM must revise all portions of the WEMO plan relating to authorized uses and land use designations that have significant cumulative effects including livestock grazing, mining, and energy development if it is to comply with NEPA.
1026	In order to assure that proposed route networks are compatible with recovery, the BLM should consult with the USFWS and utilize the Desert Tortoise Recovery Office's (DTRO) Spatial Decision Support System to model each alternatives proposed route's net impacts to desert tortoise.
1028	Adequate recreational opportunity for all visitors is the supreme issue that must be addressed by this action.
1028	We request that the BLM provide an adequate and fair evaluation of: 1. The needs of motorized recreationists and the cumulative impacts of motorized closures, 2. All existing routes including those meeting National OHV Rule guidelines and currently closed routes, 3. The current imbalance of non-motorized to motorized trails, and 4. At least one pro-recreation alternative in the analysis. 5. Under the existing condition, too much of the West Mojave area is set-aside for segregated exclusive non-motorized use for 1% of the visitors to the area. We do not agree with all of the effort that the agency is going through to segregate users. Multiple-use lands are public places. Segregation in public places has not been acceptable since the Civil Rights Act of 1964 (http://www.ourdocuments.gov/doc.php?flash=true&doc=97&page=transcript). In order to reasonably meet the requirements of integration a reasonable management goal for 99% of the forest would be for shared multiple-use that would produce a forest-wide 50/50 sharing and equal opportunity of non-motorized/motorized trail opportunities.
1028	The Environmental Assessments for 8 Travel Management Areas within the West Mojave Area must include adequate evaluation of cumulative effects so that motorized recreation will not be removed from our public lands. An adequate evaluation of cumulative effects would include all past, current, and reasonably foreseeable actions that have or will produce motorized closures in the State. The environmental analysis must adequately address the human environmental including issues, needs, alternatives, and impacts on the public associated with the reduction or lack of adequate motorized recreation. An adequate analysis would include evaluation of significant social, cultural, historical use, current use, future needs, economic impact, and quality of the human environment issues from the perspective of motorized recreationists.
1028	An adequate site-specific analysis should include monitoring and quantification of existing motorized use versus non-motorized use, types of motorized use and visitors, and effects of motorized closures on the quality of the human environment.
1028	The current emphasis on climate change is being given far too much weight. This focus is not balanced with objective science and the needs of the public. The existence of climate change and any positive or negative impacts are simply not known at this time.
1028	The BLN must give a hard look at the impact of motorized closures on the human environment. Per CEQ guidance, NEPA documents are to be driven by significant issues. Motorized closures and the lack of adequate motorized opportunities have a significant impact on motorized recreationists.
1028	the evaluation must include a meaningful evaluation of the cumulative effects of all current and reasonably foreseeable motorized closures on motorized recreationists including decisions and proposals in all surrounding areas and reasonably foreseeable actions as listed in the National OHV Policy.
1028	The site specific analysis of each road or trail to be closed must address or identify where the public would go to replace the motorized resource proposed for closure. In other words, the analysis must adequately evaluate the site specific value of a road or trail proposed for closure to motorized recreationists. It must also quantify the significant negative cumulative impact experienced when motorized recreationists could not find a trail or road with a similar experience in the area. The quality of our experience has been significantly reduced. It must also quantify the significant cumulative impact that the closure of a system of road and trails would have collectively when enough routes are closed to eliminate a good motorized day outing. An incomplete analysis is not acceptable under NEPA requirements.

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1028	Site-specific analysis should be provided for every road and trail so that the benefits of keeping each motorized travelway is adequately addressed and accounted for in the decision. Site-specific questions will need to be discussed during the process. We request that the mapping be sufficient to allow site-specific analysis.
1034	Second, route designation decisions must reflect the potential cumulative impacts to desert tortoises from grazing, the siting of renewable energy projects, and impacts from motorized vehicles.
1037	The cumulative effects of other planning efforts within and adjacent to the proposed planning area be determined and analyzed as part of determining motorized vehicle use issues and concerns.
1041	Speaking as an equestrian, there are more than esthetic, ie noise/dust issues concerning shared trails with motorized or even mountain cyclists~~horses are prone to "spook" when wheeled vehicles suddenly loom in front of them, with or without noisy motors.
1042	the BLM must take into consideration all of the factors that affect the Juniper Sub Region. These factors may be similar to those that affect other regions, but they may represent a very different set of “combined” or “cumulative” issues.
1046	1. Routes should be placed so as not to harass wildlife and avoid disturbing their habitat. Therefore, all the springs and seeps and blue line streams must be included on the maps and in the legend. 2. Mines, especially active claims must be included on the maps. Mine shafts should be included. 3. Wind energy projects must be included on the maps. It is our understanding that about 8 wind testing towers have been approved for the region. Where will they be located? 4. The Round Mountain Cattle Allotment boundaries must be included on the map 5. The Juniper Flats ACEC must be on the map. It has a separate management plan with identified routes. 6. There is an aviary in the area. Where is it? 7. What other rights of way are approved? Powerline for SCE? 8. Where are the kiosks located? 9. Where are the guzzlers? People use the area to hunt upland game birds. 10. Where are the residences and ranches that are surrounded by BLM lands and routes or adjacent to those features?
1046	According to the original 1980 Desert Plan, SOIL, WATER, and AIR are the three most essential resource components of the California Desert Conservation Area. Impacts from motorized travel on roads and trails on the SOILS, WATER and AIR in the desert were to be monitored and evaluated. The results of those studies must be carefully evaluated in this Travel Management Plan/NEPA process including discussions on the particular impacts on soils of the proposed Plan. The scope and extent of those impacts must be revealed to the public.
1046	BLM has the responsibility of evaluating the cumulative impacts of the proposed plan.
1057	Proposed Route Network Should Anticipate Possible Expansion of USMC Base Into Johnson Valley
1057	the plan amendment must operate on two parallel but different assumptions. First, it should assume that the proposed base expansion into Johnson Valley will not be approved or implemented. Routes in existence today should be considered for inclusion in the final route network, regardless of whether these routes are located within the proposed USMC base expansion area. Second, the plan amendment should assume that the base expansion into Johnson Valley will take place. Therefore, the proposed route network must be designed to maximize access to those places within Johnson Valley left untouched by the base expansion.
1060	Recreation - the potential impacts to recreation should be evaluated. Motorized access is essential to most recreational activities within the proposed area. In our County, these impacts should be considered in light of past and continuing efforts to reduce motorized access and the associated recreational opportunities available to recreationalists. Recreationalists derive social value from recreational uses on public lands. Generations of people have enjoyed the recreation activities within the proposed area, any further limiting ofthose opportunities should be deeply considered. Recreational access is fundamentally important to the interaction ofpeople with their environment. Consideration should be given to the social value impact the proposed plan will have on the recreational users.
1060	Socioeconomics - the potential economic impacts in Inyo County should be considered. Economic development is limited in Inyo County due to the public land ownership panern. While the County is continuously striving to widen the economic base and decrease our dependence on tourism, we are still dependent on the tourism industry for economic success. Recreational tourism brings non-local spending to our community, in the form of recreational spending at OUf local firms that cater to the recreationalists. Recreational spending induces additional economic activity in our area. Recreational visitor spending and the additional economic activity should be considered, especially in our economy that is so dependent on the tourism industry.
1060	Resources - the potential impacts to resource access should be considered. Protection of both current and future of

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	mineral resources extraction is important to the County's economy_ Further limiting access to mineral resources should be avoided. Maintenance of wildlife enhancement features, such as guzzlers, is vital to the survival of several species in the arid climate. Access to such wildlife enhancements should remain open to motorized travel for future maintenance. Consideration should be give to accessing wildlife enhancement features for maintenance.
1060	Land Use and Planning - the Environmental Document and Proposed Plan Amendment should address land use and planning issues between the BLM and the County's planning policies and land use procedures.' Significant consideration should be given to the County's planning policies and land use procedures.
1076	The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases ofthe project and all air pollutant sources related to the project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, butare not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.
1076	In addition to analyzing regional air quality impacts the SCAQMD recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LST's can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document.
1076	In the event that the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the lead agency perform a mobile source health risk assessment.
1086	At some point, you are going to have to realize the Billions of dollars of economic impact that you have on our economy by instituting all these restrictions. People spend Billions (that's Billions, with a "B") on motorhomes, trailers, helmets, gloves, boots. motorcycles, quads, gas cans, water cans, goggles, chest protectors, and so much more EVERY YEAR. If you continually remove our riding areas and leave us no place to ride, you will also lose the tax income from all of these purchases.
1087	When evaluating a road certain things must be considered. Some of these are: Is it a through road? Is it a road, which can be connected to another to relieve pressure on sensitive species? Is it a road which dead ends at a space, which has room for parking and is it a trailhead for some other type of activity? How long has the road been in existence? Does the road have a history? Is the road in a sensitive area and has it had any impact to the sensitive issue? Is the road a dead end, which is or could be used to access an area for family camping, picnicking, painting, photography or quiet contemplation? Is the road needed to evacuate people in case of fire or flood? Is the road a dead end at a special geologic or some other feature? Is the road necessary to provide access to guzzlers, tanks, springs, seeps or tinajas? Is the road a legal cherry stem? And so on.
1089	there should be a competition cooridoor studied between Johnson Valley and Stoddard open OHV areas These will be necessary if we lose Johnson Valley to the military takeover
1100	The footprint created by future projects in the CDCA will further fragment the existing road and trail system by severing existing routes of travel thus excluding the public from the areas within project boundaries and the lands near by. The EIS must look at and the final document must amend the Vehicle Access Element to provide that each future project shall provide environmental analysis for however many work-arounds as are necessary to reconnect the severed access.
1100	When evaluating a road certain things must be considered. Some of these are: Is it a through road? Is it a road which can be connected to another to relieve pressure on sensitive species? Is it a loop trail such as: Hidden Valley to Mesquite Spring and Wilhelm Wash to Baxter Wash in Afton Canyon ACEC. Is it a road which dead ends at a space which has room for parking and is a trail head for hiking or gem and mineral collecting or some other type of activity? How long has the road been in existence? Does the road have a history? Is the road in a sensitive area? Has there been significant impact to the sensitive whatever or so little impact as to be

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	insignificant? Is the road a dead end which is or could be used to access an area for family camping, picnicking, painting, photography or quiet contemplation? Is the road needed to evacuate people in case of fire or flood? Is the road a dead end at a special geologic or some other feature? Is the road necessary to provide access to guzzlers, tanks wells, springs, seeps or tinajas? Is the road a cherry stem? And so on.
1100	The RACC expects to see the Raven at least mentioned as a predator taking significant young and eggs of everything in the desert and when they can larger critters. We expect to see a control program as part of the process. It is wrong to ask stakeholders to cut back their access and activities so the Raven can continue to prey uncontrolled upon desert critters.
1100	The BLM EIS must also consider other forthcoming changes which will or have the potential to affect access. For example, the planned expansion of the Marine Corps Air Ground Combat Center Twenty Nine Palms, California will certainly remove a large amount of land from public use with all sorts of “take” of various species.
1134	There is no clear understanding that adding more Real Estate will bring back the tortoise. There has not been a scientific study to say what constitutes recovery? Where, when and how? Again, expand more closed areas is the only solution to all I can see in the documents presented
1190	Trail closures have had a negative financial impact that can no longer be ignored
1249	Consider adjacent land uses when designating routes, and anticipate possible land use conflicts. Current or projected land uses of adjacent parcels, including zoning, should be considered when establishing routes, to avoid creating conflicts due to incompatible uses or impacts on resources of concern. Access to route areas should also be considered in such a manner to avoid potential conflicts with local land uses or natural resources in adjacent private or public lands, including BLM lands.
1287	When evaluating a route certain things must be considered. Some of these include, but are not limited to, the following: o Is it a through route? o Is it a route which can be connected to another to prevent loss of access to rockhounding destinations? o Is it a route which dead ends at a space which has room for parking and is a trail head for activities such as rockhounding (i.e. a "cherry stem" or a "spur road")? o How long has the route been in existence? Does the route have a history? o Is the route in a sensitive area? Has there been significant impact to the sensitive species or habitat, or so little impact as to be insignificant? o Is the route a dead end which is or could be used to access an area for rockhounding, camping or other activities? o Is the route needed to evacuate people in case of fire or flood? o Is the route a dead end at a special geologic or some other feature? o Is the route a cherry stem? o Is the route a dry wash that has been historically used as a "cherry stem" or a "spur road" providing access to a collecting site or other important recreational destination?
1287	We expect to see ravens, as a predator, taking significant young and eggs of endangered and threatened native species, and attacking vulnerable adult members of protected species such as desert tortoises, mentioned at least once in the environmental impact statement/report. We expect to see a control program as part of the process. It is wrong to ask rockhounds and other stakeholders to cut back their access and activities so the Raven can continue to prey uncontrolled upon desert species.
1287	The BLM EIR/EIS must also consider all past, current and proposed or anticipated changes which will or have great cumulative impacts to rockhounding and other recreational access. For example, the many alternative energy projects, wilderness and conservation areas, and base expansions, all have had and will continue to result in a taking of public land and access thereto for rockhounding and other recreational activities
Mitigation and Minimization	
1001	No practical mitigation is available for loss of access to such areas, therefore we request that such locations be excluded

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	from closure or restriction and that motorized access, including spur roads and "cherry stems" serving those locations, be maintained.
1002	The purpose of route designation is not the formal recognition of illegally-created routes or the expansion of motorized use opportunity. The tenets of FLPMA must be recognized and undue or unnecessary degradation of public lands, avoided. Route designation is not intended to simply facilitate vehicle use "connectivity;" nor is it merely a paperwork exercise. Networks of varying extent should be evaluated in the associated NEPA analysis, but the governing land use plan guidance and minimization criteria specified in 43 CFR §8342 must be followed in all considered alternatives. Routes designated as open must not unduly impair our natural or cultural resources, air/water quality, scenic values, non-motorized uses of public lands or adjacent/interspersed private lands.
1002	The cumulative number of routes in high relief topography should also be minimized.
1002	A minimal vehicle use network, as opposed to an extensive network, would lend itself to a greater degree of management and control, particularly on public lands in and adjacent to special areas.
1005	If it is determined that there is a loss of recreational opportunities, those loss of those particular recreational opportunities should be mitigated within other designated areas. If one subregion loses mileage of single-track route, than another subregion should designated additional mileage as mitigation.
1006	In addition, where redundant routes exist, as in many parts of the West Mojave planning area, the BLM should identify and evaluate the minimum route system that would designate only the least damaging routes and close all others as part of a second low density/minimum route alternative.
1017	No practical mitigation is available for loss of access to such areas and the SPCW requests that such locations be excluded from closure or restriction and that motorized access be maintained.
1017	All roads must be up for consideration in the road designation process so as to be able to demonstrate true "minimization" which has already occurred in the California Desert Conservation Area.
1027	If it is determined that there is a loss of recreational opportunities, those loss of those particular recreational opportunities should be mitigated within other designated areas. If one subregion loses mileage of single-track route, than another subregion should designated additional mileage as mitigation.
1028	If the loss of motorized routes cannot be mitigated within the project area, then a Motorized Access and Recreation Mitigation Bank must be established. This mitigation bank would keep an overall accounting of the miles and acres of motorized access and recreational opportunities closed and the new motorized access and recreational opportunities created to offset that loss.
1057	any action which leads to a reduction of OHV routes or OHV use areas be treated as a significant impact that must be mitigated.
1089	There should be opportunity replaced and/or mitigated due to losses from renewable energy projects, Military, and clear Creek closures
1100	Numerous unique natural features exist on public lands within the WEMO planning area including springs, seeps and tinajas, that cannot be recreated or relocated. While access roads can be re-routed; natural area features cannot. There are also certain corridors utilized by wildlife that are only found in specific locations within the plan area. No practical mitigation is available for loss of access to such areas and the RACC requests that such locations be excluded from closure or restriction and that motorized access be maintained.
1100	All roads must be up for consideration in the road designation process so as to be able to demonstrate true "minimization" which has already occurred in the California Desert Conservation Area. Routes and route segments that are identified for analysis and designation should include: all routes originally within the 2004 designation pool; all routes identified in subsequent BLM surveys; routes identified by the public; routes considered by previous designation efforts, i.e. Jawbone-Butterbredt ACEC, Rand Mountains Management Area, Ord Mountains.
1100	Mitigation should not become the responsibility of other multi-use stakeholders or occur at the expense of other uses. Public access should not be curtailed or limited to accommodate the possible loss of species resulting from other activities.
1287	We ask the BLM to keep in mind the fact that natural features exist on public lands within the

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	WEMO planning areas are irreplaceable. While roads and campsites can be relocated, mineralogical and fossil deposits occur where nature has very uniquely placed them and cannot be recreated or relocated. Most rock, gem, mineral and fossils found at these locations have characteristics that are unique to that location and are not found elsewhere. No practical mitigation is available for loss of access to such areas, therefore we request that access to such locations be excluded from closure or restriction and that motorized and mechanized access, including spur roads serving those locations, be maintained. Rock, gem, mineral and fossil collection typically requires the use of hand tools and equipment that cannot be packed in or carried long distances, especially by the many elderly or handicapped rockhounds, and are therefore motorized and mechanized dependent.
1287	All roads, even those previously closed, must be up for consideration in the road designation process so as to be able to demonstrate true "minimization" which has already occurred in the California Desert Conservation Area.
1287	Mitigation for loss of habitat or species should not become the responsibility of other multi-use stakeholders such as rockhounds or occur at the expense of other uses such as rockhounding. Public access should not be curtailed or limited to accommodate the possible loss of species resulting from other activities.
1287	There must be adequate identification of rockhounding locations and a meaningful consideration of lost rockhounding locations, or access to such areas, and how such loss might be avoided or mitigated.
Implementation and Administrative Actions	
1002	Routes designated as open for vehicle travel per the BLM's WEMO Plan were found infrequently signed on the ground. Inadequate signing was found to be a significant problem where designated open routes intersected closed routes; with no means on the ground to direct vehicle users to the designated open route. The extent of signing and other implementation actions in certain areas (i.e., Rand Mountains, Juniper Flats and Ord Mountain vicinities) was found to far exceed implementation efforts in the remainder of the planning area.
1002	In general, closed routes were found neither signed nor rehabilitated in any manner that would identify these routes as formally closed to vehicle use. In the few instances where previous closed route rehabilitation has been completed, considerable vandalism and continued vehicle use was observed. Recent tire tracks were observed on almost all routes designated as closed, including within special areas. Many designated open routes were also found to direct vehicle users onto private lands where vehicle-related surface disturbance was noted.
1002	Kiosks and bulletin boards displaying BLM maps of designated open routes were seldom found at trailheads. Published BLM route network maps were found not to have been updated. Information relating to the consequences of non-compliance with vehicle use rules on public land was generally not posted. State requirements for vehicle use and county ordinances relevant to vehicle travel on interspersed private land were similarly absent.
1002	Recommendations offered for improving route designation and vehicle network management include: · Evaluation of potential open routes on the ground by a team of interdisciplinary specialists based on CFR application and aerial photo analysis, coupled with an evaluation of staff capability to manage, maintain and enforce the resulting network; · Improved route signing, primary trailhead kiosk installation with large-scale route maps and use rules, closed route rehabilitation and mandatory use education requirements; · Establishment of an effective, systematic vehicle use monitoring plan conducted on a regular basis by BLM staff, with the details/results made readily available to the public; · Development of a threshold which clearly identifies a level of unacceptable impact to public land resources, at which point affected areas or trails will be immediately closed to the type of vehicle causing such effects, until these effects are eliminated and measures have been implemented to prevent future occurrence; and · The adoption of strategies for effective enforcement of vehicle use on public lands and improved collaboration with city/county law enforcement personnel.
1002	Informing the public of ORV and/or off-highway vehicle (OHV) use allowances is critical in the implementation of route designation. Without appropriate information on the ground, the recreating public has no way of knowing what is allowed and what is not. Public outreach in furtherance of vehicle use management is required by the BLM Manual as well as the CDCA Plan, and was identified as a focal mitigation measure in the 2005 WEMO Plan FEIS. The distribution of current and understandable maps, posting of signs and dissemination of various printed information were to be used in

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	identifying designated open routes and to communicate the rules for vehicle use per the 2003-05 WEMO route designation efforts.
1002	BLM and the State of California should also together consider addressing more effective management of "red-sticker" and "green-sticker" licensed vehicle use on checkerboard ownership lands within the WEMO planning area.
1002	Where route proliferation and free play vehicular activities are known to adversely affect tortoise or other listed species' habitat, and/or pose a risk for listed species mortality within critical habitat, active route network management steps need to be taken in route designation processes. Such steps are recommended to include: · Designating a minimal number of thoroughfare access routes as open within designated critical habitat, as well as and DWMAs or ACECs designated for the species; · Installation of kiosks or bulletin boards at major trailheads, depicting the designated open vehicle route network and rules for legal vehicle use, outlining the importance of the affected habitat for tortoise recovery; · Prominently signing both open and closed routes, with removal of closed route signs following "vertical mulching" or other techniques designed to remove the visual appearance of regular vehicle use on the subject closed route; · Scheduling "vertical mulching" and removal of vehicle use indicators on closed routes intersecting open routes on an expedited timeframe; and Monitoring compliance with the designated vehicle use network on an annual basis, using systematic techniques, appropriate data collection, established thresholds for documented non-compliance, and real consequences (i.e., temporary area closure) for non-compliance as identified by the monitoring program.
1002	Interpretive signing and regular, careful monitoring of vehicle use in special areas is also recommended. Visitors should be informed that any actions which result in surface disturbance or destruction within special areas and elsewhere on public lands are illegal, per 43 CFR 8365.1-5. Timely closed route rehabilitation in special areas should be a BLM priority.
1002	Public land visitors should also be alerted about adjacent or intermingled private lands, as well as relevant state/county laws and ordinances. Information on county/state requirements should be provided at strategically located trailheads, particularly in public land areas bordering the urban interface. Close coordination with local communities is also recommended to ensure direct access to proximal open play areas and known patterns of use are considered, along with private land concerns, during initial route designation planning efforts. State peace officer delegation for BLM Rangers should also be secured to improve law enforcement efficiency.
1002	The implementation phase of route designation includes the posting of signs and maps, provision of information and education, route maintenance and closed route reclamation, law enforcement and monitoring (BLM 2009). Specific actions include: · Publishing and disseminating motor vehicle use maps; · Signing; Educating visitors on travel management regulations and designations; · Enforcing travel management restrictions; · Maintaining designated roads and trails; · Decommissioning/rehabilitating unauthorized roads and trails; · Establishing cooperative and volunteer agreements, fee programs, or efforts to ensure sustainable funding for vehicle use management; and · Monitoring impacts.
1002	Sign vandalism was observed to be common, with little difference in the rate of vandalism between closed and open route signs. While Limited Use (i.e., "vehicle travel limited to routes signed as open") signs were found occasionally posted at trailheads, there was often a lack of information at a distance from these trailheads that clearly informed the visiting public that routes were closed unless signed open, in addition to no open route signs.
1002	The few routes designated as limited to specific vehicle access (rather than open or closed) evaluated in this review (e.g. F2088, F2032) were found unsigned. No information was found posted relating to use limitations. No gates or barriers had been installed. No difference between these routes and open/closed routes in the surrounding area could be ascertained.
1002	Failure to adequately sign a trailhead and associated routes creates very difficult enforcement situations. Vehicle use signs should be customized for site-specific application. Route use restrictions at trailheads should be clearly identified, along with the reasons for the restriction (i.e., to protect resources, to reduce user conflict, to protect wildlife habitat, etc.). Symbols should be used where possible rather than letters, to provide clear, concise direction. The carsonite signs used on individual routes in the WEMO planning area could very easily be modified to provide directional arrows, the terminus of a route where circumstances dictate or even a notation that vehicle use is limited to routes signed as open. Routes designated as limited to a specific use could also be signed according to their limitation, e.g., limited to private landowner, mining operator, etc. unless monitoring indicates additional treatment, such as gating, is necessary to affect

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	vehicle use compliance.
1002	Route signs could also be modified to reflect an admonition that vehicle use non-compliance is a punishable offense. Signs used in nearby national forests employ a symbol design that clearly reflects the allowed use (i.e., full-sized vehicle, motorcycle only, hiking only, etc.), as well as information pertaining to non-compliant vehicle use penalties. As open route signs are the most commonly encountered information conveyance device on public lands, they present the best opportunity to educate vehicle operators about allowed and prohibited uses; as well as penalties for non-compliant vehicle use.
1002	The BLM's policy of not posting closed route signs in the WEMO planning area needs to be revisited. Vehicle use is occurring on unsigned, non-rehabilitated routes. Active, timely management of these closed routes on the ground is necessary to prevent regular use. Closed route signs are a valuable tool which can be used to ensure BLM does not fall into a "black hole" of inaction, which has led to an ineffective vehicle use management system. Where vehicle use is or will cause adverse effects to resources, BLM is required to implement measures to prevent a recurrence of impact. While the physical rehabilitation of closed routes (together with monitoring and enforcement) remains the only long-term solution to halting continued vehicle use, closed route signing should be considered until rehabilitation work can be completed.
1002	The 2010 field assessment suggests rehabilitation of designated closed routes is integral to a successful vehicle use management program. However, field assessment findings also suggest that rehabilitation of closed routes is only one of several necessary management components to a successful program. Other components include: · Signing of open routes with a mixture of line-of-sight open signs and interspersed Limited Use signs explaining that vehicle use is restricted to routes signed as open; · Trailhead kiosks with a map of open routes and posted rules; · Rehabilitation of designated closed routes to the visual horizon through "vertical mulching" and boulder placement; · Timely and persistent repairs of rehabilitation vandalism, utilizing post-cable fencing where necessary in areas of repeated vandalism; and · Ensuring at least minimal presence of BLM or volunteer group personnel on a regular basis.
1002	Vertical mulching, boulder placement and fencing are all valuable tools that can and should be employed to successfully rehabilitate surface disturbance resulting from vehicle use. A careful review of all closed route rehabilitation actions undertaken to date in the western Mojave Desert is needed. Additional actions are likely needed to safeguard investments made with BLM funding and by the COHVC with taxpayer-generated funds. Additional management actions could include mandatory vehicle use education for California "Green-sticker" Program vehicle use in rehabilitation areas, increased resource monitoring, law enforcement patrol, specific area closure concurrent with rehabilitation work, or all of the above.
1002	Interpretive closed route signing explaining how and why rehabilitation work has been initiated may reduce levels of non-compliance and vandalism.
1002	A rigorous monitoring program should minimally be instituted when closed route rehabilitation projects are completed. A monitoring program can identify the most efficient means of achieving rehabilitation objectives, minimizing vandalism and protecting on-the-ground work investments. Where monitoring identifies vehicle use non-compliance or project vandalism, an area closure should be considered, per Executive Order 11989.
1002	Levels of vehicle use non-compliance, resource management need/damage severity may need to be ranked in order to facilitate adaptive management. Limited staff and rehabilitation funding should be directed where they are needed most. However, lower priority rehabilitation needs should also be tracked to ensure they do not fall completely off the radar of network management tasks. Rehabilitation prioritization should also be adjusted where funding opportunities are identified.
1002	In Fiscal Year (FY) 2010, the BLM (2009c) received an increase of $5 million to support programs and partnerships that engage youth in natural resource management. In FY 2011, the BLM continued to fund these programs, as well as direct $1.0 million in base funding to support a new public-private partnership program with the National Fish and Wildlife Foundation. In addition to COHVC grants, this "Youth in Natural Resources" funding should be considered for implementing closed route rehabilitation within the WEMO planning area.
1002	BLM is required to mark designated areas and trails in a manner that use limitations are easily understood. All official BLM maps should be updated to reflect the current authorized route network. The required educational features of the RMMA Education and Permit Program and its associated map information should be duplicated throughout the WEMO planning area. Whenever route designations are modified, DAGs and other official maps should be revised in a timely manner. Interpretive language included on these maps or otherwise imparted by BLM officials should be clear, concise,

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	consistent and unambiguous as to what is required by visitors engaged in vehicle use activities. Additional interpretive information could also be included on these maps to improve their usefulness and functionality, as well as contribute to the BLM's overall vehicle network management program (refer to Appendix C).
1002	A high resolution map of the BLM's official designated open route network should be prominently displayed at primary trailhead kiosks or bulletin boards. Such mapping should clearly direct vehicle operators to the authorized route network. Additional map boxes with available handout maps may also prove useful in directing vehicle operators to approved routes of travel. Information pertaining to local and county riding ordinances, particularly those applicable to SBC (i.e., Ordinance 3973: Off-highway Motor Vehicle Use), as well as state and federal laws addressing off-road vehicle use, should also be posted at trailhead kiosks and/or bulletin boards. This information should indicate that penalties are to be applied for vehicle use violations and that applicable rules are strictly enforced.
1002	Limited use signs, identifying that vehicle travel is allowed only on routes signed as open, should also be posted at primary trailheads, particularly where no kiosk or bulletin board is constructed. Numbered "open route" signs should be posted at regular intervals along designated open routes; particularly where open routes intersect closed routes.
1002	Additional decals informing visitors that vehicle use is allowed only on routes signed as open should be affixed to open route signs, as these signs are intended to be the most commonly encountered information conveyance device used in the WEMO planning area vehicle management program. Open route signs should also indicate that there are penalties for vehicle use violations, as is commonly done with route markers on national forest land.
1002	Agency presence in the field and public education is sorely needed. This presence could be in the form of Law Enforcement/Park Rangers or other BLM personnel. Local media should be used to improve public education about BLM's route network and rules for use.
1002	BLM should also utilize volunteer groups where available to assist in education/route rehabilitation/signing efforts. Where volunteer group hours are used as a basis for BLM grants, the associated grant funds should be directed to the area where these volunteer work hours are being generated. BLM Field Office-requested base funding should be used where appropriate.
1002	In summary, BLM is required to monitor vehicle use. While some vehicle use monitoring has been conducted in the BLM's Rand Management Area, the WEMO Plan FEIS does not indicate that BLM has developed a specific monitoring plan for the remainder of its designated route network. The public has not been informed of how BLM intends to monitor vehicle use.
1002	Effective monitoring could be guided by past direction identified in the BLM's (1980b) CDCA Plan (Appendix D: Attachment 1 [Off-road Vehicle Monitoring Guidelines]). Consistent with the Open Government Directive (OMB 2009), the BLM's reporting of monitoring results should make use of existing agency websites to the maximum extent practicable to promote transparency and accountability. Guidance recently proposed and clarified by the CEQ (2010, 2011) succinctly identifies this specific direction for improving agency mitigation and monitoring: 1. Proposed mitigation should be considered throughout the NEPA process. Decisions to employ mitigation measures should be clearly stated and those mitigation measures that are adopted should be identified as binding commitments to the extent consistent with agency authority, and be reflected in both NEPA documentation and decision documents. 2. A monitoring program should be created or strengthened to ensure mitigation measures are implemented and effective. 3. Public participation and accountability should be supported through proactive disclosure of, and access to, agency mitigation monitoring data.
1002	Monitoring reports, access to documents, and responses to public inquiries should be readily available to the public through online or print media, as opposed to being limited to Freedom of Information Act (FOIA) requests made directly to the BLM.
1002	Unfortunately BLM has not focused law enforcement in non-compliance areas, nor has the WEMO Plan been amended to reflect recommendations for increased on-the-ground agency personnel. Nor is there any indication that enforcement or other BLM personnel presence has increased since the WEMO route designation was formally adopted. A number of similar law enforcement actions and vehicle use management strategies have been prescribed by BLM nationally. While this direction was not found to be incorporated into the 2003-05 WEMO route designations, these types of measures should be considered in the future: · Strengthen existing or develop new law enforcement agreements with state and local law enforcement agencies wherever feasible; · Explore establishing... a system of 1-800 numbers to give citizens a convenient and timely method for reporting motorized OHV concerns;

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	· Patrolling techniques should reflect the types of activities taking place on the public lands, such as the use of all-terrain vehicles (ATVs), motorcycles, etc.; · Adopt patrol techniques, including community policing that will enhance visitor contact and user compliance; · The BLM will work with adjacent land managers, landowners, and local law enforcement agencies to develop more consistent and coordinated enforcement techniques on all lands; · Prepare an annual law enforcement report that contains summary data and illustrative examples of BLM enforcement actions related to motorized OHV management; and · As part of BLM's comprehensive motorized OHV education program, prepare information that describes legal consequences for violating motorized OHV regulation (BLM 2001).
1002	Unfortunately, most of these areas have subsequently been relegated a low priority for management action implementation. The Kramer Subregion, supporting several special areas and a DWMA within an urban interface area with extensive illegal vehicle use, has been assigned a priority of 18 out of 21 implementation work areas (BLM 2011a-d). The Fremont Subregion, a subregion possibly containing the highest density of illegal vehicle routes in the WEMO planning area, has been assigned a priority of 14. The El Mirage Subregion, located adjacent to the El Mirage Open Area, a priority of 16. The Mitchell Mountain Range northwest of Barstow, where uncontrolled vehicle use issues have been identified (BLM 2003a, 2005a), a priority of 20. The Red Mountain and El Paso subregions that support extensive desert tortoise and other at-risk resources have been assigned a priority of 20. The East Sierra Subregion with its many riparian habitat resources, a priority of 21. Per previous CDCA Plan and/or WEMO Plan amendment criteria, the above areas merit a much high priority for active management.
1005	For off-highway users wanting to do the right thing and stay om designated roads and trails, the lack of signage makes that compliance nearly impossible. For roads and areas that are not designated for travel, signs must be erected indicated this very clearly.
1012	Lateral/parallel roads (OHV tracks, etc.) to major roads might be closed – but BLM's expensive attempts to camouflage them in the Ord Mt. region have largely failed – and "closed" signs don't survive long. The Plan needs to reflect on-theground reality with minimal ranger patrols.
1013	Thoughtful planning for the future should recognize the variety of users of this resource and how to accommodate them while protecting the flora and fauna. We believe that the best way to do this is by recognizing trails that have already existed for many years and add improvements like rating by difficulty (novice, intermediate, expert), descriptive trail markers, and historical points of interest. As evidenced by over 40 years of use by motorized Off-Highway Vehicles, this area's trails are maintained by natural environmental events (wind and rain) without the need of man's intervention or financial resources.
1013	Required maintenance for this system could be done by volunteers, thereby saving on maintenance costs. The Jawbone Canyon Store Trail System Team is ready, willing and able to supply volunteers to implement and maintain the proposed trail system project in partnership with the BLM.
1013	By opening single-track and quad trails and providing the opportunity the public is seeking, the BLM will undoubtedly have a large reduction in law enforcement expenses. Compliance will greatly increase if the BLM will provide a diverse trail system including significant single-track and quad trail systems.
1013	The BLM has been using barriers, posts and fences extensively in the Jawbone area to block trail access and cross country travel. In order to keep the proposed trails at their designed single-track or quad width, we suggest using similar barriers and fencing at key intersections, which only allow vehicles of certain widths to pass through. Our volunteers would like to help install them.
1015	All roads MUST be signed CLOSED.
1015	I am concerned that there is no signing of open or closed roads in an open as all roads in an open area are open even when unsigned. I think the BLM must insist to the judge that roads be signed closed and the open roads unsigned or signed remain as they are.
1016	In those areas that have pictographs, petroglyphs, scientifically significant locations (middens and caves and such), BLM should not post signs or construct kiosks and where they are currently existent they should be removed. Where possible the road should lead past and not call attention to the "arc site". Where these sites are currently signed the signs should be removed.
1016	All roads designated closed through this process or any other process, must immediately be signed CLOSED.

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1017	Routes, regardless of jurisdiction, should be signed so that the public knows what is available and can stay on designated routes.
1020	BLM must include plans to educate OHVers sufficiently to get their compliance
1020	BLM must provide useable route descriptions
1020	BLM must implement density management in such areas.
1021	The original ROD WEMO plan calls for an education program for the Rand mountain management area with a small fee implemented. The education program should stay in tact, the fee should be dropped. The fee was never addressed in the last go around of stakeholder input, it was snuck in during draft of the ROD.
1025	The EIS should also address education and enforcement activities to increase compliance with the designated routes. Designated routes need to be signed open. The EIS needs to identify mechanisms for closing and rehabilitating undesignated routes, as well as mechanisms for preventing future route proliferation.
1026	Because many of the existing routes are in sensitive areas, language should be added to WEMO Plan 2.3.6 Monitoring, Adaptive Management and Implementation section to identify the specific monitoring program that will ensure that the agency does not authorize routes in sensitive areas that it cannot monitor.
1027	For roads and areas that are not designated for travel, signs must be erected indicated this very clearly.
1028	Site specific monitoring of motorized versus non-motorized use must be provided for each route.
1028	line of action and all education measures should be exhausted before pursuing other actions. There are situations were education is far more effective than law enforcement.
1033	In addition, in some areas, off-road vehicle use is occurring within Caltrans ROW, adjacent to the traveled way (e.g. State Route 14 in the Jawbone area, near Red Rock State Park). Besides being a safety and liability concern, such use also can destroy native plants and soil, and can create additional highway maintenance and safety problems due to erosion. Please address methods to inhibit such use (e.g. enforcement, education, etc.) and to repair damage.
1033	If any routes currently accessing a State highway are to be closed, the BLM should consult with the nearest Caltrans District office to cnsure closure is done with a treatment appropriate to the situation so as to prevent continued use (e.g. re-vegetation, mounding of earth, etc.).
1042	Kiosks must be placed at all entry routes to the sub region and include something about the specialness of the region as well as the rules, dangers and how to reach law enforcement and emergency services.
1046	8) Monitoring: The need for annual monitoring has been identified since the very first 1980 Desert Plan.
1046	We do not agree that closed routes should be marked with a sign.
1046	Damaged signs must be repaired/replaced immediately. If parking/staging is to be allowed, there needs be a barrier to limit the size appropriate for the area.
1046	Descriptions and the significance of riparian areas for wildlife should be described on signs appropriately placed at the hiking trailhead to such an area as well as on kiosks for motorized visitors.
1055	Law Enforcement It has been demonstrated from the existing network of illegal routes, widespread examples of soil erosion, violations and accidents, complaints from residents, observations in the field and law enforcement activity that the BLM currently does not have the capacity to enforce the law regarding ORVs on the lands under their jurisdiction. During large ORV events, law enforcement personnel are concentrated and rural communities are left defenseless against the influx of riders from surrounding areas. The designation of ORV routes must be based on a calculation including the capacity of the BLM to adequately monitor and protect areas with designated routes. This calculation alone will greatly reduce the extent of the designated route network. No management plan will be effective without a sufficient force to protect the lands within the management area.
1055	Route Designation Terminus The designation of open ORV routes must be accompanied by a route terminus sign since those routes without such a sign encourages trespass onto private property, public lands and roads off-limits to green sticker vehicles. This is a very serious problem since without the indication of a terminus, riders continue on designated routes past their ends. This leads to trespass on private and public lands and many of these routes cross rural roads leading to the potential for collision with local traffic. The failure of the BLM to place route terminus signs on designated routes places the agency in a position of liability for potential accidents and trespass.

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1055	Large Format Signage and Informational Kiosks in TM 3 The BLM has been mandated by the court to erect large format signage and kiosks at all areas where there has been shown to be significant ORV use. The kiosks must include: • a statement of the relevant laws, penalties for violation and contact information for local law enforcement • a large scale map of the area that includes open routes and areas off-limits to ORVs including private property and rural communities, ACECs, wilderness areas, wildlife corridors and lands off-limits to ORVs • a short description of the impacts of ORVs on soils, vegetation, wildlife habitat and cultural resources • the components of the TREAD Lightly campaign • safety information including age limits, use of helmets and other safety gear The BLM must install 12 kiosks in the Morongo Basin including the following locations: • between Interstate 10 and Morongo Valley on Highway 62 at Indian Canyon Road • on Highway 62 in Yucca Valley at the top of the Morongo grade • at the corner of Highways 62 and 247 • at four locations between Highway 62 and Interstate 40 on Highway 247 • at two locations on Highway 62 between Yucca Valley and 29 Palms • at two locations on Amboy Road between Adobe Road and Iron Age Road • at Highway 62 and Godwin Road In addition, the BLM must install kiosks at the Fort Mojave, Chemehuevi and Colorado River Indian Tribes tribal lands in collaboration with representatives from those tribes. ORVs have been responsible for the destruction of tribal lands and invaluable sacred sites on all three of these reservations.
1060	Enforcement - the crux of the problem lies in enforcement. Unlawful motorized travel created many of the roads that are excessive today, and are the reason the BLM is attempting to create an appropriate route designation plan. Consideration should be given to enforcement in the plan. An educated public may reduce the need for future enforcement. Education of local sensitive plants and animals may help reduce the impact to those species. Information on road status should be available in several technology appropriate fonmats. Consideration should be given to an education program in the plan.
1071	I see that unlicensed kids on ORV's are not a problem on the combined use highways/roads, as long as they have had training and are supervised by a proper adult. (This also should be specified in the WEMO plan, and in local signage) So this mitigates my idea of having 2 parking lots (one at each end of Randsburg) for families to walk their kids into town (as I mentioned on the phone to you this morning). But I and others, still think that a couple of parking lots for ORV'S would be a good thing
1071	And the "Sign" part on the road. It would make it easier for them to identify trails, and thus, augment BLM enforcement officers "duties". My idea of the value of this as a subtle enforcement tool, especially applies to the "90 degree" crossing of ORV's across paved roads/highways. should also be a part of your (BLM) sign criteria. I see it nowhere I have been in the desert. It is for safety, and lets the on-highway traffic know to keep their eyes open for others (probably slow moving), crossing the highways and roads. It could also be used for enforcement in very subtle ways, to keep people on trails, and more importantly, inform CHP and other "unknowing-of-local-trails" officers, of who is on and off "designated" trails, as they drive by in their normal duties
1071	Allow someone/s to sign BLM,s Rand area maps/permits from the local area, for unknowing visitors. Staff the BLM info table with at least one local person, who has a local view, this is not a paid job. Seek out local balance.
1071	These signs are so ineffective, that they can be construed as graffiti. An example: When you go 45 mph on a paved road/street, the sign is about 2 feet square. When you go 45 mph off road, and concentrating on other things, signs are about 4 inches square on carsonite stakes. What is wrong with this picture: 4 square feet vs. four inches square? The Kiosks are full of info made to read at a desk and from a piece of paper 8 1/2 X 11", and at arms length. I maintain, that an adolescent ORV'er should be able to ride up to a kiosk and see a stylized map and know where to go,--- without stopping his engine, taking off his helmet, and dismounting and walking up to the kiosk for info. (We don't do this in normal driving.) Few do this in the Desert. And then, the info is "inaccurate, incomplete and confusing".
1072	At least put Dead-End signs up to keep people from cutting entirely new trails once they come to the end of these newly signed open routes!
1081	Many locations may have cultural resources. In those areas that have pictographs, Petroglyphs scientifically significant locations (middens and caves and such), BLM should not post signs or construct kiosks. Where possible the road should lead past and not call attention to the site.
1082	A reasonable administrative remedy exists in such a situation where an existing mining claim is made inaccessible by a

Table C-2. Scoping Comments by Comment Category

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	road closure. The remedy consists of the issuance of an administrative permit that would permit access to and from an existing federal mining claim by means of a motorized vehicle. The result of the issuance of such a permit would have negligible impact on the existing environment because only very limited access solely for the purpose of accessing a specific mining claim site would result. The BLM would continue to receive an annual maintenance fee from the miner and the miner would not de facto be deprived of the investment of his time, ingenuity, productivity and property interests.
1087	All roads MUST be signed CLOSED. There is no signing of open or closed roads in an open area, as all roads in an open area are open even when unsigned. I think the BLM must insist to the judge that roads be signed.
1087	Roads leading to extreme riding or driving places, which are few and far between, should be posted.
1089	Matter of fact, the entire concept of "Closed unless marked Open" is not a practical one, there are too many checkerboard properties this cannot function
1089	The Rand education program the fee should be dropped. The fee was never addressed in the last go around of stakeholder input it was snuck in during draft of the ROD
1095	BLM must erect informational kiosks in access areas with accurate maps, relevant laws and how to contact law enforcement.
1095	In Limited Use areas the maximum speed allowable should be 15 mph.
1095	BLM should maintain the policy of "Closed unless signed OPEN"
1095	More enforcement, heavier fines for ORV law violations
1098	Can we have a clear system, using footprints on signs for hikers, hoof prints for horses, single/double tire marks for motorcycl/ATV?Jeep use etc?
1100	Routes, regardless of jurisdiction, should be signed so that the public knows what is available and can stay on designated routes.
1100	All closed roads MUST be signed CLOSED. This is the most important concept in this entire planning activity and the BLM having failed to do so, is the reason the public is looking at the route designation process again. In the rest of the world and even in the open areas within the planning boundaries a route must be signed closed or gated to let the public know where they may go.
1101	It has been demonstrated from the existing network of illegal routes, widespread examples of soil erosion, violations and accidents, complaints from residents, observations in the field and law enforcement activity that the BLM currently does not have the capacity to enforce the law regarding DRVs on the lands under their jurisdiction. During large DRV events, law enforcement personnel are concentrated and rural communities are left defenseless against the influx of riders from surrounding areas. The designation ofDRV routes must be based on a calculation including the capacity ofthe BLM to adequately monitor and protect areas with designated routes. This calculation alone will greatly reduce the extent of the designated route network. No management plan will be effective without a sufficient force to protect the lands within the management area.
1101	The designation of open ORV routes must be accompanied by a route terminus sign since those routes without such a sign encourages trespass onto private property, public lands and roads off-limits to green sticker vehicles.
1101	The BLM has been mandated by the court to erect large format signage and kiosks at all areas where there has been shown to be significantORY use. The kiosks must include: • Statement of the relevant laws, penalties for violation and contact information for local law enforcement • Alarge scale map ofthe area that includes open routes, areas off-limits to ORVs including private property and rural communities. ACEes. wilderness areas, wildlife corridors and lands off-limits to ORYs • Ashort description ofthe impacts ofORYs on soils, vegetation, wildlife habitat and cultural resources • The components ofthe TREAD Lightly campaign • Safety information including age limits, use ofhelmets and other safety gear
1101	Historically, there are no designated OHV trails in this area. and the public is asking for these parcels to be closed once and for all. and having signage posted to that effect. There needs to be BLM LEO presence to enforce the law so that our public lands and surrounding private property can be protected from OHV trespass.

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1120	We should preserve and mark this historic trail
1127	Map: Red Moutain Signage and route access to Cuddeback Dry Lake and the surrounding area
1146	Since this is a motorized designation process, care should be utilized in making sure there is continuity is numerical signing of routes. The present WEMO signing is ambiguous in the numbering of trails. Many times it is unclear where a contiguous route actually goes. There is a confusing array of numbers not seen before and not on any readable maps available to the general public.
1163	Education program: This program should be eliminated in the Rands, but in its place be implemented in all of the WEMO areas, as a simple education program. This program was put on the Rands, without any input from anyone but BLM, and to say it only belongs to Rands is wrong. The Sierra club and CBD used this education element of Rands to shut down a perfectly legal trail, (a trail that is fenced in on both sides). Thus, that alone tells you how wrong this entire program is. It is missing the mark, we want to educate the Public and Desert Managers Group are spending millions on that, so why should Rands be held hostage on something that is desert wide?
1251	To successfully meet the challenge of effectively managing vehicle use on public lands situated adjacent to private acreage, we believe a concerted public education and route signing effort, BLM field presence and closed route rehabilitation and signage effort is necessary.
1251	Improved route signing, primary trailhead kiosk installation with large-scale route maps and use rules, closed route rehabilitation and mandatory use education requirements;
1251	Establishment of an effective, systematic vehicle use monitoring plan conducted on a regular basis by BLM staff, with the details/results made readily available to the public; • Development of a threshold which clearly identifies a level of unacceptable impact to public land resources, at which point a specific course of action will be undertaken by BLM to prevent future occurrence of these impacts; regular basis by BLM staff, with the details/results made readily available to the public;
1251	The adoption of strategies for effective enforcement of vehicle use on public lands and improved collaboration with city/county law enforcement personnel.
1256	Closed unless signed open will not work in the checker boarded West Mojave.
1256	3--Calif. DMV rules of the road say closed ways are signed. 4-- Caif. Parks and Recreation use closed signs. 5--Municipalities in and around the desert use closed signs. So the problem exists that trail riders coming on BLM limited use lands from Cal City for example or the open areas would tend to ride on unsigned trails.
1256	6-- You can not sign private land and many trails cross private land and in many incidents the trails split on private land and therefore the rider would not know which fork to take. In closing I would like to say, the idea that it doesn't have a sign must mean its on private property will be what people will think. You must put closed signs up for it to work.
1256	Route signage should be changed to coincide with surrounding area laws "open unless signed closed"
1265	RC3329 - Should take this sign down and put one up that says closed. This road dead ends into my salting area for cattle and the wilderness. People thing it is an open area.
1284	The designation of ORV routes must be based on a calculation including the capacity of the BLM to adequately monitor and protect areas with designated routes. This calculation alone will greatly reduce the extent of the designated route network. No management plan will be effective without a sufficient force to protect the lands within the management area.
1284	The BLM has been mandated by the court to erect large format signage and kiosks at all areas where there has been shown to be significant ORV use. The kiosks must include: • a statement of the relevant laws, penalties for violation and contact information for local law enforcement • a large scale map ofthe area that includes open routes and areas off-limits to ORVs including private property and rural communities, ACECs, wilderness areas,

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	wildlife corridors and lands off-limits to ORVs • a short description of the impacts of ORVs on soils, vegetation, wildlife habitat and cultural resources
1284	The BLM must install 12 kiosks in the Morongo Basin including the following locations: • between Interstate 10 and Morongo Valley on Highway 62 at Indian Canyon Road • on Highway 62 in Yucca Valley at the top of the Morongo grade • at the corner of Highways 62 and 24 7 • at four locations between Highway 62 and Interstate 40 on Highway 247 • at two locations on Highway 62 between Yucca Valley and 29 Palms • at two locations on Amboy Road between Adobe Road and Iron Age Road • at Highway 62 and Godwin Road
1287	All routes, regardless of jurisdiction, should be signed so that the public is provided reasonable notice regarding which routes are available for use and which are closed so that members of the public can make educated decisions on which routes to use.
1287	All closed roads MUST be signed CLOSED. In the open areas within the planning boundaries a route must be signed closed or gated to let the public know where they may and may not go. We are concerned that there is no signing of open or closed roads in an open area, as all roads in an open area are open even when unsigned. The BLM must insist that closed roads be signed closed and the open roads unsigned or signed remain as they are. Anything else is too confusing to the public to provide adequate notice.
1288	Consider BLM-County MOU using USFS MOU as a template and more active participation in the quarterly meetings of the interagency taskforce (USFS, County Code Enforcement, BLM, including LE) to enhance implementation monitoring and compliance. USFS LE contact is Curtis Davis, their Chief Ranger. Their MOU provides easy access to State (OHV probably) Grant $$ that are approved through the taskforce to do reclamation and other route maintenance activities. A three-way partnership could improve $$ return for BLM. Also, code enforcement is consistently turning $$ back to the state at the end of the year that it cannot spend.
1288	Rehab strategies and activities: USFS would like to have a coordinated effort on implementation (closures, restoration, signing, kiosks) along the boundary with a focus on Deep Springs/Warm Springs area where significant work was completed during the Willow Fire closure in 1999. USFS is interested in contributing needed resources to make this more effective (manpower and equipment)—may wish to pursue through an MOU (avoid more NEPA), similar to our AML MOU with the State. This would demonstrate implementation actions to the court and provide a mechanism to evaluate the feasibility of the motorcycle network concept based on response of the OHV community. If can get compliance, can support motorcycle network concept. If not, may need to take more aggressive actions in the area and oppose further expansion.
1296	Route Designation: Signs. It has come to my attention that certain BLM staff and/or at least one Sierra Club Member are removing and or relocating and GPSing signs when they disapprove of roads which under the court ordered BLM process have been designated open access. I don;t know if the new GPS information has been entered into the data base. An example occurred in the Darwin area where there is a watch committee. BLM put up the open access signs. A few days later certain signs were removed and after I mentioned this to Jack and Eddie the signs went back up. It is my understanding that the removal and or repositioning of open access signs occurred throughout the WEMO area. I have been told the number of signs removed/gone is in excess of 100. I have not heard how many were moved.
Travel Management Area 1	
1001	Some areas such as the entire Cady Mountains are very rich mineralogically and have special importance to rockhounds. Every effort should be made to maintain or restore motorized and vehicular access to as much of the Cady Mountains and other similar areas as possible.
1001	Southern Cady Mountains CN 112604, 115209 - Searchers use this route to access rockhounding areas, please keep open. Spur routes

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	usefuVneeded for parking/turnaround. Many rockhounders elderly and this is the only way they can access rockhounding areas. CN 112516, 1183239, 1183240, 115211, 1183262, 1183265 - same as above CN115228, 1026231 - same as above CNI184745 - same as above. Jeep trail used to run NW rrom 2.5-mile mark but documentation is dated 1950s and may have been washed out. Searchers say some use on jeep trail still occurs; nothing visible on airphotos. CN 1026223, 1026222, 1184790, 1026224 - same as above CN 1183202 - wash route leaving north rrom this segment (34.772 116.327) has been closed for restoration. Searchers would like vehicle access for older club members up this wash.
1001	Manix Wash Collecting Field Includes but not limited to CN 135290, 1045834, 1045837, 1045838, 1045839, 1045845, 1074269, 1128331, 1128332,1128343,1130624,1130672,1167834, 1167835, 1167836, 1167837, 1167838, 1167839, 1167840, 1167841,1167842,1167843,1167844,1167859, 1167860, 1167861, 1167862, 1167863, 1167864, 1167865, 1167866 - Searchers request that these routes become or remain open. Manix Collecting Field (Field CAl (peg not sure if this is the same area) CN 1128332, 1128343, 1130625, 1130672-3, 1167836-8, 1167840 - Searchers request that these routes be designated as open for access to rockhounding areas.
1001	Afton Canyon Area south of Mojave Rd.lAC9610 between Afton Canyon Campground and east.7 ofa mile - fairly extensive rockhounding area. Searchers request that routes into the area be developed and designated open, especially from the trestle .7 miles east of the campground.
1001	Baxter Wash (south of Afton Canyon) Kim has information that she needs to bring in for this area. Access currently allowed on AC9606 into the area; USGS maps show jeep trails that have not been digitized. (check with Kim's source when she brings it in).
1001	Broadwell Lake/Crucero Road off 1-40 CN 1183375 - BL8660 - designated open. Searchers request that this route remain open for access to rockhounding area. CN 1183317-20 - BL881 0 - designated open. Searchers request that this route remain open for access to rockhounding area. C 1026227, 1184745 - BL971 0 - designated open. Searchers request this route remain open for access to rockhounding area. CN 1184782-4 - BL9730 - Main route designated open, a spur is not. Searchers request that the open route remain open and the spur become designated open for access to rockhounding areas. C 1026224 - BL9741- Designated open. Searchers request that this route remain open for access to rockhounding area. C, 1026226 - BL9720 - Designated open. Searchers request this route remain open for access to rockhounding areas.
1073	Map or Subregion Name and Number: Broadwell Lake Subregion Route#: AF137 Comment: Route AF137 is a a canyon as scenic as Afton...The Problem: AF137 is over 8 miles to the slot and back, which could be done in a day, but one could never hike all the amazing side canyons with out hiking out for water...Using AF132 as a substitute to connect to AF137 means crossing steep jagged rock terrain...Closing AF137 would be a huge loss.
1073	Map or Subregion Name and Number: Broadwell Lake Subregion Route#: Branches from AF042 Comments: Access to hiking areas that would be extremely difficult to reach with out this road. Physically, it is a well established raod. It allows hiking to the highpoint of a ridge of hills along the south side of hidden valley for amazing views across hidden valley and Cave Mountain to the Avawatz Mountains and south accross to the Rodmans and Newberrys.
1093	Map or Subregion Name and Number: Broadwell Lake Subregion Route #: AF137 Comments: Please reconsider the closure of these routes for the benefit of those who cannot access them without vehicular transportation. Thank you.
1111	Map Name and Number - Afton County Detailed Map 2 Route# - AC9616, BC 9470 Grid Location -

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	Point of Interest - Comment Type - Extends south to meet BL9470 and form the only towing route thru the area and access to the rock hounding area from the south avoiding Afton train track. If adversely affects bighorn lambing, limit seasonally.
1111	Map Name and Number - Afton County Detailed Map 2 Route# - BL 9470 Grid Location - Q7, Q6, R6, S6 Point of Interest - Comment Type - Site Specific The route does not continue in the direction of the dashed open route to AC7815 on map and instead continues NE in the wash to meet AC 7815. Should revise location and maintain as open this extension of route (and eliminate dashed extension where there is no route). [Attatched Map]
1111	Map Name and Number - Afton County Detailed Map 1 Route# - Cady WSA Grid Location - 1-8, 1-9, J9, J8, K8 Point of Interest - Comment Type - Site Specific The route should be open instead of AC9606 because this is the correct route for the rock hounds loop. It is not shown on your map but continues back to intersect AC9606
1138	The Cady Mountains should continue to have open dirt roads
1255	Afton Canyon and Broadwell Lake Subregions: This includes the Cady Mountain Wilderness area, which is covered by limited vehicular routes, but which provide supplemental chronological data (paleontological fossils, volcanic ashes, and paleomagnetic measurements) that extend the chronology into older rocks of the Mojave Desert. The Cady Mountain area is not as well known as the Mud Hills area but the chronologie data in both areas are complimentary and will prove more valuable as the Cady Mountain area becomes better known. Please don't close access to these areas so that researchers can develop the chronological resources available in each, to extend our knowledge of these resources, and to monitor and protect the resources.
1260	This letter presents established routes to significant localities shown on the Afton and Broadwell Subregion Maps. Previous research in these areas has been conducted by Miller (1980), Moseley (1978), Woodbume (1998), and Reynolds (20 1 0). Access routes to localities pass through sections listed below and are shown in red on the attached maps. T Il N, R 5 E, Sec's 35, 36 T Il N, R6 E, Sec's 27, 2 8, 29, 31, 32, 33, 34 T 10 N, R 5 E, Sec's 31, 32 T 10 N, R 6 E, Sec's 4, 8, 11, 12, 13, 14, 31 T 10 N, R 7 E, Sec's 6 T 9 N, R 5 E, Sec's 2, 3, 4, 6, 7, 8, 13, 22, 23, 27, 28 T 9 N, R 6 E, Sec's 34, 35 T 8 N, R 5 E, Sec's 4, 6 T 8 N, R 6 E, Sec's 2, 3, 4, 9, 10, II T 8 N, R 7 E, Sec's 2, 3, 10, 15, 22, 23, 25. Please maintain these routes in an "OPEN" status to allow continued access for management and protection of significant, nonrenewable paleontological resources.
1261	Geology areas follow and access routes are shown in red on the attached maps. T Il N, R 5 E, Sec's 35, 36 T 1 1 N, R 6 E, Sec's 27, 2 8, 29, 31, 32, 33, 34 T ION, R5 E, Sec's 1 T 1 0 N, R 6 E, Sec's 4, 5, 6, 8, 1 1 T 9 N, R 7 E, Sec's 21, 22 T 9 N, R 6 E, Sec's 21, 28

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	T 8 N, R 5 E, Sec's 6 T 8 N, R 6 E, Sec's 3, 10 T 8 N, R 7 E, Sec's 7, 15, 30, 29, 28, 27, 26 Please maintain these routes in an "OPEN" status to allow continued Earth Science education, family camping and hobby collecting.
Travel Management Area 2	
1001	Darwin Hills CNI161556-560, 1161607-9, 1162524, 1186357 - Rts SE64 and 66 - Searchers request these remain open for access to rockhounding. CN I 161587, I 161592, 1161590, I 161617 - Anaconda mining area - Searchers request these remain open for access to rockhounding.
1001	Klondike Chalcedony Rose Field C 109237, 112739,334542 - routes not designated. Searchers request these remain open for access to rockhounding.
1001	South of KlondikelRt. 66 CN 112768 (NS7967) - Designated open. Searchers request that this roule remain designated open to the ghost camp for access to rockhounding area.
1019	Formal visits to Darwin Mine, Cerro Gordo Mine, Snow Cap Mine in Owens Valley region and many others have been excellent opportunities for my students to learn about historical and reactivated mines from geologists in the local regions of California. Having access to these mines and other mineral deposit locations helps our next generation learn from experienced mining personnel and BLM geologists in the process.
1019	Educational geology areas reached on the attached maps include all roads and trails prefixed by "SE" (Sierra and Darwin Subregions) and all roads and trails prefixed by P (North Searles Subregion) and all roads and trails prefixed by "RM" (South Searles Subregion)...Please maintain these areas as open to to allow continued earth science education, family camping and hobby collecting.
1044	We also request that BLM designate a staging area or areas for off-highway travelers, to minimize traffic, dust, and noise impact on Darwin residents. The abandoned mill site in Lucky Jim Wash could be one possible staging area.
1044	It is essential to maintain alternative routes for entering and exiting Darwin in case of road closures on Highway 190 and the Darwin Road. Some of the currently designated routes serve this purpose in case of emergency. These include: SE19/SE9/SE75; SE19/SE47; and SE66.
1044	The currently designated open routes in the Darwin Subregion are essential for access for purposes of recreation, hiking, bicycling, mining, education (geology classes), hunting, etc.
1044	The main roads to Darwin, namely, Highway 190 and the Darwin Road, are sometimes impassable owing to flooding, snow, or rock falls. It is essential that safe alternative routes be available for entering and exiting the town in case of emergency. The following routes are needed for this purpose: SE19/SE9/SE75; SE19/SE47; and SE66/unmarked road 11.
1044	Darwin's water line road (west of and parallel to SE40, and not currently marked as open), provides access to Darwin's pipeline, and must remain open. This road should not be designated as open for offhighway travel, owing to the sensitivity of the pipeline, which runs alongside this road.
1044	The route currently marked as SE24 should remain open all the way to its end, because this provides access to the ridge that Darwin residents plan to use to relay a microwave signal from Lone Pine or Keeler for broadband service to Darwin.
1044	The area around Darwin is very dry. There is no groundwater in Darwin, and sensitive areas such as Long's Well and Black Spring are accessible only by hiking. The roads that lead to the trailheads are essential for access to these interesting areas. By distributing traffic over a network of roads, as on Lower Centennial Flat, the current route system minimizes the damage that more focused heavy impact might create. The existing route system providing access to the historical mining areas around Ophir Mountain and the southern Darwin Hills allows for exploration of the mines, provides access for hiking into more remote areas, and distributes the impact of modern traffic in historically heavily disturbed areas.
1044	SE9 Alternate exit/entrance to Darwin. Access to Centennial Flat. Main artery – connects SE75 to SE19. Great

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	views throughout this route, and access to hiking, botanizing, and mining areas. Auto travel. [NOTE: Not properly identified on map at highway intersection.] SE18 Access to Black Spring. Access to hiking area. SE19 Alternate exit/entrance to Darwin. Access to Black Spring. Great views. Access to hiking, wildflowers, historic mining areas. Connects and completes loop to Darwin. Auto. Popular. SE20 Interesting road leading into Coso foothills. SE21 Interesting road leading into Coso foothills. SE22 Interesting road leading into Coso foothills. SE23 Loop to Centennial Flat. Alternate route from Darwin to Centennial Flat if pass into Centennial Flat is blocked. Very interesting views and terrain. Access to SE24 (see below). SE24 Access to proposed site for relay of broadband signal to Darwin. SE25 Access to Long's Well trailhead. Important area for hiking and viewing wildflowers. Camping at trailhead. Auto/bicycle. Popular. SE26 Access to historic mining area. [Note that there are two SE26's on large map.] SE28 Access to historic mining area and inholdings. Excellent for rockhounds. SE30 Access to mining area. Important for geology, hiking. Auto/4X4. Popular. SE31 Connects Darwin Canyon Road (#11) to mining area east of Ophir Mountain. Becomes 4X4 where route is currently unmarked. WEMO-1044. SE32 Access to hiking route to top of Ophir Mountain. Interesting canyon. SE33 Access to mines. Beautiful drive in interesting historical area. SE34 Access to historic mining area. Interesting area for rock collectors. SE35 Access to historic mines. Calcite hole. Rock collecting. Access to lava fields. SE36 Provides access to small spur roads where there are mining inholdings. SE40 Access to SE41 and NAWS gate. Continues into scenic area. SE41 To NAWS gate. ESSENTIAL FOR ACCESS TO WATER LINE ON NAVY BASE. SE42 Connects SE40 and SE43. SE45 Access to large camping area. Spur roads to many old mines, of great historical and geologic interest. Excellent starting point for hiking in the Darwin Hills. Auto/bicycle. Very popular. SE46 Short spur route provides access to extensive hiking area. Great views. Wildflowers. SE47 Alternate exit/entrance to Darwin. Makes loop from Darwin Road to SE19 and Darwin. This was once the historic road into Darwin. Interesting and varied terrain. SE48 Short spur road providing access to historic mines. Access to large hiking area. SE49 Connects SE19 and SE47. SE60 (Route marker on the ground; not on map.) Access to Jackass Mine. Spectacular overlook of Panamint Valley and Darwin Wash. Popular. SE61 Access to Zinc Hill (geology, history). SE62 Access to scenic and historic mining area. Important route. SE63 Access to Zinc Hill (geology, history). SE64 Access to Zinc Hill (geology, history). SE65 Access to large historic mining area. Camping area. SE66 Alternate exit/entrance to Darwin. Sometimes referred to as Zinc Hill Road. Access to Darwin Canyon, Darwin Wash, China Garden, Zinc Hill. Extremely interesting geology all along this route. Very important road. SE67 Access to extensive historic mining area. Excellent hiking from end of road. Spectacular overviews of Darwin Hills. SE68 Access to historic mines and extensive hiking area. Steep 4X4 route leads to a spectacular viewpoint. SE69 Access to mines and extensive hiking area. SE70 Access to Centennial Canyon SE71 Access to Centennial Canyon Trailhead. Spectacular views. Hiking up historically important canyon. SE72 Access to clay pits. SE73 Access to Timbisha Shoshone tribal lands. Access to clay pits. SE75 Main artery – access to SE71, SE9, SE72, and complex of roads on Centennial Flat. UNMARKED ROUTES: 1 Small connecting road loops S19 and S25. Auto/bicycle. Popular

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	2 Small loop circles Darwin Cemetery. Historical interest. Community access for funerals. Auto/bicycle. Popular. 3 Darwin airstrip. Provides access to other roads. Auto/bicycle/airplane. Popular. SHOULD NOT BE USED FOR CAMPING OR STAGING 4WD TRIPS. 4 N 36 17 15 W 117 36 56 Spur to Mt. Ophir trailhead. Important access to hiking. Auto/bicycle. Popular. 5 N36 17 9 W 117 36 50 Access to Kellogg mine area. Short spur to trailhead. Wildflower canyon. Access to extensive hiking area. Auto/bicycle. Popular 6 N 36 18 25 W 117 38 30 Short spur branches to 3 campsites. Auto/bicycle. Astronomical observation point. This complex of small roads is very important to local residents. Spectacular viewpoint. Campsites. Cell phone access (no cell service in town of Darwin). Important for emergencies when land lines are not functioning. 7 Connects to #5, makes loop to Darwin Road. Auto/bicycle. Popular. 8 Loops SE33 and SE26. This short and interesting route connects mining areas. 9 N 36 18 25 W 117 38 29 Leaves #6 and goes to bicycle trailhead. Bike route. Popular. 10 N36 18 26 W 117 38 25 Campsite. Popular in summer, occasional use in winter. 11 Main route from Darwin to Darwin Canyon. Access to mining roads. Essential exit/entrance route from Darwin to Panamint Springs. Auto/4X4. Popular. 12 Darwin Water Line Road (west of and parallel to SE40). Provides access to Darwin's pipeline. Should not be used for recreational traffic, which should travel on SE40). 13 Loop to SE31. Connects Darwin Canyon Road (Zinc Hill Road, #11) to SE30/SE29. Access to many mines. 4X4. 14 Access to Long's Well for maintenance of water source. 4X4. Hike to spring. 15 Access to historic mining district. Complex of several roads leading to important mines. Spectacular views and excellent hiking.
1044	we request that BLM acknowledge that Darwin's water line road (parallel to and west of SE40) must remain open to provide access to the transmission line carrying Darwin's water supply. This is not, and should not be, a designated route for recreational off-highway travel due to the sensitivity of the pipeline.
1044	The currently designated SE24 provides access to a ridge that Darwin residents plan to use for microwave equipment, to transmit a signal from the Owens Valley to Darwin, once the Digital 395 fiberoptic cable has been installed.
1044	Many off-highway routes converge on the inhabited area of Darwin as a hub. To reduce noise, dust, and traffic impact on Darwin residents, we request that BLM designate a staging area or areas outside of town so that off-road travelers can unload and mobilize their equipment without disturbing town residents. One possible area for staging would be the abandoned mill site (N 36 16.131 W 117 35.917). The air strip should not be used for staging, because it is currently in use and needs to be available at all times for landings and takeoffs. Also, excessive high-speed vehicular traffic on the air strip degrades the surface, making it unsafe for use by aircraft.
1044	SITE A Suggested location for staging area for OHV travel, in general area of abandoned mill site west of Lucky Jim Wash (N 36 16.131 W 117 35.917).
1044	SITE B Proposed location for microwave relay for broadband to Darwin. (See SE24.)
1045	the advent of the Digital 395 project in the Eastern Sierra will open up an important broadband corridor. In order to benefit from this new fiberoptic backbone, Darwin will need to install communication facilities to send the signal from Lone Pine to Darwin, via an intermediate relay point. If the road providing access to this relay point were to be closed, that would kill Darwin's chances of utilizing this signal.
1075	1)darwin subregion and 2) the sierra subregion...further restricting roads now in use will further constrain humanity from accessing nature. with so few roads in this region the closure of any road precludes access. those with a passionate need to "be in nature" will eventually be restricted to the nearest paved hiway or at best a major dirt road with no opportunity to leave that road. those who would camp are told to camp alongside the open dirt thoroughfare. this is often not possible without obstructing other travelers and besides, it's dangerous. leaving small dead end spur roads open would allow campers to dispurse and enjoy their experience. how would you like to experience nature as a view from the narrow shoulder of a dangerous hiway with no hope of offroad access?
1075	1)darwin subregion and 2) the sierra subregion...the closure of well used roads up long alluvial fans in the california

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	desert is a statement to urban dwellers that they will no longer be able to enjoy weekend access to the desert mountains. a 5-8 mile hike to a former trail head subtracts a whole day from mountain exploration.
1075	rather than comment on specific roads by number my recomendation/comment is to leave all the roads in the darwin and sierra subregions open. we need them.
1117	Map Name and Number - N. Searles Route# - P11 N. Grid Location - Sect 13 T26S R44E Point of Interest - Comment Type - Keep open as single track north of pavement ending and extend s. from section 36 to pass on P67 as single track. Serve horse, motorcycle, and bike access to Manly Pass
1119	I would like to see Route SE28 connected to Route SE26. This is an existing two track road of crushed road and sand, and has been in existence for many decades. There are no riparian areas on this section, and completing the route will lessen impact on the road itself. There are some historical mining areas that can be hiked to rather easily and has good views of lucky Jim Wash. SE26 continues for a bit, and dead ends at the Darwin Falls Wilderness. 2. Route SE28A is a nice, historical, loop route. This is a 4 wheel drive loop with passage on a early 1900 style road and accesses an interesting mining area. At the cross-over at the top, there are several hiking routes to historical sites higher up. The route is in good shape; mostly small rock, sand and gravel, but steep and a bit rough, and technically interesting. There appears to be no riparian areas. There is one mine shaft that might eventually need a bat gate. 3. This little side road off SE30 leads up to a couple of interesting head frames and some hiking trails up to more interesting historical sites. There are excellent views from the top of the hill to the west. 4. This little side trail off SE30 leads to what appears to be a machine shop/building and a mine headframe. It is one of the few standing buildings in the area and the height of the mining pad allows a nice view of the surrounding area. Historically interesting and a great photographic area. This is a long preexisting road made of mostly crushed rock, sand and gravel, It meanders through several different eras of mining activity and connects the upper western Lucky Jim Wash with the eastern side of Ophir Mountain. It is historically interesting and has great views of the Panamint Mountains and the Zinc Hill areas. It eventually connects to the eastern entrance road to Darwin. The short side roads lead to small historic mining areas. Connecting this route to SE 60 allows a complete loop without backtracking through Darwin and lessens impact on the area. This is an extremely scenic, historic, and interesting route. Very historically photogenic and many opportunities for hiking. 6. This cluster of short roads all lead to historic mining areas. All appear to connect to the main eastern road into Darwin. 7. This is the main road into Darwin from the east and connect Darwin with SE66, the Darwin Wash Road. 8. This cluster of interesting routes connect the main eastern Darwin entrance road with many early mining areas. Lots of history, hiking opportunities, and of course picture taking. All of these roads are also somewhat technically interesting to 4x4 enthusiasts. They also connect SE45 and SE 60 with many interesting sites 9. These roads connect one huge, historical mining site with several eras of workings. All are good roads and lead to different areas. Lots of hiking trails. These trails connect with routes on non posted private property and allow a continuous route to some interesting mining areas and outstanding views of the countryside from many angle. 10. This loop would allow access to the airstrip and cemetery without going through the town of Darwin proper. This would also be a possible site for a staging area for events that require trailers and such to park and unload cargo, both animal and motorized. This

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	would stop some of the trespass inside the town site of Darwin. 11. This is the main western entrance between Hwy 190 and the town site of Darwin. This should be an Inyo Co. road. 12. This partially paved road was once part of the historic Keeler to Darwin Road. I'm told it was bypassed when the present entrance (see comment 11), road was built. The two open routes. SE68 and SE69 lead to scenic overlooks, and allow a very scenic view of the Darwin Wash for many miles. To me it's very spiritual and quiet. and allows to really see some of Mother Nature's beautiful work. 14. This isn't actually a road. It is mostly the bottom of the Darwin Wash and is mostly loose sand. It is a loop off of SE66. I've mostly seen just motorcycles and sand rails on it. [attached map]
1121	Map Name and Number - N. Searles Route# - P102 extends south to P140 Grid Location - Sec. 27 and 34 Point of Interest - Comment Type - Extend to connect to P140 bypasses airport, avoids conflict w/ indian wells residents and golf course.
1121	Map Name and Number - S. Searles Route# - Grid Location - Sec. 26 T27SR42E, extend east to across RM 3163 Point of Interest - Comment Type - Move GR? Line S. to match on ground and extend to connect on existing route for 2008-2010 dual sport to P140 on edge of map
1122	Map Name and Number - S. and N. Searles Route# - RM6140 to P158, P125 Grid Location - Point of Interest - Our personal property Comment Type - Maintain right to access our private property would consider right to pass to trailhead at end of P125
1142	We also request that BLM designate a staging area or areas for off-highway travelers, to minimize traffic, dust, and noise impact on Darwin residents. The abandoned mill site (N 36 16.131, W 117 35.917) could be one possible staging area.
1142	Subregion: North Searles Route #: P68 Acces to Manly Pass that gives access to Paramount Valley
1142	We, the undersigned, request that all currently designated off-highway travel routes in the Darwin Subregion remain open. In addition, we request that BLM acknowledge that Darwin's water line road (parallel to and west of SE40) must remain open to provide access to the transmission line carrying Darwin's water supply. This is not, and should not be, a designated route for recreational off-highway travel due to the sensitivity of the pipeline. It is essential to maintain alternative routes for entering and exiting Darwin in case of road closures on Highway 190 and the Darwin Road. Some of the currently designated routes serve this purpose in case of emergency. These include: SE19/SE9/SE75; SE19/SE47; and SE66/Darwin Canyon Road.
1142	Map: Darwin Route #: SE 24 Access to microwave relay site
1143	The Darwin Mine was developed in 1873 with water rights located in the Darwin Wash and a pipe line and utility easement CA8872 (also not shown on your map). The pipe line is underground in places and on the surface in others. There are dozer track that have been used to access the ridge lines, vents, and power poles and lines. Without access to our site, ventilation, and secondary escape routes, we would face serious safety issues.
1146	Darwin, North Searles Valley, South Searles Valley Subregions are huge amounts of archeological, geological, scenic and historical sites in these areas. Lack of use should not be a criteria for eliminating these routes.

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1157	Grid Location - T05R38E, Sec. 28, 32, 37 Connect SE881 to SE867 to form loop.
1157	Grid Location - T17R38E, Sec. 17 Connect Hwy 190 to SE9 OHV experience
1157	Map or Subregion Name and Number: North Searles What is the Issue/Concern/Opportunity? See attached map for locations. 1) Motorized access should be available to the Sand Dunes on this road. 2) This road is currently posted Closes, it provides a great view and should me marked Open as shown on BlM map. 3) This trail actually goes through and has been used for years by Endurance horse races and Dual Sport rides. In recent years jeeps forged a way through. Because of the total lack of single tracks, it should be designated Open to motorcycles only. 4) This trail does not exist. 5) There is an existing single track between the end of the Radio access road and Manly Pass. It has been used by Endurance Horse races and should be designated Open for Motorcycles. 6) These jeep roads are designated Open on the ground but show closed on this map? 7) There is an existing single track down this canyon that is used by local horses and motorcycles. There is also a single track trial that completes a loop. Because of the total lack of single track, they should be designated Open.
1157	Map or Subregion Name and Number: Darwin What is the Issue/Concern/Opportunity? See attached map for locations. 1) This map is very confusing as it does not show Open county roads but rather shows them as closed BLM roads. This is a paved county road and should show as Open some how. 2) This old road was paved at one time, provides access to many old mines, and is now a single track in the narrow canyon. Because of the total lack of single track, ~ this route should be designated Open. v\: 3) This route appears to provide a loop experience and therefore should be)-, 0}f'l'l designated Open. ~ 4) Again this is paved county road and should show as Open some how. 5) This must be a mapping error and obviously should be designated open
1157	l.Map or Subregion Name and Number: Sierra Map 1 What is the Issue/Concern/Opportunity? See attached map for locations. 1) This route has been used for Dual Sport events, is shown open but is not marked Open on the ground. It should be designated Open. 2) BLM map is very confusing, there are two aqueduct roads, two power line roads, the old SP RR grade, and abandoned sections of Hwy 395. They should all be designated Open. 3) This route provides a great Loop opportunity for motorcycles. It should be designated open to motorcycles only. 4) There was a single track in this location that used for many motorcycle events but has been destroyed by a new road going to a geothermal plant on the state land to the south. The single track should be rebuilt by the road builder and designated Open. 5) This route provides a much more direct connection to the Loop to the open rouj e coming from the south.
1157	Map or Subregion Name and Number: Sierra Map 2 What is the Issue/Concern/Opportunity? See attached map for locations. r-:(' tt" 1) BLM map is very confusing, there are two aqueduct roads, two power line roads, t::'s-S the old SP RR grade, and abandoned sections of Hwy 395. They should all be designated open.)
1157	rCOMMENTS: Map or Subregion Name and Number: Sierra Map 3

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	What is the Issue/Concern/Opportunity? See attached map for locations. 1) This is a single track connecting two BLM roads. It was built by the DWP in the early 1900s to survey the fal/line for the Aqueduct tunnel through the mountain to the west. Because of the total lack of single tracks, this should be designated open]
1157	What is the Issue/Concern/Opportunity? See attached map for locations. 1) This is a 2-track that is next to C1 sandwash that is more desirable than old race course that is soft sand. It should be designated Open. 2) This is a single track that has been used by many Endurance horse races and Dual Sport rides. It provides an exceptional view of the Pinnacles. Considering the total lack of single track, it should be designated Open. 3) This is a 2-track that provides a more recreational exit from Pinnacles area, it should be designated Open. 4) These are all either pipeline or power line roads that should be designated Open to the public not just utility companies
1254	This letter presents established routes to significant localities shown on the Sierra Subregion map of the Sierra Polygon. Numbered access routes that need to remain open are listed below. Unnumbered access routes that need to remain open are shown in red on the attached map. Routes prefixed with "SE" 2, 3, 9, 10, 18, 19, 20, 21, 70, 71, 72, 76, 430, 432,433, 748,752,756,776,777,778,858,859,860,867, 869,870,984,986, 987 Please maintain these routes in an "OPEN" status to allow continued access for management and protection of significant, nonrenewable paleontological resources.
1256	Map or Name - N. Searles Route # - Grid Location - T24SR45E Sec. 14, T24SR41E Sec. 28 Point of Interest - Single Track Trail Comment Type - Site Specific This is a crecent-shaped trail that allows riders to ride from pioneer point up and around indian wells and back w/o disturbing residents at indian wells
1256	Map or Name - S. Searles Route # - RM3150 Grid Location - T25SR41E Sec. 14, 6 Point of Interest - Comment Type - Site Specific Taking 3150 is the main way for dual sport events to connect off-road between ridgecrest and trona. 3150 should go through sec 12 and meet 3147 in sec 6.
1272	If you must close roads, here are a few hat I would not see a problem with closing: 1) SE 46 & SE 38; 2) SE 42; 3)Unmarked route #1 (see map); 4) Unmarked route #7 (see map)
1277	Closing roads will restrict access to important hiking areas.
1279	[Identified Important Routes] SE71 - Auto, SE75 - Auto, SE9 - Auto, SE19 - Auto, SE25 - Auto/Bike, 1 - Auto/Bike, 2 - Auto/Bike, 3 - Plane/Auto/Bike, 4 - Auto/Bike, 5 - Auto/Bike, 6 - Auto/Bike, 7 - Auto/Bike, SE47 - Auto, SE24 - Auto, 13 - 4x4, 9 - Bike, 10 - Campsite
1281	Without access to our site, ventilation, and secondary escape routes, we would face serious safety issues. MSHA representative John O'Brien is trying to schedule a visit to the Darwin Mine sometime in May, 2012, and I am sure he will concur.
1281	We have tried to depict the areas of concern. However, with one hundred forty years of workings, we feel a buffer zone, allowing us access to the complete property holdings would be appropriate. As we have safety concerns for our employees as well as the public.
Travel Management Area 3	
1002	The threatened Parish's daisy (Erigeron parishii) is one of many special status plant species restricted to the western Mojave Desert (BLM 1999b, 1999c) that can be adversely affected by vehicle travel. It is found along washes, canyon bottoms or loose alluvial deposits on adjacent benches (Sanders 1998). Off-road vehicle travel is common in portions of

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	the Carbonate Endemic Plants Conservation Area and Bighorn Subregion; both of which have a high potential to support this species. Vehicle travel can result in soil disturbance, crushed/destroyed vegetation and potentially introduce non-native plants. As vehicle camping and parking can also occur within 300 feet (91.4 m) of designated open routes per the CDCA Plan (BLM 1980b, 1999a), it is critical that route designation in Parish's daisy habitat take into account the risk of vehicle use/parking/camping impacts to this species. There is no indication in the WEMO Plan that occupied or suitable Parish's daisy habitat was screened as a significant consideration in BLM's 2003-05 route designation effort.
1002	The endangered least Bell's vireo, southwestern willow flycatcher and yellow-billed cuckoo have been reported from riparian areas along the Mojave River (Patten 1998; Unitt 1998; Laymon 1998). These species are suspected to utilize this habitat type where it occurs at springs and along creeks in the Juniper and Bighorn subregions during migration. The yellow-billed cuckoo has been reported from Arrastre Canyon (C. Stubblefield, pers. comm. 2012) during the migration season. The threatened Inyo California towhee is known to nest in riparian habitat within the Argus Mountains (USFWS 1987); specifically within the Great Falls ACEC. ORV use has resulted in the direct loss of desert scrub and riparian habitat in this area
1042	1. Areas and trails shall be located to minimize damage to: Soil: Arrastre Canyon, Lovelace Canyon, Grapevine Canyon, Deep Creek Canyon and many of the other sites in the area have thin, granitic soils and hilly terrain which are especially susceptible to erosion. The many limestone outcrops may support rare plants. Watershed: Almost all streams and drainage goes into Arrastre Creek near the Arrastre Waterfall beside JF3330. Cottonwood Creek with its tributaries drains into Arrastre Creek near Bowen Ranch Road. Additionally, creeks in Upper Arrastre Canyon drain into Arrastre Creek near the VP mine and routes JF3221M, JF3259M, JF 3219M. Other watersheds in the area are drainages into the Deep Creek and the Mojave River, Lovelace Canyon and Grapevine Canyon. The watersheds in the region are predominately hilly terrain with numerous rocky outcrops and thin granitic soils. Vegetation: Most trails in the area originate from old mining roads. Historically, hunting and grazing activities have continued use of the old roads. Unfortunately, many of these roads have led to riparian areas and with continued and increasing use this leads to excessive degradation of riparian vegetation. BLM must be aware of and take into account that just because intermittent use in the past resulted in acceptable levels of degradation, continuation of that use and opening up the roads to pure recreation will have a devastating impact on riparian vegetation. Almost all the riparian areas are still in need of clean up from mining/grazing. Motorcycle trails have emerged along cattle paths many of which lead from one riparian area to another and along streams. While cattle paths often disappear in a season, once they are used by motorcycles they remain and become eroded and the spread of non native plants is increased. Air: Although most of the soils are granitic gravel, with continued use, the gravel becomes pulverized resulting in a power-fine particle that is easily airborne. There are also numerous limestone outcrops. Other resources of the public lands: The Juniper Sub Region contains important prehistoric and historic sites both within and outside the Juniper Flats ACEC. Native Americans certainly used the natural resources in the area for hunting, food gathering, and habitation etc., including water sources, vegetation and rocks.
1042	2. Areas and trails shall be located to minimize harassment of wildlife or significant disruption of wildlife habitats. Special attention will be given to protect endangered or threatened species and their habitats. Motor vehicle trails should not be located within a mile of streams, seeps and springs. Motor vehicle access to such areas as Arrastre Waterfall has resulted in the stream side being used as a camping area and the stream as a toilet, target shooting etc. The area around the stream is becoming denuded of vegetation and gravel from the erosion due to OHV hill climbing and use of an equestrian trail closed to motor vehicles is heading towards the stream.
1042	3. Areas and trails shall be located to minimize conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or neighboring public lands, and to ensure the compatibility of such uses with existing conditions in populated areas, taking into account noise and other factors. Some of the activities that may not be compatible and need special consideration are: 1) Motorcycle riding vs. hiking/horseback riding/running/mountain bike riding 2) Target shooting vs. picnicking/rock climbing/hiking/horseback riding/mountain biking/running 3) Motorcycle riding vs. grazing 4) Hunting vs. nature appreciation

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	Many residents in the Milpas Highlands area have complained of noise generated by OHV use on the nearby BLM lands in Arrastre Canyon. They are also acutely aware of the danger of the narrow, twisting Powerline Road when used by OHV drivers engaging in berm play and cutting shortcuts along the road. Many people use the Powerline Road (JF3330) for hiking and horseback riding. It has a long history of abuse by OHV traffic and its twists and turns all have numerous OHV shortcuts, some so wide that it makes it difficult to determine which is the "real" road. To date, there are no designated hiking paths; however, it seems all paths become abused by OHV riders. This includes the short 100 foot path to Arrastre Waterfall, and many cow paths and equestrian trails that crisscross the region. The historic Native American foot path to Deep Creek has also been severely degraded by OHV traffic. Cows make new paths each winter during their grazing season and in the spring and summer these are used by motorcycle riders. Many people visit the Juniper Flats area for quiet, for hunting and for watching wildlife. Noise from motor vehicles travels many miles through the area, especially when vehicles are speeding up steep hills. Target shooting and hunting are becoming dangerous issues for other visitors, especially because many people are heard and seen discharging weapons that are not shotguns. The Juniper Sub Region is a shot gun only area, but that is not being enforced, and safety is a concern.
1042	4. Areas and trails shall not be located in officially designated wilderness areas or primitive areas. Areas and trails shall be located in natural areas only if the authorized officer determines that vehicle use in such locations will not adversely affect their natural, esthetic, scenic, or other values for which such areas are established. "ACECs are an administrative designation made by the BLM through a land use plan". The management plan for the Juniper Flats ACEC (1988) included several routes through the area. Since then, miles of motorcycle trails have been created by rogue riders. Some of these trails are natural extensions of routes that abruptly terminate or join another route at 90 degrees. Others parallel designated roads. Will the BLM need to amend the ACEC management plan if new routes or uses are to be approved within the ACEC?
1055	the WEMO routes crossing through the Shadow Mountain Road neighborhood of Wonder Valley constitute an attractive nuisance.
1055	Unless BLM, either acting independently or in concert with local law enforcement, can demonstrate better control of the illegal and nuisance ORV activity generated by the TMA 3 routes located in the Wonder Valley community, they must either close the routes or limit use of same to street legal travel only.
1055	All BLM routes in the Morongo Basin adjacent to private property, wilderness areas and fragile habitat should be permanently closed. In addition, the BLM should erect physical barriers and disguise these routes with vertical mulching to discourage trespass. Routes that have been closed in the area near the Poste Homestead Natural and Historic Area are regularly breached by ORV riders who have demonstrated no respect for the closures. This area is in need of physical barriers on the west side of the adobe ruins and Chadwick Road should be closed to all ORVs.
1055	ORV routes should be eliminated on Gammel Road, along the Cleghorn Lakes and Sheephole Mountains Wilderness Areas and routes near the boundary of Joshua Tree National Park. Since the greatest biodiversity in the Mojave desert resides in washes and ephemeral waterways, and ORV activity has been shown to destroy vegetation and wildlife habitat and disturb desert soils, all routes in washes should be eliminated. In addition, all currently designated routes through the Morongo Basin that lead directly to into private property and therefore encourage trespass must be eliminated. These routes should never have been designated in the first place and are the result of a faulty computer-designed decision tree and the failure of the BLM to conduct ground-truthing investigations in these areas. The BLM should endeavor to avoid making the same mistakes that led to the current court order.
1084	RC 3329: This road should be closed it dead ends right at the salting area for my cows.
1084	RC 3343; There should be speed limit signs on this OHV Corridor 15MPH. For the safety of the cattle, horses and the rancher and his family. They should also post that this is a 4 mile road, 10 feet wide and the wilderness is closed to all vehicles. (They should really remove the signs they put up because people think they are open routes)
1097	I am writing to you to express my concern and dismay particularly with the establishment of Route WV 1948, that runs through my neighborhood an my community of Wonder Valley, California. This route runs directly across some major thoroughfares in my neighborhood Gammel and even more traveled daily by local residents, Godwin Rds. These are county maintained dirt roads.
1097	This is a recipe for disaster. There are many older residents in Wonder Valley that travel these roads to do their grocery

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	shopping etc. It will be a matter of time only in my opinion until somebody gets broadsided by a speeding dirt truck or off road vehicle racing down this newly established rout.
1103	Juniper Flats Subregion: The Crowder Formation (Reynolds et al, 1998), Phelan Peak Formation and the Old Woman Sandstone (Sadler, 1982; May and Repenning, 1982) in this area contain vertebrate fossils that describe the age of the sediments involved with timing of the tectonic uplift of the San Bernardino Mountains that reach 11,000 feet elevation. The existing BLM routes with the prefix of "JF" must be kept open for resource management purposes.
1103	Rattlesnake Canyon Subregion: The Pioneertown sandstones and basalt dikes and flows as old as 10 million years, (Neville, 1983; Neville et al, 1985; Reynolds and Kooser, 1986) assist with describing the timing of the tectonic uplift of the San Bernardino Mountains. BLM routes prefixed with "RC" must be kept open for resource management purposes.
1123	Map Name and Number - Rattlesnake Canyon Route# - Grid Location - Point of Interest - Comment Type - Open to vehicles? In brn-rd. terminates at my property - you want to maintain your access
1124	Subregion: Rattlesnake Canyon Route #: RC1430 Burns Canyon Roads Proj. Fund - Maintained by property owners but used by others causing increased maintenance costs
1153	Map Name and Number - Johnson Valley/Rattlesnake Route# - RC3418, RC3435 Grid Location - South of Hwy 247 Point of Interest - Comment Type - Site specific Numbered routes feed into dirt roads in the community of Johnson Valley. Signage is needed - entering community roads "no outlet"
1154	Map Name and Number - Coolgardle To make sure there are roads to access mining claims looking at map cannot locate through roads.
1250	More specifically, the Mojave Group is very concerned about the Juniper Flats Sub Region and the great destruction which is taking place in that area. Since this is a transition area between the large population of the Victor Valley and the San Bernardino Mountains, there are a large variety of recreational uses taking place and not in a compatible manner. As other recreational areas are disappearing due to growth, more pressure is being placed on the Juniper Sub Region where illegal motorcycle use is rampant and illegal trails are appearing everywhere. Residents in the area and in adjacent Milpas Highlands are subjected to noise, dust, trespass and harassment.
1265	Route # - RC3343, RC3329 Site Specific Comment There should be a 15mph sign posted on this OHV corridor road for the safety of me and my family, my cattle and horses.
1268	Map Name and Number - Thomas Guide GPS Pg 4660 Route# - Van Dusen Canyon 2 Grid Location - Point of Interest - Comment Type - Site specific I use Van Dusen Canyon Rd. to 3N83 to access my claim Gold Digger III
1268	Map Name and Number - Thomas Guide GPS Map 390 Route# - Gold Crown Rd. Grid Location - Point of Interest - Comment Type - Site specific

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	I need to use Gold Crown Rd. off Route 62, 29 Palms to access my claim Blackjack Claim for placer mining purpose.
1271	TMA 3 WEMO travel management plan. I have resided in the community of Wonder Valley for over 30 year!? and have a long standing Interest in the welfare of the community as a resident, home owner, and business owner in that community. Since the Inception of the NEMO olanning process, I have observed a steady deterioration in residential quality of life and peaceful enjoyment both for myself and numerous neighbors. This can directly be attributed to the reckless disregard displayed by the BLM's Implementation of off - road recreation routes throughout our community coupled with a demonstrated inability to manage the adverse affects of the off road recreation being promoted and abetted by these routes.
1271	Three of the WEMO routes in my community cross Shadow Mountain Road. As a resident of the Shadow Mountain Road area I observe the previously described violations by non - street legal ORVs on a daily basis, and even more frequently during off road holiday riding periods. Given current management and enforcement practices, the WEMO routes crossing through the Shadow Mountain Road neighborhood of Wonder Valley constitute an attractive nuisance.
1282	Off-Road Vehicle routes have no place in this environment. They add noise and dust to a dust control area already out of compliance. They encourage trespass onto state and private parcels. Users of these routes often ride at excessive speed and nearly all of these routes cross or are crossed by multiple public roads with no signage. Current routes actually cross private parcels with no compensation to the landowners. Some routes border on wilderness areas encouraging ingress to these areas.
1282	The multiple and poorly marked routes in the adjacent Dale Mining district, combined with no BLM enforcement in this area, have resulted in large areas of the district looking far more like an off-road vehicle use area than it does a historic mining district. This heavy use in the mining district results in ORV activity overflow spilling into the lower basin generally reducing the quality of life for residents here.
1283	We do not want ORVs riding through our residential area making a lot of noise, stirring up dust and destroying our beautiful desert flora. Not only are they riding on private properties and roads illegally, but they tear up our roads that we pay to have maintained through our tax dollars.
1284	Since significant biodiversity in the Mojave desert resides in washes and ephemeral waterways, and ORY activity has been shown to destroy vegetation and wildlife habitat and disturb desert soils, all routes in washes should be eliminated.
1284	All BLM routes in the Morongo Basin adjacent to private property, wilderness areas and fragile habitat should be permanently closed. In addition, the BLM should erect physical barriers and disguise these routes with vertical mulching to discourage trespass. Routes that have been closed in the area near the Poste Homestead Natural and Historic Area are regularly breached by ORY riders who have demonstrated no respect for the closures. This area is in need of physical barriers to protect fragile dune resources on the west side of the adobe ruins. Chadwick Road may remain open to licensed vehicles but should be closed to all ORYs.
1284	ORY routes should be eliminated on Gammel Road, along the Cleghorn Lakes and Sheephole Mountains Wilderness Areas and routes near the boundary of Joshua Tree National Park.
1284	In addition, all currently designated routes through the Morongo Basin that lead directly to into private property and therefore encourage trespass must be eliminated. Specific routes include: Pipeline Road (AKA UK on WEMO Map #80, Chadwick Road, and Old Stage Route (AKA MP235 on WEMO Map #80). These routes should never have been designated in the first place and are the result of a faulty computer-designed decision tree, a violation of the BLM's own guidelines and FLPMA, as well as the failure ofthe BLM to conduct ground-truthing investigations in these areas. The BLM should endeavor to avoid making the same mistakes that led to the current court order.
1284	In addition, the BLM must install kiosks at the Fort Mojave, Chemehuevi and Colorado River Indian Tribes tribal lands in collaboration with representatives from those tribes. ORVs have been responsible for the destruction of tribal lands and

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	invaluable sacred sites on all three of these reservations.
1285	I live in the Wonder Valley and don't believe that off-road vehicles belong in our residential areas.
1288	Motorcycle trail plan being initiated in the Oak Springs, Grapevine area on USFS lands i. This may affect route network on BLM between Coxey truck trail and Grapevine Canyon roads in T3N, R2W, Sections 9-10 and 11. Issues with Balanced Rock mining claimant (active claim).
1288	Considerations for BLM TMA3 route network: Poor planning and coordination could lead to additional trespass issues on BLM. Also an opportunity because a well maintained network could help alleviate some of the pressure in the Deep Creek and JF ACEC and redirect motorcycle use further south and east on USFS lands.
1288	Specific route issues: i. 3384 and 3382, South of Castro's place and Deep Creek provide connection to an unauthorized network; ii. 3355M: via unauthorized connector to 3N59A in T3N, R2W, Sec 9; iii. 3359M, just w. of 4N16 (Grapevine Canyon Rd) in T3N, R2W, Secs 11-12; iv. 3215M, a bit further east in T3N, R2W, Sec 12; v. Warm Springs Road, T3N, R3W, Secs 13-14; vi. RC3203: Close or limit access route depending on status of mining claim (active or inactive) in T3N, R2E, Sec 21. Check with Scott Aliason; vii. RC2217, T1N, R3E, Sec 22 to unauth. Shortcut route directly south in Sec 27 (official acess is Sec 22 to 23 to 26 to 27).
1291	Because of the many existing roads, questionable boundaries and general porosity of the area [Viscera Springs], the fences and rock barricades have created a dangerous situation. Two weeks ago I was driving on an open road and ended up trapped behind the fences and barricades. If I had not known the area well, it could have been possible that I would not have been able to find my way back out. [attached map]
1291	I am questioning the legitimacy of the closures occurring on the National Forest land. I am not questioning the legitimacy of the Bighorn Mountain Wilderness Area located on BlM land. During passage and implementation of the California Desert Protection Act in 1994, I paid close attention to the process, and to the best of my knowledge only the portion of this Wilderness Area located on BlM land was discussed or included on the maps. I have been in contact with both BlM and Forestry regarding this issue. Both agencies have stated that the Bighorn Mountain Wilderness Area was designated as part of the California Desert Protection Act of 1994. I have received maps from both agencies and some are in conflict. Map 23 (Attachment 1) from the California Desert Protection Act of 1994 does not show'the Viscera Springs area currently being closed is included in the Bighorn Mountain Wilderness Area. I have requested a legal map from the Forestry Service showing that the area around Viscera Springs was included in the Bighorn Mountain Wilderness as part of the Desert Protection Act of 1994. So far they have not been able to produce it. All the Forestry Service has been able to provide is a topographical map (Attachment 2) with no land marks or other identifiable locators on it. One thing that this map does show is that the area is flat, open and has many established roads that make it literally impossible to successfully close and enforce without putting a fence around the whole area.
1293	My husband and I drove through Joshua Tree National Park and out to Highway 62 on Old Dale Road over the weekend. A few miles from the north end of the road, we were surprised to see a huge encampment of off-roaders. We had been out there three weeks earlier, and never saw another vehicle. Do you know if this was some sort of permitted event? They had erected markers with the letters "FCM" along Gold Crown Road from Highway 62 to the encampment area. For miles, all the washes, trails and roads -- and a few places that were not washes or trails -- were hashed up with tire tracks. Little roads that a few weeks ago were 20 feet wide are now 40 feet wide and deeply churned. I was shocked at the extent of the change in the area. Based on our visit a few weeks ago, this is not a territory that had been heavily used by off-roaders. If this was a BLM-sanctioned event, I think the bureau should take a look at the damage that was done before allowing the group to hold another event on BLM land. If it was not a sanctioned event, then I would guess it should be a law-enforcement matter. Or perhaps that area is designated for ORV recreation? The area I'm talking about is about 12 miles east of Twenynine Palms, then south off Gold Crown Road, which connects with Old Dale Road. The encampment was in the Pinto Mountains about 6 or 7 miles south of Highway 62 and several miles northwest of the

Table C-2. Scoping Comments by Comment Category

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	national park boundary.
1294	Was wondering specifically which roads will be the topics at the Barstow meeting any are being considered for closure? I am an equestrian, and mainly ride on trails, but also on occasion need to ride roads to get to where I'm going, so there's some concern about possible closures. We're south of the Bighorn range, and east of Big Bear in the high desert.
Travel Management Area 4	
1004	I support the Jawbone store Plan to have trails for ATV and motorcycles maintained and expanded. Please give consideration to these off road vehicles and needed trail system.
1008	We also support the Jawbone Canyon Store Trail System
1018	Jawbone Canyon Store Trail System will help with a quality riding experience for above average riders
1032	I urge you to re-open these green sticker off-road routes to the mountains to once again restore the lost luster and relieve the punishment to our much needed everyday street vehicles, and to allow the traditional, adventurous, and challenging passageways we have long enjoyed on our way into the mountains from Jawbone Canyon.
1040	we Foxes wish to express our support for the Jawbone Canyon Store and their very rider friendly Trail System.
1049	Opening existing, but currently closed, trails in the Jawbone/Butterbredt/Dove Springs areas area and designating them as "Motorcycle Only" would provide a place for those who ride motorcycles without the concern of encountering large 4-wheel vehicles.
1050	Reopen the St. John's Ridge trail. Currently the only legal off-road route into the Piutes from Kelso Valley is by using using the Bright Star Wilderness corrider trail. Reopening the St. John's Ridge trail would provide a method creating a loop. Additional trails would need to be available to access the St. John's Ridge trailhead off of Kelso Valley Road from SC123.
1058	BLM should consider permanent closures around sensitive raptor habitat in the Jawbone-Butterbredt ACEC, especially around Robber's Roost. The current, temporary closures do not appear to deter people from visiting the area during the nesting season. Permanent closure of routes in the vicinity may prove more effective at protecting this habitat. BLM should also reevaluate routes in the Jawbone-Butterbredt ACEC for proximity to tortoise burrows. Several have been spotted, especially in the northern portion of the ACEC.
1061	Scott Spencer asked me to email the attached FINAL draft of the Jawbone Canyon Store Trail System Proposal Introduction pages dated April 6, 2012 to replace the previous introduction pages you received. This final version has been updated to emphasize crucial points of interest and applicable substantive comments about the proposal as well as the request to include this final draft of the document in the public record. Please note the addition of organizations signed-on in support of this proposal including Stewards of the Sequoia (Chris Horgan – Executive Director) and the Bakersfield Trailblazers (Richard Gauthier - President). The second attachment in this email contains the downloadable GPS tracks (Garmin Data Base) displayed in the proposal and specifically requested by Mr. Beck in a separate email. This email will be followed by the mailing of an additional complete paper copy of the proposal FINAL draft and two electronic copies (DVDs) that also contain the downloadable GPS tracks.
1065	This comment is with regard to the ongoing illegal ingress by motorcycles into the Burring Moscow Spring drainage. At present, OHVs converge into this sensitive area from Kelso Valley Road via at least three places and a fourth from Puite Mtn road near tunnel Spring. Restrictive signs and barriers are regularly destroyed and overrun to gain ingress. In my view legitimizing these trails into the Puite Mtns. is not the solution since usage would increase 10-fold and certainly bring a new illegal incursions. The Puite Mountains are a delicate and fragile ecosystem which over the past 10 years have suffered at least four major fires...It would be a seruios error in judgement if this illegal trail is sanctioned by the Bureau of Land Management for addition to the Western Mojave OHV Trail System.
1077	Yes I support recreation in Jawbone Cyn.! Do not close it. By doing so, you are removing freedom from our country.
1078	I support the Jawbone Canyon Store Trail System as the existing system does not work well with all residents
1099	I am writing you to express my wholehearted support for the addition of single-track and/or small vehicle trails as outlined in the “Jawbone Canyon Store Trail System”
1101	With regard specifically to the Middle Knob Subregion. all the checkerboard BLM parcels in the Tehachapi Mountains mustbe officially dosed. Native American artifacts and sites have been destroyed by illegal off-road vehicle riders in the general area known as "Bean Canyon". The Southern Tehachapi Mountains have suffered unnecessary and undue degradation as a result of relentless, unchecked dirt bike activity.

Table C-2. Scoping Comments by Comment Category

Document Number	Comment Text
1101	I enlisted the help of a colleague to help with the map information, and her response is pasted below. Also I attached a detailed map which includes BLM Middle Knob sections; this map should make it simple for you to understand the locations of the illegal OHV trespass, and how these neglected, unpatrolled parcels serve as a gateway to illegal dirt bike joyriding on the Pacific Crest Trail. The BLM parcels are peach colored and CalPortland Cement, which is a large private company, is colored in blue. You can compare this detailed map with BLM's Middle Knob map to view the sections with more clarity. There is not one BLM parcel that has not sustained breathtaking damage by off-road vehicles. An attached photo shows dirt bike damage (whoop-dee-doos) on the PCT in Section 2. Multiply this photo by 100 and you get a mental image of miles of Pacific Crest trail in the Middle Knob region and beyond. When you access the Google Earth map of Bean Canyon, you will be able to zoom into areas to view the Middle Knob area and the also the Pacific Crest Trail.
1101	The dirt bike damage to BLM in the photos you sent are on BLM from where dirt bikers ride up to the PCT just north from that photo….This area of destruction in particular is all in Township 10N, Range 14W, SBBM, and leads up into Township 11N, Range 14W, SBBM. This .kmz doesn't show Section numbers for Bean Canyon, but they are in the following Sections: (they can compare what they were sent and find the same area I've marked on the .kmz file that opens in Google Earth, that area seems to be changing a lot, but the hill-climbs are the same, they are quite obvious: Section 2= BLM with dirt bike destruction to Pacific Crest Trail. Section 4= Most is BLM, CP Cement & a few private property owners. Section 5= Calportland Section 8= BLM with dirt bike damage to resources. Sections 10=BLM with significant dirt bike damage to resources and PCT. Section 29= CalPortland Section 30= majority is BLM, with PCT damage by dirt bikes Section 31= CalPortland Section 32= majority is BLM, with OHV destruction throughout. Section 33= CalPortland
1102	i support the jawbone canyon store trail system.
1104	Map or Subregion Name and Number: Jawbone/Dove Springs/Butterbredt Comment: Existing dirt road/trail systems fail to provide a quality riding experience for small 4-wheel & 2-wheel riders that only single track and narrow track trails can bring. Groomed dirt roads attract large vehicles capable of high speed creating unsafe conditions.
1105	Map or Subregion Name and Number: Butterbredt Area Route #: Trail 28 What is the issue/concern/opportunity: The Opening of butterbredt Peak and surrounding/connecting trail system. Trail 28 has an extremely high valued trail traversing the best ridgeline terrain and viewpoints of the entire trail system.
1108	Opening public access to more public lands in the area of Jawbone Canyon. Please allow safer travel of smaller two-wheeled vehicles by opening and reopening access to single track trails in and around the area.
1136	Ever since Jawbone and the Friends of Jawbone started putting up fences, which were paid for out of the green sticker funds, I have stopped going there due to the danger factor of putting all users onto the same "roads". In order to promote a safe and enjoyable outdoor experience for everyone, adding existing narrow trails into the legal system seems like a no brainer. Less traffic, safer and varied experiences will add up to a logically better alternative that what is currently in place.....
1163	On Kelso Valley Road, Piute Mtn. Road, and St. John Ridge, there is a triangle of unauthorized routes.
1166	I support the Jawbone Canyon Store trail plan.
1166	Closure of trails and kid tracks by campsites. Reopening of single trails and use of kid tracks in camp. It would be great to have an all open area like Jawbone & Dove Springs, for the light green area on the Friends of Jawbone OHV map.
1171	We all support the Jawbone Canyon Stone Trail System
1175	Map or Number - Jawbone Canyon I support a trail system that links Jawbone Canyon with Red Rock Dove Springs area so to avoid the Dangerous wide fenced in dirt roads that the area is restricted to now.
1176	Map or Number - Jawbone/Dove Springs

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	More trails in the Jawbone/Dove Springs area re-open the 64 proposed trails provides a more scenic and safe riding opportunity for me and my family
1177	Map or Number - Jawbone/Dove Springs Please restore as much of the existing trail system within the limited use area as possible for safety as well as enjoyment.
1178	Map or Number - Jawbone/Dove Springs We support the Jawbone store trail system
1179	Map or Number - Jawbone/Dove Springs We support the Jawbone store trail system
1180	Map or Number - Jawbone/Dove Springs Keeping the area open to motorcycling. Est. some single-track trails that would be open to hikers, cyclists, and horseback.
1181	Map or Number - Jawbone/Dove Springs We support the Jawbone store trail system
1182	Map or Number - Jawbone/Dove Springs Open space is too small - Open more single track trails.
1183	I would like to see more single track in the Jawbone Area.
1185	We support the Jawbone Canyon Store Trail System
1186	We support the Jawbone Canyon Store Trail System
1187	Please remove fences blocking areas to trails in and around Jawwbone OHV area.
1189	we have compiled a comprehensive plan for Jawbone Canyon… [see attached maps]
1191	We support the Jawbone Canyon Store Trail System
1193	I think you should start opening the trails again, I support the Jawbone Canyon Store Trail System
1194	We support the Jawbone Canyon Store Trail System
1195	We support the Jawbone Canyon Store Trail System
1196	We support the Jawbone Canyon Store Trail System
1209	We support more trails in Jawbone
1210	I support more trails in Jawbone initiative
1216	I would like to support the Jawbone Store Trail System proposal
1217	I support the Jawbone Store Trail System proposal
1218	I support the Jawbone Store Trail System
1219	I support this trail plan for the Jawbone Canyon area
1223	I would like to see more singletrack re-opened
1224	I would like to see more trails open
1226	I support this trail system in the jawbone area
1228	open the closed trails
1229	open up more riding area
1230	I support Jawbone Canyon Store trail system - open trail
1231	I support jawbone cyn store trail system
1232	I am fully supportive of the jawbone stor trail system
1233	I support the jawbone store trail system
1234	I support the Jawbone Canyon Store Trail System.
1235	Please support jawbone canyon store trail system
1236	I support Jawbone Canyon Store Trail System
1241	Route # CC10 - Keep a good trail between Cal City and the Jawbone store. Fix the Railroad track crossing at CC10.
1243	We support the Jawbone Canyon Store Trail System
1244	We support the Jawbone Canyon Store Trail System
1245	We support the Jawbone Canyon Store Trail System
1246	We support the Jawbone Canyon Store Trail System
1248	Region: Jawbone Grid Location: 230328 no CN in T30SR36E Sec, 34 and 28 1220573 894314 Sec. 22 and 14 back into open area

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	Would like to keep open a very beautiful route from MK 66 to SC2 through Jawbone Wash. See attached map.
1256	Route should be open for access XB-70 memorial [Attached Map; Coolgardle]
1256	Map or Name - Middle Knob Map 1 Route # - MK13-MK15 Grid Location - Comment Type - Site Specific This route was missing on the 2001 WEMO survey. This single track connects MK15 with MK13 and is a trail that goes from the creek bottom to Sweetridge and supplies a loop to dead end routes. [Middle Knob Map 1 attached] In the 2002 WEMO survey, the motorcycles did not survey these routes. We would have added these routes to the inventory. This is a scrub pine plateau with rounded mounds, a couple of old mines and uphill trail ti the top of cross mtn.
1256	Map or Name - Middle Knob Map 1 Route # - MK57 Grid Location - Comment Type - Site Specific This route was missing on the 2001 WEMO survey. This is a heavily travelled road and organized events occur on it. 3 lateral trails allow access to the route from the valley floor. MK42, MK22, MK23L
Travel Management Area 5	
1001	Kramer Junction CN 133409, 132919, 133338, 135870, 134335, 135749, 135822 - routes not designated. Searchers request routes remain open for access to rockhounding areas.
1001	Calico Mountains Mule Mountain road - numerous opportunities for rockhounding along entire length, Searchers would like to keep or designate open for these opportunities. C 10224422,1024425,1024430,1024432,1024434,1024435, 1024482, 1024496, 1025222, 1025225, 1025228, 1025233, 1025234, 1025247, 1025346, 1025349, 1025354, 1025353, 1025354, 1025355, 1027221, 1027223, 1027226, I 119824, I 119842, 1119854, II 19857, I I 19880, I I 19885 - access to sagenite area. Serchers request routes be designated open for access to rockhounding area. CN 1350 156-7 - Searchers would like CM7606 is extended to CM7330 and opened for access to rockhounding areas. CN 1248587-8 - route to mine area - Searchers request this become an open route to allow access to rockhounding area. ObjectiD 1248604 - same CNI032149, 1032150, 1105436, 1105437, 1105441, 1024652 - CM7632 and CM7634 - AKA Tin Can alleySearchers request this remain open for access to rockhounding. Rock-crawling also occurs in this area. CN 1350 159 - Searchers request this become an open route for access to rockhounding. CN960784, 1033275, 1033279, 1033281, 1250157 - Searchers request that these routes be designated open for access to rockhounding areas. CN I034491 - CM7340 - Searchers request that this route remains open for rockhounding areas.
1001	Black Mountain/Black Canyon/Opal Mountain CN 1148133, 1148142 - Access to Opal Mountain rockhounding areas. Request to designate these roads as open. CN214093, 214286, 1148132, I 148134-8 - North of Black Mountain Wilderness - all undesignated routes (except for BM6265 and BM7153). Searchers request that these become designated open for access to rockhounding areas. ObjectlD (Crone5O Lake Subregion not completed at time of this comment) 1300966, 1316565-7, 1316569-70, 1316958, 1316997-9, 1332175-6, 1332181-200, and CN 1141681 (CL8315, CL8332) - roads running through unnamed hills provide access to rockhounding areas. Searchers request they be designated open for this access.
1001	Coyote Dry Lake CN I075926, 1075947-9, 1075984 (CM8103 and CM8111) - Searchers request these routes remain open for rock collecting. Would like 1075984 to become an extension ofCM8111 open all the way to the rock collecting area beside it.
1068	Map or Subregion Name and Number: Cronese Lake Subregion Route #'s: CR 8304, CR 8315, CR 8323, CR 8331, CR 8335, CR 8337, CR 8339, CR 8344, CR 8345, CR 8352, CR 8806, CR 8819, CR 8830, CR 8837, CR 8847, CR 8849 Route-Specific Comment: This is a request to keep the above named roads open to vehicle travel... in order to has access to the perimeter of the Cronese Proposed Wilderness area. This area provides the opportunity to view various types of desert flora and fauna and should be given access by way of existing BLM routes...to keep access open to stage for day hikes

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	into the proposed wilderness.
1073	Map or Subregion Name and Number: Cronese Lake Subregion Route#: C4039 What is the Issue/Concern/Opportunity: Parking for the walk to the Soda Mountain's Peak. Enclosed are photos from the peak for dramatic effect!! The WEMO plan shows C4039 closed near the Wilderness Study Area boundary at a point very near and in full view of the freeway. Allowing travel on the closed portion (Approx. 1300ft) would dramatically enhance the walk to the peak because the last portion tucks behind a small hill. Being out of view will create a better and much safer experience for hikers. Also, the entire mouth of the wash is already disturbed from roads and there are many mining trenches.
1148	Map: Black Mtn Detail Route #: BM 7154 Keep open - Unique 4 wheel drive loop
1255	This correspondence is to request retaining OPEN status in paleontological areas of areas managed by the Bureau of Land Management in the Western Mojave Planning Area (WMOA). Coolgardie Subregion: This includes the Mud Hills which have been a prime paleontological and geological resource for over 100 years, and continue to be important relative to the ongoing chronological data available (paleontological fossils, volcanic ashes, and paleomagnetic measurements).
1256	Wash should continue to route BM6370. Route BM 6362 should continue to route BM6383. No names on Routes like Bird Springs Wash or Hamburger Mill. These routes provide a loop that connects, other open routes. [Attached map; Black Mountain]
1264	Map or Subregion Name and Number: Cronese Lake Subregion Route#'s: CR 8304, CR8315, CR8323, CR 8331, CR 8335, CR 8337, CR 8339, CR 8334, .PR 8345, CR 835L,CR 88()~-CR-8819;eR 883tr,CR1383r,--eR-8847tCR 884a What is the Issue/Concern/Opportunity? The Palos Verdes Gem & Mineral Society is a non-profit california corporation who~ primary objective is the promotion of the study of gems, minerals, and fossils. We are a member of the california and American Federations of Gem and Mineral Societies. We enjoy exploring, photographing, and sometimes camping in the Mojave De~rt. Many of our members are Senior Citizens who enjoy the outdoors, but are not able to walk great dls~nces. Therefore, for many of us to experience the natural beauty of the Mojave De~rt, it is necessary to have 4WD access to certain areas. The Routes shown above are of Immediate concern to us. We have enjoyed 4WD trips to the~ areas in the past, and we hope that they can remain open.
1267	We are still waiting for more information about the status of route BM6362, but would like to the take the opportunity to officially submit a request that this route be closed during the route designation process if it is currently open. If the route is open, it wi II lead riders to trespass through a large parcel of private property specifically acquired and managed to provide habitat for multiple sensitive species. If the route is closed, we request that any signs along the route clearly indicate that it is closed.
1268	Map Name and Number - Thomas Guide GPS Map 349 Route# - Coolgarde Rd. Grid Location - Point of Interest - Comment Type - Site specific I use Copper City Rd. to Coolgarde Rd. to get my claim Red Dog.
1289	Specifically, we are aware of areas on Coolgardie Mesa and north of the Minneola Road Exit from Interstate 15 where unauthorized off-road vehicle use is degrading habitat.
1292	Here in the Tehachapi Mountains of Kern County, there has been a tremendous amount of effo rt expended to protect private property, businesses, and our nat ional heritage, the Pacific Crest Trail, from ongoing destruction by illegal off-road vehicles.Ground truthing expeditions of this area in question, along with perusal of maps, show that the checkerboard BLM parcels which are currently being savaged by rogue riders are within WEMO boundaries. There has been no protection of these parcels by BLM law enforcement personnel for a number of reasons, one of which

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	is largely due to the paucity of enforcement officers available. This is unfortunate, because these lands are a draw for illegal riders who joy ride on the Pacific Crest T rail and trespass onto private posted properties.
Travel Management Area 6	
1002	In 2010, numerous presumably unauthorized routes were noted on public lands encompassing Point of Rocks, specifically adjacent to the historic Mojave Trail. Significant erosion, vegetation and scenic value impacts were noted. In the adjacent Mojave Fishhook Cactus ACEC, not a single interpretive or open route sign, or fencing were detected. Extensive, recent unauthorized vehicle travel was noted throughout the ACEC.
1002	The BLM sensitive Barstow woolly sunflower (Eriophyllum mohavense) is also potentially at risk from vehicle use/parking and vehicle-based camping in the Fremont Subregion.
1002	A similar situation of uncontrolled vehicle use also occurs on MUC U public lands along the Bryman Bluffs south of Helendale, overlooking the Mojave River and abutting the southern edge of the Kramer Subregion. Both the threatened desert tortoise and Mohave ground squirrel are known to occur on these lands, which are highly visible from National Trails Highway. In 2010, numerous routes and vehicle play activities were noted on these public lands, along with extensive erosion, vegetation and scenic resource impacts.
1096	My main interest is in the Edwards Bowl region. My feeling is that if riders could not legally stage their vehicles at the Edwards Bowl, it would contribute to the preservation of the desert's natural values including habitat for the Desert Tortoise and Mojave Ground Squirrel, in addition to protecting the rights of neighboring residents to live free of the nuisance of offroad recreation behaviors.
1096	At one point I had a conversation with Barstow Field Office Chief Roxy Trost in which she suggested that the Edwards Bowl area might be "closed to camping". If the routes mentioned above are indeed left OPEN to OHV use, another way of dealing with the problem of scofflaw riders might be to invoke the "closed to camping" restriction so that riders could not stage there.
1144	My feeling is that if riders could not legally stage their vehicles at the Edwards Bowl, it would contribute to the preservation of the desert's natural values including habitat for the Desert Tortoise and Mojave Ground Squirrel, in addition to protecting the rights of neighboring residents to live free of the nuisance of off-road recreation behaviors... The routes which I refer to above are EM 2050 and EM2090. These are the only access routes into the Edwards Bowl from Buckthorn Canyon Road which is the principal thoroughfare crossing the area. On the WEMO maps made available to me these are shown as closed routes, but they are signed OPEN and riders habitually use these routes to enter and exit the Edwards Bowl area.
1163	El Mirage OHV area was created by joint efforts of two counts, BlM and the OHMVR Division. When the fencing was done, it was with understanding that we would have some gates for connectivity of existing routes outside the fenced areas. This has not been accomplished. Maps of the region need to be looked at and decided upon which designated route can accommodate a gate for the public to have a long distance experience, rather than have to get on El Mirage Road or go on to undesignated routes.
1251	THC manages its properties according to a specific charter and certain conservation easements held by California Department of Fish and Game (CA DFG), we are concerned about routes which may direct vehicle travel and associated activities to our private properties. CA DFG has a vested interest in protecting these properties in perpetuity as they funded the acquisition of the properties we own in the DWMA, as well as restoration and management of these properties we are undertaking now. While we recognize some routes on public lands occurring proximal to our properties may be necessary for our own access, as well as general public land access, we believe that vehicle use on many public land routes which do not end at our property boundaries may be detrimental to our properties.
1256	Fremont Peak and Gravel Hills are a major recreational area and should be set aside for that purpose…
1256	A-Unumbered route - bypasses Barstow Wooly Sunflower area from Kramer Junction to Harper Peak, B-Connect FP5324 to FP5261, C-Jeep Road, Cleaner route north to FP5261, D-Completes route from Harper Peak to Haburger Hill, E-Good reason why you need red closed signs. [Attached map; West Mojave]

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1256	Map or name - Iron Mountain Route#: IM6436, 64378, 6445 These routes used on dual sports events should be motorcycles only. To keep routes open for motorcycle dual sport events poute has previously been used for sanctioned dual sport events. [Iron Mtn. map attached]
1256	Map or name - Kramer Hills Map 1 Show these routes as "open" when they are actually motorcycle only. [attached map]
1256	Map or name - Kramer Hills Map 2 Show these routes as "open" when they are actually motorcycle only. [attached map]
Travel Management Area 7	
1001	South of Inyokern El Paso Mountains CN946377-79 - EP26 - Searchers request these remain open for access to rockhounding
1001	Castle Butte No C number - routes going through the section directly south of Castle Bune T32S R38E MDM, Section 34, and directly east, sec 26 are not designated but would be necessary to be open in order to access the Bune, which is in a private section in a checkerboard area.
1001	Last Chance Canyon CN9465 15,946519,947546,947547,947548,947551-3, 947555-7, 947618, 947620, 948436, 948437, 955732, 947622-4,954932,955733-4 - part of which is EP 15 - Searchers request routes remain open for access to rockhounding areas
1003	My concern is that the northwest section of EP499 is not only in an ACEC, but it is on top of a mesa with very high aesthetic values, very valuable resources and virtually no way of monitoring off route travel. I hike this area regularly and am disturbed by the proliferation of tire tracks off route. Additionally, at the eastern end of the mesa, where the route descends to the south towards EP30, the route is virtually non-existent, as there are no readily identifiable marks on the ground. I made this comment because I wish the WEMO subgroup and the BLM to consider closing the section of EP499 above EP101, as well as closing the eastern-most section of EP468 that goes up to the mesa
1005	The Spangler area should be expanded to include 'C' routes. There have been many losses to OHV opportunities around the state, including Christmas Canyon, Clear Creek, and the possibility of a diminishing of opportunities in Johnson Valley. To relieve the pressure and meet the need of the recreating public, the expansion of the Spangler OHV Area is sorely needed.
1005	Certain regions of the CDCA, but specifically the El Paso region should be designated as a ?Special Management OHV Area? and all trails managed as open to travel.
1005	There are two routes in the Rand mountains, R5 and R50 that had been closed due to compliance issues. Since those issues have now been fixed by extensive fencing, those routes should be reopened, and an educational process through signing, mapping and the release of information to the public needs to be adopted.
1016	Roads R5 and R50 which have been fenced to prevent inadvertent trespass in the Rands (the tortoise area) need to be designated open to vehicle travel. There is no longer any reason for them to remain closed.
1021	C routes area should be included to expand the Spangler area due to loss of Christmas canyon, and losses of Clear creak, JV and other possible losses due to wilderness re-designation
1021	R5 and R50 in the Rands should be re opened, they were closed due to compliance issues, those were fixed via fencing, there is no reason they should be closed, they are major connecting routes between Cal City, Randsburg, Spanglers and El Pasos, Those closures are putting too much traffic and pressure on routes such as R43
1027	The Spangler area should be expanded to include “C” routes. There have been many losses to OHV opportunities around the state, including Christmas Canyon, Clear Creek, and the possibility of a diminishing of opportunities in Johnson Valley. To relieve the pressure and meet the need of the recreating public, the expansion of the Spangler OHV Area is sorely needed.
1027	There are two routes in the Rand mountains, R5 and R50 that had been closed due to compliance issues. Since those issues have now been fixed by extensive fencing, those routes should be reopened, and an educational process through signing, mapping and the release of information to the public needs to be adopted.
1027	Certain regions of the CDCA, but specifically the El Paso region should be designated as a “Special

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	Management OHV Area" and all trails managed as open to travel.
1038	Upper Bonanza Gulch is where Hatfield the Rainmaker set up his camp. Many other historical sites are in Bonanza Gulch, (CB Jones' dug out shelter and CB Jones' shaft) along the road following the small tributary stream on the El Nino mining claim. This the same road which traverses the mesa from Mesa Springs to Bonanza Gulch and is used by equestrian endurance racers. This road is also necessary for me to access the far North east end of my claim.
1043	i am particularly interested in the roads which leda from EP0222 west ttword the mountain. These roads dead end at the foot of the mountain and are used for target practice with high power rifles. People used to set out chairs and tablesto shoot from. It was not practle to carry all this stuff in from from EP0222 to the shooting area. Now people will shoot from EP0222 which is not as safe.
1051	I hope these routes will remain open for the following reasons: The Joshua trees in the Coso range along the Cactus Flat Rd and routes SE 858, SE 756, etc. and down towards Haiwee Reservoir are abundant and wonderful to drive and hike through. The vista of the lake and alkaline hillsides we think are unique. Also the Cactus Flat area is usually quiet and expansive with few visitors making it a special area to experience by vehicle.
1051	EP101. This route today runs all the way up the hillside and back down on the eastern side to connect with EP 30. The WEMO map does not continue the route on the eastern side and we think it should as this is the easier way to take this route, from the east. The EP101 route passes near the spring, close enough for us to maintain the small cistern and plumbing with overflow for native animals which Walt put in years ago. The archeological site nearby consists of mutates and grinding areas off the current roadway by several hundred feet. EP 499 passes through Bonanza Gulch alongside several public cabins which are good shelters from the elements for overnight campers. The route today goes alongside the eastern side of Bonanza Gulch and up over the mesa, dropping down into EP30. This is a nice loop road which we've taken many times, with the views southwestward extending to Tehachapi. EP 15, EP 30, EP 100, EP 26, and the hill-climb routes such as EP 136, 195 and EP 194 are great for vistas. Goler narrows EP 146, Benson Gulch and Iron Canyon are great areas to 4wd. Hopefully most of the routes shown in blue for the El Pasos can be kept open
1058	BLM should keep the former West Rands ACEC closed to motorized used. This area is recovering from years of OHV abuse and should be allowed to continue to recover since it is critical tortoise habitat. Outside of the West Rands ACEC, the route network should stay the same or have fewer routes through areas that are suitable tortoise habitat. Especially in the West Rands ACEC, some of the routes have active tortoise burrows within 20 feet of them. Routes such as these should be reevaluated by qualified biologists as to their suitability for motorized recreation.
1067	My wife, Romelle, and I have been horseback riding in the El Paso sub region for the past 30 years. Many of these rides are group rides that have up to 12 other equestrians. Access is needed for vehicles to transport the horses, feed and water as well as places to camp.
1079	I am part owner along with about three other people on a gold claim in Bonanza Gulch. Our main access road is EP 15. I do not think this road or any other main access roads should be closed.
1080	please do not close EP 15, our main access road, not only do we prospect for gold but we also go to have fun and enjoy each others company. I have many fond memories of the times we have had there and would be terrible not to be able to go back anymore.
1089	El Paso region should be designated as "Special management" all existing trails, including single track should be managed as Open weather signed open or not.
1089	C routes area should be included to expand the Spangler area due to loss of Christmas canyon, and losses of Clear creak, JV and other possible losses due to wilderness re-designation.
1089	The Spangler open area should be expanded East of HWY 395, Down to RM1444 and the boundary area of Golden valley wilderness
1089	R5 and R50 in the Rands should be re opened, they were closed due to compliance issues, those were fixed via fencing, there is no reason they should be closed, they are major connecting routes between Cal City, Randsburg, Spanglers and El Pasos, Those closures are putting too much traffic and pressure on routes such as R43
1125	Map: El Paso Detail Map zone 34 and 35 Route #: EP0222 Grid Location: 35/34 Point of Interest: Hillside, 4 roads to old SP RR road bed Lack of accomodation for elderly shooters and hunters under the Americans with Disabilities Act by closing or blocking the (4) roads to this 60+ year well established shooting area
1128	Maps: Rands Detail Map 1

Table C-2. Scoping Comments by Comment Category

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	Allow a manageable single track trail system on the west side of the Rands that reduces illegal single track.
1128	Currently the trails that are numbered go up a canyon and get so steep that riders have to turn around. There is a need for mid slope trail that is above the 44 trail but below the 30 trail and runs mid slope parallel to the Rand Mountains
1129	Map: El Paso Detail Map zone 34 and 35 Route #: EP0222 Grid Location: 35/34 Point of Interest: Hillside, 4 roads to old SP RR road bed The Hillside supporting the SP Railroad track bed is an established target shooting and bird hunting area. Blocking the 4 roads leading to the hillside from EP0222 eliminating access to this area for shooters and hunters.
1129	Map: El Paso Detail Map zone 34 and 35 Route #: EP0222 Grid Location: 35/34 Point of Interest: Hillside, 4 roads to old SP RR road bed Many of the shooters are elderly, and carrying equipment to the sites against the hillside would be impossible and would be a hardship for seniors or anyone else. Closing the above mentioned existing access roads is a violation of the americans with disabilities act
1130	Map: Section 27, T 29S, R40E Mnt. Diablo Route #: R66 Grid Location: H-12 Closure of R-66 between R-110 and Goler Rd. R-66 goes through the middle of our current mining claims of which SBM has commercial placer mining operations. R-66 open is dangerous to OHVs, riders, offroaders, and SBM personnel. See attached maps. One quarter mile NE of R-66 is R-44. Riders/OHVs can traverse from R-110 to Goler Rd. via R-44. After closure of R-66 to the public, SBM will maintain and continue to use R-66 as we currently do.
1131	Map: El Paso Detail Map zone 34 and 35 Route #: EP0222 Grid Location: 35/34 Point of Interest: Hillside, 4 roads to old SP RR road bed The mountainside supporting the SP Railroad track bed is an established target shooting and bird hunting area. Block the 4 roads leading to the hillside from EP0222 eliminated access to this area for shooters and hunters...Road EP 0222 (and EP82) should lead to 4 existing roads that allow motorized vehicle access to the above mentioned hillside so that shooters can unload equipment such as benchrests, coolsers, chairs and target sun shades, clay pigeon...Block access to motor vehicles means that shooters must walk a distance of as much as a half mile to participate in this activity. Many of the shooters are elderly, and carrying equipment to the sites against the hillside would be impossible and would be a hardship for seniors or anyone else.
1133	El Paso Subregion. All of us use these roads to access the desert for taking pictures of wildlife, plants, as well as views of the desret. We go looking for rocks and minerals and use these roads to visit historical places too. Like Bickle Camp and the depression minning area. The Burro Schmidt Tunnel and more! These roads: EP45,15, & 40; Last Chance Canyon Road EP41, 45, 15, & 40; and Bonanza Gulch Road EP41, 45, & 30 are just 3 roads use often by many of us. PLEASE keep these roads in working order.
1145	Subregion: El Paso Point of Interest: Star Party Site Need access to site that has hosted public star parties since 1979. See attached Map.
1152	Route #: EP429, EP05, EP144, EP4 Grid Location: 14, 15, 22 I would like to keep these areas open because of family memories of the last 50 years
1157	There is an existing motorcycle trail going over Red Mt. connecting RM 108 to L ' RM 189. This trail was used by several motorcycle Enduros in the 70's. Due to the total lack of single track trails, this existing route should be designated Open to motorcycles. 2) There is an existing motorcycle trail that connects RM 104 to RM 1555. Due to the total lack of single track trails, this existing route should be designated Open

Table C-2. Scoping Comments by Comment Category

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	to motorcycles. 3) This route shows open on the original WEMO map and now that RM 4 is marked but dead ends in the mountains, users have started using this old road. Due to the total lack of single track trails, this existing route should be designated Open to motorcycles. 4) This is the main connector for full width vehicles coming north on RM 199 to get to RM1444. It should be designated open
1157	Map or Subregion Name and Number: EI Paso Map 1 What is the Issue/Concern/Opportunity? See attached map for locations. There is total lack of single track trails on BLM lands. Many miles of user developed single tracks now exist in the EI Paso Mts. All of these trails should be evaluated for potential designation as Open to Motorcycles on£]
1157	Map or Subregion Name and Number: Red Mt Map 2 What is the Issue/Concern/Opportunity? See attached map for locations. 1) This is an extension of RM 68 and is a main flat motorhome route to access camping areas south of Cuddyback Dry Lake_It parallels RM 273 and RM 32 which are old race courses with whoop-de-doos making them not passable by motorhomes. It should be designated open_]
1157	What is the Issue/Concern/Opportunity? See attached map for locations. 1) RC 3 should continue along the ridgeline, cross RC 8 and connect with RC 6f7. 2) There is a side hill single track between RC 16 and RC 27. Because of the total lack of designated single track this route should be designated open to motorcycles. 3) There is a trail in a canyon between RC 17 and RC 19 that is only passable to motorcycles. Because of the total lack of designated single track this route should be designated open to motorcycles
1163	1 am asking that this R50 and R5 be opened immediately as it is still fenced, there is no off route travel.
1163	I am also asking that the remaining trails inside of the West Rands be placed on special permit to be accessed on a very controlled basis with a required simple permit for guided tour or educational purposes. The trails in questions are R40, R15, R25, R35, R48, R13, and R37. R37: We no longer need to start from R43, that hill can remain closed. R35: Starts at RSO, and at the top of the hill joins R37; could be changed to R35 all the way out the gate and to Randsburg Mojave Road. R12: This could be started from R48 heading north and just before the fence on R43, and make a new loop trail back up to R35. All the rest should remain the same.
1247	Single Track desperately needed
1256	El Paso Map 1 Comment: Continuation of santioned dual sport event route (see Ridgecrest Map 1) El Paso Map 2 Comment: Continuation of santioned dual sport event route (see El Paso Map 1)
1256	Map or Name - Ridgecrest Map 1 Route # - Grid Location - Comment Type - Site Specific This is a route used by permitted dual sport events. This area should be returned to the open area to compensate for losing area to the xmas cyn. ACEC. [Ridgecrest map attached]
1256	Map or Name - Ridgecrest Map 2 Route # - Grid Location - Comment Type - Site Specific This is a route used by permitted dual sport events. A protion of the summits should be returned to open area. Suggest adding a competition crossing to the navy road. The summits were not returned after the intermin closure because it was thought it was 500 yards from a duma when it was 1.5 mi away. [Ridgecrest map attached]

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1256	Map or Name - Red Mountain 1 To make the transition from RM2313 to RM3102 smoother.
1262	I have an injury that limits my ability ro walk and am in support of an OHV trail system
1268	Map Name and Number - El Paso Range Thomas Guide Route# - E110 off Garlock Road Grid Location - Point of Interest - Comment Type - Site specific This claim belongs to prospector's club of S. CA and we are allowed to use it. I need to have access to E110 (Dirt) off Gartock Rd.
Travel Management Area 8	
1001	Stoddard Wells-Black Mountain C 147732,143458,148207,146390,147744,146540, 146541, 143869, 146501, 147316, 144079, 144250, 145682, 147685, 144391 - these are currently not designated routes. Searchers request that these be designated open to allow access for rockhounding.
1001	Lavic PC7618, 7621, 7615 - Searchers request these routes remain open to the 29 Palms Reserve fence.
1001	Hector CNIIII006 off the National Trail (Rt. 66) - Searchers request that this road become a designated open route for access to rockhounding areas. CNIIII121-2, 1111125-26, 1111134-36, 1111142-44, 1111146-Hector Hills-Searchers request these roads become designated open routes for access to the rockhounding along the pipelines. Some of this covers private lands, so signing would be needed to inform people of leaving BLM lands.
1001	Talc Mine West of Hector CN115013, 1164527, 1165334, 1173621, 1174568, 1174599, 1174602, 1174606, 1174621, 1174622, 1174689, 1174690-4,1174696-702,1174704-10,1174715-18, 1174721, 1174723-40, 1174742-47, 1174750, 1174763, 1174765-6, 1174769, 1174773-4, 1174776-79, 1174781-6, 1174788-9 - rockhounding area is threaded by these routes, some of which are designated open and some of which are not designated. The area is half owned by BLM (east) and halfby private (west) with a linle State land on the north. Searchers request that those routes that are not designated be so designated as open, and those already so designated to remain open. Signs will be needed to inform public when leaving BLM land.
1001	Granite Mountains Garnets CN 1127667 - comes up from Hwy 247 onto BLM land - requested to be designated open for access to rockhounding.
1012	While BLM is dealing with roads again – this is a good time to get Camprock Rd. designated under RS 2477.
1057	BLM should establish a route that connects the Stoddard Valley Open Area with the remaining open areas of Johnson Valley. This will allow "hare and hound" motorcycle races to continue in this part of the WEMO.
1134	Again, speed, removing B to V, and Stoddard to Johnson Valley Corridors route is again putting a complete bias tlgainst OHV, yet you will allow hunting, and dogs. How do they get in there?
1149	Subregion: Ord/Red Mtn/Newberry Ord Region starting to look like "open area" - washes trashed up - old camoflauged roads back in use - Need weekend ranger patrols - Paid for by mitigation/compensation from solar and wind projects etc. use Ord Rt. planning grant for monitoring and patrols. This is a DWMA/ACEC - not "open area"
1149	Obtain easements from private property owners through which a BLM "open" route traverses - Plus indemnification for routing OHVs onto private land.
1150	Point of Interest: Johnson Valley More and more of land owned by the people of th U.S. is being taken away...At Lone Wolf Colony we have the opportunity to see literally hundreds of families come through our facility getting water and then on the return trip come through to empty their waste tanks.
1259	We paid taxes, green sticker fees to ride up on the desert. Now,the Marines want to expand into Johnson Valley OHV

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	Area. Please keep the Marines from expanding into Johnson Valley... I go sometimes with the "RIMBENDERS" motor cycle club up Stoddard road. They are a family club and don't destroy the land up there. We the people need that land and treat it with respect. Keep that land open for us.
1268	Map Name and Number - Thomas Guide GPS Map 369 Route# - Hwy 247 to 8 Grid Location - Point of Interest - Comment Type - Site specific I use pipeline road SV183 off of 247 to 8 to access my claims that I do placer mining on.
Out of Scope	
1010	For these reasons, we respectfully request an additional scoping period of thirty (30) days beyond the 17th. of October 2011 be added to this process.
1012	BLM needs to recognize the liability of a BLM-designated road traversing private property - indemnifying said owners for any liability linked to such authorized public use.
1014	As i mentioned on the phone this morning, there is a new sign attached to the BLM Kiosk at the junction of Hiway 395 and RM30. The sign states that the area is open to cross country travel. Can you please bring this to the attention of the appropriate person.
1015	The BLM should extend the comment period to a total of 120 days.
1016	The single most important action the BLM could take today, to make this process better, is to fill the position of the Ridgecrest Field Office with a permanent manager and now that Roxie Trost is leaving, the Barstow Field Office manager position too. And finally, appoint someone who has knowledge of the CDPA and FLPMA to be in charge.
1016	BLM cannot possibly complete everything required by the court, by the date agreed to. BLM knows the process took over 15 years and it wasn't yet complete. The Society believes that BLM has boxed itself into a corner and will have to do another down and dirty designation of routes which will again be in court. The Society is concerned that some of those who brought the legal action which resulted in this exercise attended the "scoping/open houses in order to set up a future legal action. Each person and organization who/which brought the legal action which resulted in this exercise, participated in the 4 years of planning for the WEMO amendment. The Fish and Wildlife Service approved the WEMO and route designation was part of that amendment.
1016	We are concerned that shortly there will only be Mr. Stein and Dr. LePre who possess any historical knowledge of what has taken place in the CDCA and during the 4 years of the WEMO amendment plan. This failure on the part of BLM to retain the people who have this knowledge has resulted in more legal actions by people and organizations who/which rely on this absence to win their points. The Society believes the BLM documentation exists, but the people with historic knowledge are gone.
1017	The BLM should complete a new Federal Register notice and extend the scoping comment period to a total of 120 days.
1022	In addition to the economic impacts on the local and regional communities, the Proposed Action must analyze and disclose the cost of the proposed action, including the ongoing, perpetual costs of the proposed renewable energy projects.
1024	The comment period is too brief for the public to have an adequate response. The time needs to be extended.
1028	Additionally we request that an adequate number of agency staff be licensed and safety trained to operate OHVs, have an adequate number of OHVs for their use and spend an adequate amount of time riding OHVs along with OHV recreationists so that they can adequately understand the needs associated with motorized access and motorized recreationists.
1046	4) Target Shooting needs to be managed: The Juniper Sub Region is a "shotgun" only area, but there is an increase in target shooting with weapons other than shot-gun, in inappropriate areas and shooting at inappropriate targets. Target shooting desert-wide is becoming more of a threat to other users. Target shooting areas are often in places where people access the hilly terrain for hiking or horseback riding (a box canyon). Target shooting also occurs regularly in Riparian areas. Areas often used for target shooting become dumping

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	grounds for all types of trash including couches, refrigerators televisions etc.
1071	Unlicensed kids on ORV's are not a problem on the combined use highways/roads, as long as they have had training and are supervised by a proper adult. (This also should be specified in the WEMO plan, and in local signage)
1081	The WEMO Vehicle Management Plan affects public lands two BLM Field Offices: the Barstow Office and the Ridgecrest Office. BLM is actively seeking the public's participation in the route designation plan amendment process without a permanent Field Office Manager in either of the BLM administrative offices. The public, and elected officials are relying on BLM management and staff to provide guidance and direction regarding this important CDCA plan amendment.
1087	As such, a request of 120 days extension is asked for.
1100	BLM has confused the public as to the correct date on which the scoping comment period ends. The notice in the Federal Register states the end date as October 13, 2011. At the public meeting in Ridgecrest it was announced that the ending date was October 17, 2011. The BLM should complete a new Federal Register notice and extend the scoping comment period to a total of 120 days.
1100	BLM has to accept that the implementation of whatever plan emerges, has to be shared by and with public partners. BLM has neither the money nor the manpower to implement whatever is finally accepted by the court.
1124	Landowners paying for maintenance and green stickers using illegally, All routes should be street legal. Owner signing and ____ all green stickers in green sticker areas parking staging identified
1126	extend the April 15th date
1127	In addition to the previously stated, general land management concern, I would also like to specifically address the issue of unmarked abandoned mines. If possbile , I would like the BLM to increas public awareness of abandoned mines and any potential hazards that they may present.
1134	No financial plans have been made to understand how this is all going to be paid for. Does the BLM plan on taxing all the Cities and Counties to implement this plan?
1142	I request a 2 month extension.
1151	Offering services of SNEL(biological Consulting Service) to do surveys / inventories of sensitive species in areas of Route designation
1159	We should not creat defacto wilderness areas
1164	How do we get an extension of the 10/13 comment period. With all these reference you are giving how on earth can we possibly get to the bottom and give you good comments? I think we should extend the time what do I have to do, Make formal request to who?
1263	As a member of the Palo Verdes Gem and Mineral Society, I am concerned about the proposal made by senator Feinstein to deny acess to 1,000,000 plus acres of the Mojave Desert (act of 2011).
1266	As a member of the Palos Verdes Gem and Mineral Society I am concerned ...about the proposal made by Senator Feinstein to deny access to 1,000,000 plus acres of the beautiful Mojave Desert.
1272	I don't see how closure enforcement could be convened under current and future budget cuts.
1287	BLM must recognize that the implementation of whatever plan emerges will require the involvement of public partners such as rockhounds and other recreational users. BLM has neither the money nor the manpower to successfully implement whatever is finally accepted by the court without such participation.
1291	I am also challenging the validity of inclusion of the Viscera Springs area in a Wilderness Area as defined by the Wilderness Act of 1964 (Attachment 3) and the Desert Protection Act of 1994 (Attachment 4). This area does not meet the requirements for designation as a "Wilderness Area". The Wilderness Act of 1964 states that the area shall be "Untrammeled By Man. It is also stated in the Desert Protection Act of 1994 that the areas shall be "Essentially Unaltered By Mans Activities". The area around Viscera Springs does not come close to meeting those definitions, and the area has many established roads, cabins, mines, manmade water sources and so on.
1296	Wildlife: Several years ago CDFG and volunteers reintroduced 110 Bighorn Sheep into the Whipple Mountains. BLM has failed to keep its commitment to control burro populations in this Mountain Range. If we are lucky we may have 10 Bighorn left. There needs to be a seriously major burro gather in the Whipple Mountains. The BLM should schedule regular gathers in areas where conflicts exist between burros and Bighorn.
1296	Wildlife: The Society for the Protection and Care of Wildlife's Water for Wildlife Committee does projects on its own and partners with other groups which also do water projects. In the Ridgecrest Field Office there is a MAJOR problem. Quail Unlimited holds the CDFG authorization to maintain all the guzzlers and tanks in the area. They have the letter which makes them the CDFG agent for maintaining, repair and when necessary carrying water to all guzzlers and tanks. The

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	California Desert Protection Act (CDPA) authorizes vehicle access in wilderness to do any or all of those activities and authorizes and appoints the CDFG as the sole arbiter of these activities. (This was one of the coalition's amendments which I helped author and which became part of the CDPA.) The Ridgecrest Wilderness person who seems to hate supplemental water sources is attempting to get around the California Desert Protection Act language by now saying that she has to approve a CDFG proposal which CDFG must prepare and submit to her and which justifies not only the work to be done but the very existence of the guzzler or tank.
1297	Many of the route designations in the wilderness that were protected by the 1994 Desert Act and the Wilderness Act for preserving guzzlers are being actively and willfully closed without legal discussion from the public in the Ridgecrest area. Quail Unlimited holds the CDFG authorization to maintain all the guzzlers and tanks in the area. They have the letter, which makes them the CDFG agent for maintaining the guzzlers.

Note: Some comment text was converted directly from PDF versions of comment documents and may have resulted in minor formatting or content differences.