

Sept. 4, 2003 101

Dear Sir:

I am a member of CA4WDC. I am commenting on the WEMO plan.

It seems the only thing that is truly endangered is HUMANITY.

You have closed thousands of acres to protect the desert tortoise. Only a few hundred miles to San Vegas Nevada in their habitat the desert tortoise is over populated & they are trying to figure out what to do. Why not transfer them to Calif. desert so they can be endangered instead of over populated.

You closed Coyote Canyon for the sheep & desert ~~was~~ <sup>is</sup> bird now they are gone, but the 30-40 horses were a problem. Where do you folks come up with the money & absurd ideas on how to manage land & species?

Now the Pearson milkvetch weed in Glamis is dying out because ~~the~~ aren't spreading the seed.

Let Mother Nature take care of nature. You take more time with human beings. Mike Hardy  
CA4WDC  
247RS.

Date 9/2/03

Name JOHN A. GIOVANNI  
BATRICIA DECKER

Address P.O. BOX 431, 100 MARUK AVE  
HAGAMAN, N.Y 12080

Mr. Bill Haigh, Project Director  
West Mojave Plan  
Dept of Int. BLM  
22835 Calle San Juan de los Lagos  
Moreno Valley, CA 92550

Dear Mr. Haigh,

As a private landowner in the area covered by the proposed West Mojave Plan, I would like to offer the following comments.

Our desert lands in the El Mirage Valley are within the area included in the Habitat Conservation Plan aimed at protecting the desert tortoise, Mojave Ground Squirrel and a number of other rare plants and animals. Our lands lie within the proposed Desert Wildlife Management Area where surface disturbance will be held to 1% over the next 30 years. We realize that under the plan we will have to pay a five-to-one mitigation fee at the time of any development on our private lands. We further realize that no power corridors nor water districts or other civic improvements will be allowed under the plan.

Our desert lands have value now mainly as possible homesites to people who desire a rural setting in a quiet natural area and are willing to make the necessary sacrifices needed to live in a parched area with no available power or water.

After much study of the proposal and drawing on the many sources of information regarding the historical uses and management of the lands in our area, we conclude that the major threat both to the rare species and to our interests as landowners is the continued degradation of public and private lands by motorized recreational vehicle riders.

As a landowner I am concerned that unlicensed "green sticker" vehicles will continue to be allowed in my area. With the enactment of the El Mirage Plan in 1990, we were told that BLM would control the illegal proliferation of routes and the concomitant nuisance, safety hazards and environmental damage.

There are two main sources of the continued trail proliferation. One is the migration of Off-Highway Vehicle (OHV) riders north from the El Mirage OHV Park area. The other is the continued use of the Edwards Bowl area as an OHV staging area where riders unload their green sticker vehicles and, due to lack of adequate BLM enforcement presence, proceed to ride over all adjacent public and private lands with no regard to the posted rules.

The problem with the "green sticker" vehicles is that there is no way to document their illegal acts by photo or other forms of witnessing, because there are no identifying markings on the vehicles that can be seen from any distance..

I recommend that:

1. All lands in the El Mirage Valley DWMA be limited to street-legal vehicles only--Alternative D.

Kevin Helfend  
24485 Valle Del Oro 103  
Newhall Ca  
91321

To Whom It May Concern:

My name is Kevin Helfend and I am an out door enthusiast. I enjoy motorcycle riding and racing, hunting, fishing, and exploring the desert in my 4x4. I love the desert and I consider myself to be a steward of our public lands. I am writing this letter today to bring up areas of concern about the proposed WEMO plans.

I was troubled that there were no public meetings held in the Greater L.A. area. There are a lot of people who use the desert and who live here. I live in Newhall and commute to Beverly Hills to work. I could not make any of the meetings in the desert. Please consider adding two or more meetings in the Greater L.A. Basin so the public can be heard. I would also like to ask that the comment period be extended. 90 days is not enough time for me to go over every document in the proposed plan.

WEMO is concerned about the desert tortoise and I am also. Things have to be done about the exploding raven population. I have been going to the desert for a long time and I am seeing more ravens than ever. They are not a native specie and they are doing a lot of harm to the Juvenal tortoises. I propose a bounty for the ravens. Wholesale shooting could take place at the Mojave Land Fill to reduce the raven population. The Mojave Land Fill is very close to the Rand Mountains and Freemont Valley area; an area that has a sizeable tortoise population. Please consider starting a captive breeding program for the desert tortoise.

I would like to see all routes open unless signed closed. I think this is common sense. While I am on this topic I would like to bring up the issue of fences. Fences are a good thing for private property owners. They have a purpose. Fences on public land are a waste of money in my opinion. They cost millions of dollars to build and maintain. They also give the ravens another place to take a break and scope out their next baby tortoise meal.

I would like to see the Johnson to Parker, Johnson to Stoddard and Barstow to Vegas corridors considered open for competition. Point to point races are a tradition in the desert. These corridors would only be used a few times a year. It would not cause any harm to the environment.

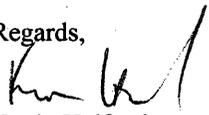
Please reopen the "C" routes in the Spangler Hills open area. We can only have races in the "open areas" and with out the sand hills the area is very small. We end up using the same trails over and over again. I would love use the "Invader Down Hill" in a competition again. I would also like to see a "C" route system established in the Cinnamon Hills area just east of Anderson Dry Lake.

The BLM did not do a complete survey of all twenty three sub regions. Only eleven were surveyed. I think a complete survey needs to be done so we can have an accurate inventory of all of the roads and trails that fall in the West Mojave.

The Motorcycle Industry estimates that OHVs contribute over 6 billion dollars to the states economy. I am sure you are aware that California needs every penny that it can get.

In closing I would just like to state that having an open desert is a good thing. I have grown up in the desert. It brings families closer together. It gives city people like my self a break from the busy city life. I would hate to see the public locked out of its own land. Please ad my name to the BLM mailing list. I want to be informed about future issues in the desert

Regards,



Kevin Helfend

To whom it may concern  
West Mojave Plan

August 21, 2003  
Stephen D. Yarber  
15666 Rolling Ridge Dr.  
Chino Hills, California 91709

As an avid user of public lands for recreational purposes I would like to express some concerns about the West Mojave Plan.

Over the years I have used the public lands for camping, hiking & motorcycling independently and with the American Motorcyclist Association / District 37 in organized events. Access and use is getting more and more difficult as more administration and regulations are applied to the public lands that are shrinking.

I agree with the District 37's comments and want to support their efforts. The only reason I know of the West Mojave Plan is through the AMA / District 37. I feel more notice needs to be given to the public on matters like this and would like to see the deadline moved ninety days or more with more effort put towards informing the public of this action.

I would be opposed to any additional closures of public lands. The desert tortoise recovery program seems to be the focus of purposed closures, which I would be against. I would rather see efforts be directed toward using the areas of wilderness already established rather than restricting or closing more of the recreational lands to solve the tortoise recovery efforts.

More fencing of the public lands is not a project I approve of. A reported \$17,000,000.00 cost for this would be better used to help inform and educate the public using the lands in the care of the desert. A slogan used for years in the District 37 "Leave the desert cleaner than you found it" has become a way-of- life for me. Making the lands more difficult to access is not in the spirit of open recreational areas. If these are open areas to the public where does the need to fence it come in?

The fencing at El Mirage is making it more difficult to use the corridor that connects to the Randsburg area and I hear access to the route may be closed soon. I would like to see the corridors (Johnson to Parker, Johnson to Stoddard, Spangler to Fremont, El Mirage to Fremont, Barstow to Vegas) and the 'C' routes open to allow for use by the public and organized events. The reported 6 billion dollar annual contribution to the California economy from the motorcycle industry represents thousands of citizens having a desire to use these lands congress set aside for them.

It seems that the route closures need to be reviewed and adjusted to better accommodate the users. Signage should not be over used in order to keep the expense down and keep the lands clear of unneeded obstacles. If an area is closed post it, if it is open there should be no need to post that.

The organized activities should not be restricted and regulated so heavily, the event sponsors working with the government officials do a great job policing the participants. The event sponsors on open lands should dictate things like speed limits. The general public seems to me to be the ones that need the education and information on safety while on open lands.

Please include me on your mailing list.

Sincerely



Stephen D. Yarber

**Patrick Johansen**

14925 Mansel Ave  
Lawndale, Ca 90260  
310-675-0712

BLM  
West Mojave Plan  
22835 Calle San Juan de Los Lagos  
Moreno Valley, CA 92553

Gentlemen,

I am a member of the California Association of Four Wheel Drive Clubs, Inc. and am writing you in regards to the Draft Environmental Impact Statement for the West Mojave (WEMO) Plan. I support Alternative G – NO ACTION but with the some modifications. I have listed those modifications below:

1. Start a Species Conservation Measures with respect to tortoise disease and predator control as discussed in Alternative F
2. Complete the inadequate route inventory and analysis prior to designating any routes as closed
3. Make the "Open unless posted closed" policy consistent throughout

The tortoise plans being used are scientifically incorrect and obsolete. It is a known fact that predators and respiratory disease kill the majority of the tortoises.

Some CA4WDC members have mapped the areas in this plan and indicate that the route inventory is incomplete. These routes should have been surveyed by the BLM, to make sure the information was correct and not by using maps based on the 85-85' route designation.

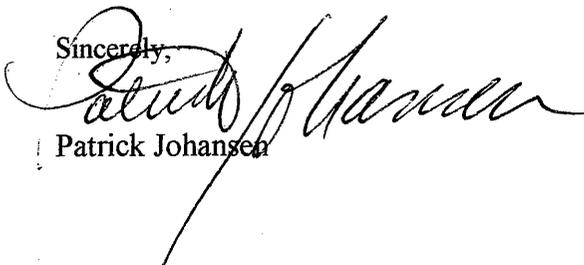
The review period for this draft is way too short due to the large area that needs route verification. The comment period should be at a cooler time of the year, temperatures in the area during the present comment period are in excess of 100 degrees and it is difficult if not unsafe to map these areas during this time.

There are wildlife water sources that will not longer be maintainable, as well as many historical, mining, and archeological areas that can no longer be accessed.

The "closed unless posted open" policy is a really bad policy. This would be extremely confusing as nothing has been like this in the past and most other areas work under a "open unless posted closed" policy. The "closed unless posted open" policy would make it extremely difficult for land users to be clear as to where they could go. I imagine it would lead to many civil rights law suits as unclear policy.

Therefore I recommend Alternative F because of the Draft EIS discrepancies in route designation and lack of a complete inventory of those routes, obsolete tortoise plans, and I am requesting that the "OPEN unless posted close" policy continue to be practiced. Please, place my name and address on any future notices on this process.

Sincerely,



Patrick Johansen

Date 9-4-03

Ph 714-897-6711

Name LOW CONNOT

Address 5242 YALE AVE

WESTMINSTER, CA 92683

Mr. Bill Haigh, Project Director  
West Mojave Plan  
Dept of Int. BLM  
22835 Calle San Juan de los Lagos  
Moreno Valley, CA 92550

Dear Mr. Haigh,

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Our desert lands in the El Mirage Valley are within the area included in the Habitat Conservation Plan aimed at protecting the desert tortoise, Mojave Ground Squirrel and a number of other rare plants and animals. Our lands lie within the proposed Desert Wildlife Management Area where surface disturbance will be held to 1% over the next 30 years. We realize that under the plan we will have to pay a five-to-one mitigation fee at the time of any development on our private lands. We further realize that no power corridors nor water districts or other civic improvements will be allowed under the plan.

Our desert lands have value now mainly as possible homesites to people who desire a rural setting in a quiet natural area and are willing to make the necessary sacrifices needed to live in a parched area with no available power or water.

After much study of the proposal and drawing on the many sources of information regarding the historical uses and management of the lands in our area, we conclude that the major threat both to the rare species and to our interests as landowners is the continued degradation of public and private lands by motorized recreational vehicle riders.

As a landowner I am concerned that unlicensed "green sticker" vehicles will continue to be allowed in my area. With the enactment of the El Mirage Plan in 1990, we were told that BLM would control the illegal proliferation of routes and the concomitant nuisance, safety hazards and environmental damage.

There are two main sources of the continued trail proliferation. One is the migration of Off-Highway Vehicle (OHV) riders north from the El Mirage OHV Park area. The other is the continued use of the Edwards Bowl area as an OHV staging area where riders unload their green sticker vehicles and, due to lack of adequate BLM enforcement presence, proceed to ride over all adjacent public and private lands with no regard to the posted rules.

The problem with the "green sticker" vehicles is that there is no way to document their illegal acts by photo or other forms of witnessing, because there are no identifying markings on the vehicles that can be seen from any distance..

I recommend that:

1. All lands in the El Mirage Valley DWMA be limited to street-legal vehicles only--Alternative D.

2. Use the "Closed unless marked Open" policy of signing routes.
3. Closed routes need to be restored, signed as "closed" and patrolled by BLM law enforcement personnel.
4. If non-compliance with the closures cannot be eliminated over a reasonable time frame, a larger area must be closed by BLM to the type of vehicle generating the non-compliance.
5. No routes should be designated across private lands, including "de facto" routes that are Open on two sides of a private section without the permission of the owners.
6. Enforce the El Mirage Plan. Routes are improperly designated and signed into the "zone of influence" inviting motorized trespass into lands not available for riding under the El Mirage Plan.
7. Close the Edwards Bowl to motorized vehicles of all kinds. This area will never be rehabilitated without a complete respite from motorized use. It has above-average tortoise sign.
8. I support the No Action Alternative G that uses the route network designated by BLM in 1987.

Thank you for the opportunity to comment on the West Mojave Plan. Please use this historic opportunity to protect the desert for future generations.

Sincerely,

*Jan Connot*

P.S. Please Be Concerned ABOUT THE  
FUTURE OF OUR LAND.  
Protect OUR ENVIRONMENT. RESTORE  
THE GROWTH OF PLANTS & ANIMALS  
THAT ARE OUR PRIDE & JOY.

9-4-03

MY NAME IS Lou CONNOT  
my address is 5042 YALE  
Ave, Westminster, CA 92683  
my phone # is 714 897-6711  
my PARCEL Description  
is The  $5\frac{1}{2}$  OF  $3\frac{1}{2}$  OF  
 $W\frac{1}{2}$  OF THE  $SE\frac{1}{4}$  OF  
SEC. #5 TWP 8N R7W SBCO.  
PARCEL # is 04622371340000

I SUPPORT THE WEST MOJAVE  
PLAN. ENFORCE THE EL MIRAGE  
PLAN.

We need our RIGHTS AS HOME  
& LAND OWNERS TO HAVE OUR  
PROPERTY PROTECTED FROM  
ILLEGAL users & TRESPASSERS  
PLEASE NO DEGRADATION OF OUR  
LANDS BY UNAUTHORIZED OHV'S  
AS AN OWNER THERE SINCE 1972  
I HAVE BECOME ATTACHED TO MY LAND.

Sept. 4, 2003

Billy M. Sims  
6402 Walt Street  
Westminster, CA. 92682

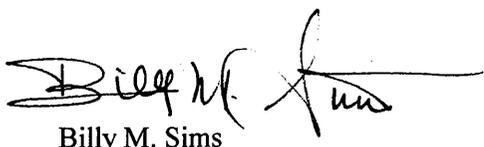
BLM  
West Mojave Plan  
22835 Calle San Juan de Los Lagos  
Moreno Valley, CA 92553

To whom it may concern

I am writing to you because, as a concerned OHV user, and about the West Mojave Plan, and as a member of CA4WDC, I feel that you plan does not give proper consideration to the following issues:

- Obsolete Desert Tortoise Plans
- No factual basis for conclusions & management decisions
- Closures based on 85-87' route designation w/o survey (about 50%)
- Burden on public to justify openings; too large to be effective; review time too short
- Closures - based on species; OHV/ recreation targeted
- Bad science > Route designation - Limited routes protection of access
- BLM- no \$\$ to implement plans; need to determine source of funding and who is implementing route designation - not taken into account
- Historical/ photo/archeological use; wildlife water sources
- Inadequate inventory of existing roads and trails
- Duplicate routes not maintained
- Cumulative impacts of closures
- Data from scoping meetings included? If not, state why?
- Closed unless marked open; USFS El Dorado lawsuit
- DWMA definitions out of hand
- Organized, non-competitive events; permit process needed (no EA)
- Cost recovery program not defined; no ceiling
- Inclusion of "species of concern" DT recovery plan umbrella
- RS2477
- Consideration of mining act
- Limited range of alternatives
- Need provisions for competitive events and race corridors (C routes)

The public lands of this State as well as this National as a whole should benefit all its potential users and not just to the benefit of a few. The closer of, or the unreasonable restriction of the PUBLIC LANDS is a crime against all the citizen of this national.



Billy M. Sims

To Whom It May Concern

I would like to know why you chose to ignore your findings in a 1972 study on the desert by Road Engineers and Scientist, that OFFROADERS WERE "INSIGNIFICANT" in the erosion and damage to the desert? Wind and water were the major factors.

You ignore the fact that the surface of the Earth is in a constant state of change. You act as though nothing is going to ever happen, and that it will be this way forever.

You keep preaching that this is a very delicate ECO-system. As I've lived in this desert for over 46 years, I can tell you that that is complete "Bullshit," from personal experience.

You promised us that you would give us back the Bristow to Vegas Race?? Why does the word Lie come to mind!!

I want to know why that you do NOT open the "C" Routes to competition as you said you would (there is that word again Lie)

What about all those millions and millions of Acres that are closed to us and most of the public.

If you can close down land that "you said" we could ride on.

Why can't we get routes back through these closed areas as part of your Big Bio Diversity Plan. As humans aren't we part of the Bio System??

Why don't you also REOPEN THE FREEMONT RECREATION AREA, AND CONNECT FREEMONT REC. AREA TO THE SPANGLERS + EMIRAGE AREAS. AND ESTABLISH "C" ROUTES IN THE CINNAMON HILLS AS DESCRIBED IN ACT. "E"

While you are figuring all this out, take a minute and look up the words, Truth and Honesty. This may help you in your job

Thank-you  
GARY CAMPBELL  
13707 E. AUR G-6  
LANCASTER, CA. 93535

Sept 3, 03 109

## Comments on West Mojave Plan

I have attended many sloppy meetings + 2 connect meetings - Palmdale + Barstow.

I believe the connect period + meetings should be extended + meetings closer to the users of the desert would bring more people.

Of the many surveys + studies made - Why wasn't it found out that the majority of recreationists are not locals - locals are of course important. But meetings were too far for many.

Why not target industry + sales people of recreation equipment for more involvement. Makers of vehicles, trailers, horse, hiking, biking etc. need to know this affects them.

Do what is necessary to dispatch rangers - Season - ~~them~~ no season - They are over regulated trouble causers - trash, tortois etc.

We desert people ~~to~~ in general - love the  
turtles, flowers, animals etc. scenery + all.

Let us be a part of - not apart - from  
patroling + being responsible for our actions.

Less fencing - more self policing of our peers.

Routes are open unless signed closed

Either complete the surveys + gather all  
info or don't make a decision on partial routes  
~~to~~ surveys

Johnson to Parker + Johnson to Stoddard race  
corridors to be used for competitive events - language  
should ~~be~~ be clear on this

All interim closures to appear CBD  
lawsuits to be lifted at this signing

~~Rep~~ ~~Rep~~ Reopen C routes in Spanglers  
+ Cinnamon Hills

Please don't consider the public  
guilty + close routes until prove innocent

This goes against the law of the land

Let the ~~public~~ sue happy parties  
prove us wrong instead of penalizing us  
cause they threaten to sue.

I have been using the desert + BLM  
lands to ride, hunt + just look  
+ enjoy for 38 years. I pick up  
trash, correct on wrong-does and am  
a responsible long-time user. Don't rush  
this to satisfy a few w/ money + penalize  
the masses that use, respect + take care  
of it

THANKS

Member D-37  
Checker MIC.

Alan Peppel  
2705 Juniper Dr  
Palmdale, Calif 93550

(61) 724-1723

Aug. 30, 2003

To Whom It May Concern,

My name is Kyle Rauen. I have been going out to the desert with my family for many years. It is fun. Why are you taking this away from me.

I am concerned with a number of issues with The West Mojave Plan.. First of all, the time factor is too short. Being only 90 days, it is impossible for me and the rest of the public to respond and absorb such a large document. **There should be an extension.** Secondly, there was no meetings in the L. A. Basin where a great many fellow desert enthusiast reside. **There should be at least two more meetings to inform the public of the proposed closures.** I also support Alt. E, adding only one large DWMA. I would also like to put on the BLM mailing list, in order to be up to date on this issue.

*Kyle A. Rauen*  
6560 N. Longmont Ave.  
San Gabriel, Ca. 91775

111

Date Sept

Name Genevieve Robinson Doughty

Address Box 7698

Moore, Oklahoma  
43153

Mr. Bill Haigh, Project Director  
West Mojave Plan  
Dept of Int. BLM  
22835 Calle San Juan de los Lagos  
Moreno Valley, CA 92550

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8. I support the No Action Alternative G that uses the route network designated by BLM in 1987.

Thank you for the opportunity to comment on the West Mojave Plan. Please use this historic opportunity to protect the desert for future generations.

Sincerely,

GENEVIEVE JOHNSON DOUGHTY

BOX 7698

MOORE OKLA 73153

MR BILL HAIGH, PROJECT DIRECTOR WEST MOJAVE PLAN

I am a retired science teacher of 21 years. I am very aware of the HABITAT CONSERVATION PLAN. My land lie with in the proposed DESERT WILDLIFE MANAGEMENT AREA.

MR HAIGH facts to consider;

The importance of the desert and significance of the friability of this land. The CONSEQUENCE from disturbance of this land IS ONCE DESTROY CAN NOT RETURN wildlife or plant life to the area. Our children should be able to experience the

beautiful raw desert and able to live on this land like their

grandfather. OFF HIGHWAY VEHICLE MUST BE STOP ON THIS FRAILTY

LAND NOW. I am sending you a signed letter written by DOUG

PARHAM. I agree with his recommendation .

GENEVIEVE JOHNSON DOUGHTY

**Andrew Hammitt**

3314 W 182<sup>nd</sup> Place,  
Torrance, CA 90504

112

9/04/2003

BLM  
West Mojave Plan  
22835 Calle San Juan de Los Lagos  
Moreno Valley, CA 92553

Dear Sirs,

I am writing you in regards to the West Mojave (WEMO) Plan. I am a member of the California Association of Four Wheel Drive Clubs, Inc. and The Roughwheelers IV Wheel Drive club. I have concerns about the Draft Environmental Impact Statement. I support Alternative G – **NO ACTION** with the some modifications. I have listed those modifications below:

- Make the "Open unless posted closed" policy consistent throughout
- Start a Species Conservation Measures with respect to tortoise disease and predator control as discussed in Alternative F
- Complete the inadequate route inventory and analysis prior to designating any routes as closed

The tortoise plans that are being used are obsolete. They are, also, based on bad science. It is a known fact that predators and respiratory disease kill the majority of the tortoises

There are many people of CA4WDC that have gone and mapped many of the areas in this plan. It is my understanding that they have found and documented that the route inventory is incomplete. It should not be up to the public to have to do the work that should have been done by the BLM. Routes should have been survey on the ground, not by using maps based on the 85-85' route designation.

In addition, the review period for this draft is way too short considering the huge area that needs to be looked at to make sure that all the routes are included. And the comment period always seems to be during the hottest time in the desert. When temperatures are in excess of 100 degrees and it is unsafe to go out a map these areas.

There are many historical, mining, and archeological areas that can no longer be accessed. There are, also, wildlife water sources that will not longer be maintainable.

The "closed unless posted open" policy that is being proposed is not consistent with what is currently being used and will only confuse people, because they are use to the "open unless posted closed" policy. This is putting the responsibility on the user instead of the BLM. This policy is in the process of being challenged by a lawsuit in the El Dorado USFS.

In closing, I am recommending the above alternative because of the Draft EIS discrepancies in route designation and lack of a complete inventory of those routes, obsolete tortoise plans, and I am requesting that the "OPEN unless posted close" policy continue to be practiced. Please, place my name and address on any future notices on this process.

Sincerely,

  
Andrew Hammitt

:  
**Steven Smotherman**  
**P.O. Box 782**  
**Leona Valley, CA 93551**  
[3SMO@Earthlink.net](mailto:3SMO@Earthlink.net)

September 3, 2003

**West Mojave Plan**  
22835 Calle San Juan De Los Lagos  
Moreno Valley, CA 92553

To Whom It May Concern:

I am writing in response to the proposed West Mojave Plan (WEMO). I am an avid motorcyclist, riding for pleasure and competition. This proposed plan will have long term affects on both my pleasure riding and the ability of motorcycle clubs to put on a race. Though I understand the need for conservation and the protection of the desert tortoise, I feel that the restrictions proposed in WEMO are very severe and restricting to the general public and their ability to enjoy the land.

I would like to express my concern and displeasure regarding several items proposed by WEMO.

- Please extend the comment period. Ninety days is a very short timeframe. The public needs more time to read, understand, and respond to the proposed changes.
- I would like to recommend that only one large DWMA be added as described in Alt. E. The DWMA should be a combination of acreage from the proposed Fremont-Kramer and Superior-Cronese DWMA's and contain 1,118 square miles.
- BLM should implement a captive breeding program to replenish the tortoise population in the Fremont Valley. Likewise the raven population should be brought under control for the tortoise to recover and the breeding program to be successful. I also do not believe in the implementation of the fencing recommended in DEIR/S. The fencing will only provide an excellent perch for the ravens.
- I believe that all routes should be considered open unless they are signed closed. Likewise all routes designated open should be considered approved for dual sport use and no further EA or monitoring should be required for organized tours.

.....

September 3, 2003

Page 2

- I see that there are twenty-three sub regions, but only eleven were fully surveyed. The other twelve relied on the 1985-87 survey which contained no single track trails. I would like a complete survey.
- The Johnson to Parker, Johnson to Stoddard race corridors are shown as open routes. These events have been litigated in the past and approved by the courts. Language should be included to allow the continued use of the corridors for competitive events. I disapprove of the DEIR/S proposal that no competition be allowed outside the open areas.
- I request that the "C" routes be reopened at the Spangler Open Area and the routes should be placed back into the inventory.
- I believe that motorized recreation has made large contributions to the economic benefits in local areas. The "Motorcycle Industry Council estimates motorized recreation contributes SIX BILLION dollars annually to the California economy". Many local areas benefit greatly from the increased hotel/motel and restaurant business brought in by organized races.
- Alt. G provides for no change to existing networks. I propose the following two options. (1) The number of routes should not be reduced until closures are determined on a case by case basis, supported by site specific analysis to determine any ill effects. (2) There should be at least two alternatives with a variety of route networks selected from existing routes.
- I feel that DEIR/s fails to provide data to support the proposal in Alt. A thru E to reduce open routes in ACECs and in high density tortoise areas. I fail to see the documentation that indicates the methods or data used to determine which routes would be closed and the location of these routes. Also, where is the scientific justification for such closures?

Please consider my comments and concerns as stated above. I would also like to be included on the BLM's mailing list. If we work together, I believe we can come to a compromise that will benefit conservationists and motorcyclists alike.

Sincerely,



Steven Smotherman

Cc: Bill Howell, D-37 WEMO Coordinator

Comments on West Mojave Plan draft Environmental Impact Statement:

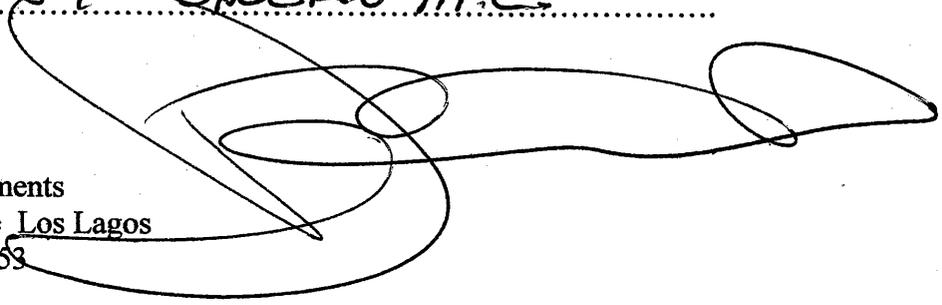
- 1... Specify that the Johnson to Parker and Johnson to Stoddard corridors are to be used even though they are outside the open areas ... the language in the book is not clear and contradictory on competition events outside .... be clear .....we want to use them
- 2....Reinstate and reopen all "C" routes closed in the interim Spanglers and all others These interim closures are to be terminated at the signing of this document...
- 3... All routes to be considered OPEN unless signed closed
- 4...Reinstate a B to V corridor for competition

Name: *DOUGLAS WILLIAMS*  
 37143 Keith Court  
 Address: *ALMOALE CA 93550*

Organization: *DISTRICT 37 CHECKER M.C.*

BY SEPTEMBER 12

TO: West Mojave Plan Comments  
 22835 Calle San Juan De Los Lagos  
 Moreno Valley, Ca. 92553





OFF-ROAD BUSINESS ASSOCIATION, Inc.

September 4, 2003

115  
BOARD OF DIRECTORS  
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BLM  
West Mojave Plan  
22835 Calle San Juan de Los Lagos  
Moreno Valley, CA 92553

Subject: Comments on the Draft West Mojave Plan and DEIR/S

The Off-Road Business Association (ORBA) was a major participant in and signatory of a joint comment on the West Mojave Plan, along with several other California OHV organizations. However, we wish to submit this supplemental comment that more specifically addresses the concerns of our particular constituents.

ORBA is a non-profit organization composed of hundreds of businesses nationwide involved in the off-highway vehicle recreation industry. As such, our principal mission is to protect the future success of those businesses by resisting the trend to close public land to motorized access. The majority of our member businesses are in California.

From Chapter 2 of the Plan document:

**PRINCIPAL GUIDING CRITERIA AFFECTING MOTORIZED ACCESS—  
NEPA and CEQA:**

Carefully evaluate the cumulative effects of the proposed action. Such an analysis is to include: both the current situation, as well as the foreseeable future; evaluate both direct and indirect impacts both within the geographical borders of the action, **as well as beyond** and; include as part of its cumulative impact analysis not only an evaluation of biological and cultural factors, **but also include an evaluation of economic and sociological factors (including recreation). [emphasis added]**

The proposed Plan shares a shortcoming with many similar plans: it contains an examination of the economic impact of the Plan within the plan area, but no consideration of the economic impact of the plan outside of the Plan area.

An aspect of the economic impact of loss of access to public land that is seldom analyzed is the effect of such closures upon businesses and employees that rely for their livelihood upon OHV recreation. Whenever there is significant loss of OHV recreation opportunity—and we would consider several million acres of California desert over the past few years to be significant—there is a corresponding reduction in the purchase and maintenance of OHV recreation equipment. It is obvious that if the current

trend continues, businesses in the OHV industry will eventually be forced to close their doors.

A 1993 survey conducted by Sacramento State University's Institute for Social Research documented that OHV recreation annually generates more than \$3 billion in economic activity statewide. The survey also found that OHV recreation generates roughly \$1.6 billion in personal income and affects 43,000 jobs within California.

In the ten years that have elapsed since that survey, the popularity of the sport and the cost of the equipment utilized have increased dramatically. Consequently, it is estimated that today OHV recreation contributes somewhere between \$6 billion and \$9 billion to the California economy. Considering that California's economy has plummeted in recent years to the point that it is now one of the worst in the nation, that state can ill afford any further blows.

The Off-Road Business Association stands in firm opposition to further closures of public land to motorized access, particularly where such closures are not supported by sound, peer-reviewed science. Unfortunately we find that, as is all too often the case, many of the closures proposed in the West Mojave Plan are in fact *not* adequately supported by such science. And, for the reasons outlined above, such closures should not be considered until their true, wide-ranging economic impacts are given careful consideration.

Best regards,



James G. McGarvie  
Executive Vice President

September 1, 2003

WEMO  
West Mojave Plan  
22835 Calle San Juan De Los Lagos  
Moreno Valley, CA 92553

Dear Sirs:

I am an off road enthusiast that has participated in organized off road events sponsored by District 37, for more than thirty years. My family and I continue to enjoy weekend outings in the Mojave Desert. I have just recently become aware of some of the key provisions detailed in the WEMO document. Upon reviewing it I have some concerns which I feel should be addressed. Briefly they are as follows:

I feel that three months is too short of a time period for the general public to evaluate and respond to the document. I would like to see the comment period extended.

The public meetings that have already been held were held in areas far from the metropolitan areas where most of the recreational users of the areas to be impacted reside. I would suggest more meetings be scheduled in the metropolitan areas.

All routes should be considered open routes unless posted closed. I feel it is important that the public can assume a route is open unless otherwise posted. To use an analogy, when a person drives from San Diego to San Francisco, they assume the roads they are traveling on are open for use.

Do not implement the fencing proposals detailed in the DEIR/S. Not only is fencing a potential hazard to off road enthusiasts, but it could feasibly provide nesting perches for ravens, which are a natural enemy of the desert tortoise. The raven population must be controlled in order for the tortoise recovery program to be effective.

The corridor which has been traditionally referred to as the Barstow to Vegas corridor has been deleted simply because it was omitted in NEMO. I would like to see it placed back in the route inventory, thereby being included in WEMO.

The Fremont Recreation Area should be connected to the El Mirage and Spangler open areas by utilizing existing routes.

I feel that any closure or restriction on open riding areas in the Mojave would not only impact families that go to these areas for recreation, but it would negatively affect businesses that rely on these individuals buying dollars to survive.

The Johnson Valley to Parker Arizona, and Johnson Valley to Stoddard Wells, race corridors are shown as open routes. The DEIR/S proposal is that no competition be allowed outside of the open areas. Congress specifically allows for point to point events. These events have been litigated in the past and have received court approval. Terminology should be included to allow the continued use of the corridors for competitive events.

Thank you for your time, and if at all possible I would like to be included on the BLM mailing list.

Sincerely,

A handwritten signature in black ink that reads "Thomas Purdy". The signature is written in a cursive style with a long, sweeping underline that extends to the right.

Thomas Purdy  
27940 Beechnut Circle  
Valencia CA 91354

Route Designation was the inventory and designation (open or closed) of existing roads and trails on 3.2 million acres of public lands in the West Mojave Desert. That process began in March 2003 with the release of the Environmental Assessment and was completed on May 15<sup>th</sup> with the plan amendment for the Western Mojave Desert Off Road Vehicle Designation Project. The time constraints were placed on BLM as part of the Court ordered settlement of The Center for Biodiversity vs. Dept of the Interior (BLM) lawsuit.

The West Mojave Plan, A Habitat Conservation Plan and California Desert Conservation Area Plan Amendment is the title of the proposed action which we will be commenting on. The action amends the original 1980 West Mojave management plan. This amendment

is described as a habitat conservation plan and federal land use plan.

This is the largest land use management plan ever written.

It governs 9,359,070 acres of public and private land. This plan has been called WEMO. The public has until September 12, 2003 to make comments on WEMO.

The Thonson to Parker, Thonson to Stoddard race corridors are shown as open routes. The DEIR/S proposes that no competition be allowed outside of the open areas. Congress specifically allowed for point to point events. These events have been litigated in the past and approved by the courts. Language should be inserted to allow the continued use of the corridors for competitive events.

The Barstow to Vegas corridor has been deleted in NEMO. We insist that it be placed back in route inventory

Reopen the "C" routes at the Spangler Open Area. This closure was to be temporary and the routes should be placed back into the inventory.

All duplicate or parallel that were closed in Route Designation should be returned to open status. No consideration was given as to user preference or degree of difficulty

Recommend that the Fremont Recreation Area as described in Alt. E be created as mitigation for loss of recreational opportunity due to route closures.

The Fremont Recreation Area should be connected to Spangler and El Mirage open areas using existing routes.

We would like to see "C" route system established at Cinnamon Hills as described in alt. E.



# United Four Wheel Drive Associations

Director of Environmental Affairs

12543 Via Diego

Lakeside, CA 92040

September 6, 2003

BLM  
West Mojave Plan  
22835 Calle San Juan de Los Lagos  
Moreno Valley, CA 92553

Subject: Comments on the Draft West Mojave Plan and DEIR/S

The following comments are submitted on behalf of the United Four Wheel Drive Associations. United is an international association representing over 15,000 members that are involved with motorized recreation. Many of our members are residents of California or have participated in the recreation opportunities available in the Southern California desert regions.

Many United members have played an active role in the West Mojave Plan process, commenting to the draft document and participating in the route designation process. We continue to have a vested interest in the outcome of the West Mojave Management Plan decision. Our members are directly affected by management decisions for the California desert region through this document and pending decision.

Our members subscribe to the concepts of: 1) public access to public lands for their children and grandchildren; 2) condition and safety of the environment; and 3) sharing our natural heritage. With these guidelines, the below comments were developed. The general public desires access to public lands now and for future generations. Limiting access today deprives our children the opportunity to view the many natural wonders of public lands. The general public is deeply concerned about the condition of the environment and personal safety. They desire wildlife available for viewing and scenic vistas to enjoy. They also want to be feel safe while enjoying the natural wonders. Lastly, the public desires to share the natural heritage with friends and family today as well as in the future. How can our children learn and appreciate our natural heritage when native species are allowed to deteriorate and historic routes are routinely blocked or eradicated from existence?

After reviewing the Draft Environmental Impact Statement, we support Alternative A: with the following modifications: 1) Implement the Species Conservation Measures with respect to tortoise disease and predator control identified in Alternative F; 2) Implement a consistent "Open unless posted closed" route/transportation policy within Alternative A, Section 2.2.6, Public Land Motorized Vehicle Access Network; 3) Complete the unfinished route inventory and analysis prior to designating any routes as closed; 4) Eliminate the definitions (and designation) of Open Space Corridors, Biological Transition Areas, and Special Review Areas; 5) Implement the Land Use and Route Classification

identified in 43CFR8340; (6) Implement the Recreation Program elements defined under Alternative E; Section 2.6.4; (AE-4), (AE-5), (AE-6), (AE-7), and (AE-8); and 7) Develop a financial management plan and schedule for implementing recommendations of the final Environmental Impact Statement.

We find three major problems with the Draft WEMO Management Plan: 1 - economic impact; 2 - route designation; and 3 - excessive designation of habitat.

1 - Chapter 2 of the WEMO document includes the below paragraph:

**PRINCIPAL GUIDING CRITERIA AFFECTING MOTORIZED ACCESS—NEPA and CEQA:** Carefully evaluate the cumulative effects of the proposed action. Such an analysis is to include: both the current situation, as well as the foreseeable future; evaluate both direct and indirect impacts both within the geographical borders of the action, *as well as beyond* and; include as part of its cumulative impact analysis not only an evaluation of biological and cultural factors, *but also include an evaluation of economic and sociological factors (including recreation). [emphasis added]*

The proposed Plan shares a shortcoming with many similar plans: it contains an abbreviated examination of the economic impact of the proposal within the plan area, but no consideration of the economic impact of the plan outside of the plan area.

An aspect of the economic impact of loss of access to public land that is seldom analyzed is the effect of such closures upon businesses and employees that rely for their livelihood upon OHV recreation in the cities and suburbs outside the immediate geographic region. Whenever there is significant loss of OHV recreation opportunity, and we would consider several million acres of California desert over the past few years to be significant, there is a corresponding reduction in the purchase and maintenance of OHV recreation equipment. It is obvious that if the current trend continues, businesses in the OHV industry will eventually be forced to close their doors.

A 1993 survey conducted by Sacramento State University's Institute for Social Research documented that OHV recreation annually generates more than \$3 billion in economic activity statewide. The survey also found that OHV recreation generates roughly \$1.6 billion in personal income and affects 43,000 jobs within California.

In the ten years that have elapsed since that survey, the popularity of the sport and the cost of the equipment utilized have increased dramatically. Consequently, it is estimated that today OHV recreation contributes somewhere between \$6 billion and \$9 billion to the California economy. Considering that California's economy has plummeted in recent years to the point that it is now one of the worst in the nation, that state can ill afford any further blows.

This plan also gives short shrift to the economic impact on the desert communities in the immediate geographic region. The local communities will experience significantly increased economic impact that identified in the plan.

2 - During the preparation of the route inventory, the BLM identified 21 areas

(polygons) within the area covered by the West Mojave Plan. Of these areas, five have been surveyed for single and two-track routes. Six areas have been partially surveyed covering two-track routes. The remaining ten areas have never been surveyed.

The plan uses new data in combination with old data based on a 1985-87 route inventory. The new route inventory clearly demonstrates that the 1985-87 route inventory fails to represent the actual network of routes on the ground, under accounting for routes in all surveyed subregions by an average of 155%. In the Kramer subregion, the actual inventory was found to be nearly 450% larger than that within the 1985-87 route designations.

With almost half of the subregions surveyed, and knowing that the survey was erasing all credibility of its 1985-87 inventory, the BLM denied the 2001 route survey project the necessary funding to complete the survey in the remaining subregions.

The remaining subregions together accounted for over 25% of the 1985-87 inventory. Based on the experience in the eleven surveyed subregions, it is reasonable to expect that the 1985-87 inventory fails to include some 1050 to 1450 miles of legitimate and noticeably traveled routes. Furthermore, the 1985-87 route inventory fails to designate single track motorcycle routes, only traditional two-track routes.

Therefore, we find that the Plan neglects to apply the best available data to the question of route designations in the twenty-one subregions within the plan by relying on proven obsolete route inventories rather than completing the 2001 route survey project across the entire planning area.

Of the five single track surveyed areas, none were listed in the preferred alternative maps. Yet, this plan presents the public with a route system that is about 25% surveyed, 25% partially surveyed and almost 50% un-surveyed. The completed surveys indicate that the 1985-87 route inventory is inaccurate with significant underreporting of existing routes (by an average of 155% underreporting of routes). The use of the faulty inventory is inadequate to develop a viable route system.

There needs to be a system in place to permit BLM to complete the survey so there will be an accurate route system of single-track and two-track routes. In the meantime, no closure of routes in the 10 un-surveyed areas and the six areas with incomplete surveys should be permitted unless or until a separate analysis is done regarding such closures. To implement a route system in these areas now would be premature and irresponsible.

BLM needs to make a concentrated effort to identify single track and two track routes and complete the current route inventory. All routes have been identified in five areas. All of these routes are not listed on the maps. This action must be completed. Again, a closure of routes in all areas needs to be prohibited so that we do not inadvertently deny the use of a perfectly good route.

3 - The WEMO Plan introduces Open Space Corridors, Biological Transition Areas, and Special Review Areas in addition to Designate Wildlife Management Areas. These areas are identified as necessary for critical habitat or as buffer areas for critical habitat.

In a landmark decision dated May 9, 2003, U.S. District Judge Anthony Ishii ruled that the U.S. Fish and Wildlife Service (FWS) engaged in an unlawful land grab when it designated critical habitat for the Alameda whipsnake. Pacific Legal Foundation successfully challenged the action focusing on the government's failure to follow the requirements of the ESA when making the determination of critical habitat for the whipsnake. It was shown that FWS didn't bother to identify what areas were truly needed by the snake and simply included all land it believed was within 'the range' of the snake that 'might contain' 'habitat features.' The court ruled that the law requires a far more careful analysis than the government performed and ordered the FWS to undertake a thorough review.

We believe similar circumstances exist with the designation of multiple areas for the core issue of 'habitat designation' for Desert Tortoise. In this instance, identifying 'Open Space Corridors', 'Biological Transition Areas', and 'Special Review Areas' in addition to the DWMA's increases the area that is truly needed by the Desert Tortoise. These additional areas includes land that is identified as 'within the range' or 'might contain habitat features' without the documentation that the areas are truly needed for species protection.

Based on these three key issues, United stands in firm opposition to further closures of public land to motorized access, particularly where such closures are not supported by sound, peer-reviewed science. We believe many of the closures proposed in the West Mojave Plan are in fact **not** adequately supported by such science and may violate existing law. And, for the reasons outlined above, such closures should not be considered until their true, wide-ranging economic impacts are given careful consideration.

Thank-you,



John Stewart  
United Four Wheel Drive Associations  
Director of Environmental Affairs  
12543 Via Diego  
Lakeside, CA 92040

Dear Sir ,

This letter is to inform the BLM of my opposition to the opening of proposed undesignated route P-69-J1299 to the WEMO plan. This illegal motorcycle trail runs through the critical riparian area known as Cottonwood Spring within the Juniper Flats ACEC. This spring is home to several sensitive species including the San diego horned lizard ,the grey vireo and desert tortoise.It is also an important habitat for the golden eagle as well .

This illegally created motorcycle trailgoes right through an area that has been recognized by the BLM as an old native American cultural site. It has been illegal to drive motorized vehicles through this area since the Willow Fire, but due to a lack of law enforcement, local motorcycle riders have been trespassing within the Juniper Flats ACEC. The damage is counter productive to the restoration work done by the BLM. Not only would I like to take this opportunity to voice my opposition to this motorcycle trail, but I would also like to request that law enforcement resources protect the Juniper Flats ACEC from illegal trespass by these motorcycle riders.

I have been enjoying the solitude of this hidden oasis in Juniper Flats since I was a small child in the early 1980s when my father would take me hiking there. Please protect this special place from the damage the motorcycles are causing and remove P-69=J1299 from the WEMO plan. People and animals need a refuge from the noise.

Sincerely,  
Asha Van Voorhis  
7268 Sierra Madre tr  
Apple Valley, Ca  
92308



**West Mojave Plan  
Public Hearing**

July 17, 2003 Kerr-McGee Center, Ridgecrest

Written comments

Name: Jon Northrop

Organization:

Alternative & Drought tolerant Landscaping, Southern California Conservation Worker.

Address: Luna Vista Ranch  
24550 oak Springs Rd  
Apple Valley Ca 92308

Comments on West Mojave Plan draft Environmental Impact Statement:

Main Topic of concern: Cattle Grazing in Round Mountain Allotment Area.

The Round mountain Grazing Allotment is just miles from my home and The cows have done more damage to this area than <sup>anything</sup> I have ever seen any where. In particular, the damage that concerns me the most is to the very small riparian areas we have left. It is far to dry for even native wild life. Let alone anon native species. The future of this area of public land near deep creek and apple valley is in danger of ~~becoming~~ becoming a barren wasteland. I have personally seen the decline of all wildlife. As a result there is less public traffic.

It is in the interest of the blm to preserve wildlife in this area so public awareness is that of a area worth preservation.

West Mojave Plan  
Public Hearing

July 17, 2003 Kerr-McGee Center, Ridgecrest

Written comments

Name: MARY MURRAY

Organization:

Address: 24550 OAK SPRINGS Rd  
APPLE VALLEY, CA 92308

Comments on West Mojave Plan draft Environmental Impact Statement:

There should be no cattle grazing allowed in the area covered by the West Mojave Plan. This area is too dry to support cattle, which are an exotic species that make its home in streambeds; unlike horses, burros, buffalo, or other indigenous species. The ecosystem of the West is too dry to support cattle.

I have personally witnessed both the overnight destruction of the stream beds when the cattle are released in the winter, and the gradual long scale degradation which occurs when this continues over time. One day the stream is flowing and clear and the next day it is a stinky, trampled area of mud and cowshit. Over time, with the destruction of vegetation caused by the grazing in the streambed and all over as well as the trampling and pollution of the streambeds - mass destruction of wildlife habitat - the streambeds are no longer shaded and they evaporate. Streams that used to flow year round in the fifties now flow only seasonally - if that! Streams

that flowed every winter when we moved up here in 1986, now hardly ever flow. Hardly any streams ever flow up here now and they all flowed seasonally in 1986 and year round in 1950.

With the drying up of the streams, the groundwater retreats deeper - drying up springs and suppressing wildlife depend on. The intense drying up of this area from the semi-forest it originally is are caused by riparian damage and deforestation caused by cattle grazing & fires <sup>and</sup> exacerbated by cattle grazing. This affects the depth of the ground water in the whole area. Cattle grazing here is destroying an ecosystem - whose job it is for the BLM to protect - and damaging the economy as well.

I don't believe that cattle should be allowed to be grazed in this area, and, to help keep down the invasive species of non-native vegetation, horses or wild burros should be re-introduced. According to the Wild Bury + Wild Horse act of 1971, areas where they are roaming should be designated their range. I saw a herd as late as 1979. When are they?

## West Mojave Plan Public Hearing

July 17, 2003 Kerr-McGee Center, Ridgecrest

### Written comments

Name: Jerry C. Murray

Organization: Luna Vista Ranch

Address: 24550 Oak Springs Rd. Apple Valley, Ca.

### Comments on West Mojave Plan draft Environmental Impact Statement:

Cattle grazing is totally incompatible with any arid ecosystem. The combination is a major cause of desertification. Cattle evolved in Northern Europe, which is mostly a riparian habitat, with a lot of rainfall. In an arid environment, the riparian zones are very thin and few, yet most, if not all, of the indigenous species are totally dependent on these zones for water, shade, coolness, yet most, if not all, get most of their food outside of the riparian zones (esp. the larger grazers), and, in many cases, do not degrade the delicate, yet vital riparian zones.

The cattle, on the other hand, start out by being put out on the allotment fairly early in the wet season, as soon as some substantial new growth had accrued. They then proceed to eat the riparian zone to the ground, defecating and urinating in the stream (in wet years) as they tromp around and in, the stream, or in drier years, the few wet spots. And so, in only a very few years, the pristine little stream, sparkling in the sun, surrounded on both sides by a wide band of greenery, quite varied, filled with wild life of all sorts, is now a band of brown muck, just like the feedlot variety, winding through a suddenly brown (mostly) environment, then they begin eating out into the drier areas until what is left is basically what the cows can't eat and are removed. And year after year - no new wet growth, no build-up of organic material in the soil to hold the water, no gradual evolution of the eco-system, back to its natural state. You are artificially maintaining the desertification of the grazed land. This is not the natural condition of this land, as received into the custody of the Federal Govt agencies. It was a full climax forest. Even as late as 1952, this area was fully forested, down to the RR tracks heading east to Lucerne Valley now the use of "wild fires" and cattle grazing every wet season thereafter, keeping it bare and barren is a atrocious, and obvious to all who all who witness it. As long as cattle grazing continues on this arid land, while under your care, then nothing you say or do about your concern for this environment has any validity! It is all just another scheme (or scam) to get more of the public's money into some bodies' greedy hands. Not one of your proposed actions, or even most of them, in all probability, would do as much to rejuvenate this area, as getting the cows off its back!

The Taylor Grazing Act says (paraphrased) "No grazing if it degrades the eco-system!" well, IT has, does and is, so STOP IT, Guys!

2 You even kicked the wild horses and burros out, for the cattleman, who apparently needed ALL the graze. If any one thinks that act impressed any one, other than the welfare recipient, ie the allotment Permittee, then the blinders must be really tight! That, and I guess no one around here ever heard about the "Wild and Free Roaming Horse and Burro act (1971)", much less read it. It sure wasn't implemented here! As recently as 1982, I saw a 28 Burro herd, heading down the Powerline rd, South, from Juniper Flats, down to Deep Creek Spillway. So where are they now? Dog food? Right? And horses evolved here in the west long before any men were here. And don't destroy the riparian zone. So out with the cows, back in with horses.

West Mojave Plan  
Public Hearing

July 17, 2003 Kerr-McGee Center, Ridgecrest

Written comments

Name: Joseph Margason

Organization: The Public

Address: 23999 out post rd s.B.CO

Comments on West Mojave Plan draft Environmental Impact Statement:

I have made the high desert my home for over 25 years now, this after many years prior I used these lands for recreation & vacationing. And having done so has afforded myself & my family the opportunity to observe the changes that have taken place over this time period. And I am sad to say most have been for the worse, for most among the many things that have been allowed to take place I would have to say that the grazing has been the most destructive of the lot. ANY benefits (AND I see none) are far outweighed by the damage brought on by allowing a select few to graze their cattle at a greatly reduced cost over that of private pasture. On an already overburdened ecosystem the delicate balance that made this area unique has been run over roughshod. If we are to hold any hope for its recovery the grazing of live stock must cease immediately!! and serious steps taken to repair the damage brought on by decades of irresponsible cattle men & of those that were entrusted with the care and guardianship of these public lands. Public lands that means that they be maintained in a responsible manner that all may reasonably use and enjoy them and not be given over to the few elect that believe it their right to do with as they see fit and the hell with everybody else. There is not room here to describe or identify the number of springs that have been lost, <sup>streams</sup> ~~streams~~ polluted or destroyed. As for native plants god only knows as for wild life populations the decline of most the end of more than a few the species that habitate this area were in harmony with it, kept in check by the balance of nature. Not by the balance of some one's check book!! IN a give & take system each needs to be equal for it to survive. So I say stop giving to those who only take, from me - from you - from our children - so that their children might have the chance to see use and enjoy that which is theirs mine & yours. Do what you are there to do protect, preserve improve

P.O. Box 5988  
Orange, CA 92863-5988  
deepcreekvolunteers@hotmail.com  
(714) 771-3702



# Deep Creek Volunteers

September 6, 2008

Bureau of Land Management  
22835 Calle San Juan De Los Lagos  
Moreno Valley, CA 92553

Subject: Comments on West Mojave Plan

Dear Sirs:

We are writing to you to oppose the proposed legalizing of an OHV trail right through this area and which was added to the WEMO plan through an amendment after it had been submitted to the public for approval.

Please allow us to introduce ourselves. We are a group of concerned citizens interested in preserving Deep Creek Hot Springs and the surrounding area from the adverse effects that certain forms of increased visitation has on the environment. We try to our part by collecting trash and educating visitors on current USFS regulations and customs as well as the effect that their visit may have on the environment.

As you are aware, the hot springs are part of San Bernardino National Forest. Therefore we generally work on most issues with the United States Forest Service. However, most access routes to the hot springs cross over land that is under your agency's jurisdiction including the entire Juniper Flats area. We are concerned about planned changes to the access of Juniper Flats that may adversely affect the environment there.

It is with this in mind that we are against legalizing of an OHV trail that threatens the Cottonwood Springs cultural and riparian area. This trail we are referring to is described in Table 1 "Proposed Specific Modifications of Designation Project Route Network" under the heading DR.2 Decision, PPA.2.2.2 Designation Project EA and Amendment Errata which states: " P\_Map\_69-J1299 - Open undesignated route originating from the intersection of J 1085/J 1029 south via sections 26/35, T 4N, R3W, and west via Section 1, T3N, R3W and ending at J 1003." I believe that this trail is now being designated J1299 (see WEMO Amendment -- P\_map 69- J1299 Bureau of Land Management CDD).

Juniper Flats Rd. and other current open roads already provide adequate access across Juniper Flats. Our group is against the legalizing of any additional OHV trails across the Juniper Flats area. This trail in particular crosses areas that have been previously closed to all vehicles to allow the vegetation to grow back. The fences and signage that were installed as part of this restoration process were funded by taxpayer money. However, opening the area to OHV will mean that all the positive use of our taxes will have been wasted. This entire area is environmentally sensitive and following the Willow fire, your agency did a great job limiting the access to the area and closing many of the unused roads.

As it is today, many OHV users do not respect the current regulations and frequently take their vehicles off designated trails and into sensitive areas. Having a legal route will only increase this abuse. The Cottonwood Springs area is even more environmentally sensitive than the rest of Juniper Flats due to its cultural and riparian areas. This trail that did not exist prior to the Willow fire will cross right through that area. J1299 is already deeply rutted as the result of OHV non-compliance following the Willow fire closure. The tire tracks of these vehicles are visible even after all vegetation grows back following the winter storms. Legalizing the trail would send a signal to the OHV community that non compliance will be rewarded. OHV noise is disruptive to animals and to recreational users that are hiking in the area. We do not oppose horse or hiker use of the area, only OHV due to the damage they produce on the landscape.



September 6, 2003

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We request that OHV access be limited to the present open routes (Juniper Flats Rd., Power line Rd., and Bowen Ranch Rd.) We understand that Juniper Flats is designed as a limited use OHV area and that several nearby areas have already been provided for unrestricted OHV use.

We appreciate your consideration of our request and would welcome the opportunity to be involved in any future planning efforts that involves Juniper Flats and Deep Creek Hot Springs.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ron Mercer', written over a horizontal line.

Ron Mercer

Group Coordinator

Aug. 30, 2003

To Whom It May Concern,

My name is Nancy Rauen. I am and for many years have been enjoying our California deserts with my family. Being a housewife and working full tome I look forward to the relaxing times we spend in the desert. Now I understand The West Mojave Plan could take this away from us.

I am concerned with a number of issues with The West Mojave Plan.. First of all, the time factor is too short. Being only 90 days, it is impossible for me and the rest of the public to respond and absorb such a large document. **There should be an extension.** Secondly, there was no meetings in the L. A. Basin where a great many fellow desert enthusiast reside. **There should be at least two more meetings to inform the public of the proposed closures.** I also support Alt. E, adding only one large DWMA. I would also like to put on the BLM mailing list, in order to be up to date on this issue.

*Nancy J. Rauen*  
6560 N. Longmont Ave.  
San Gabriel, Ca. 91775

Aug. 30, 2003

To Whom It May Concern,

My name is Stacey Rauen. I have been going out to the desert with my family for many years. It is fun. Why are you taking this away from me.

I am concerned with a number of issues with The West Mojave Plan. First of all, the time factor is too short. Being only 90 days, it is impossible for me and the rest of the public to respond and absorb such a large document. **There should be an extension.** Secondly, there was no meetings in the L. A. Basin where a great many fellow desert enthusiast reside. **There should be at least two more meetings to inform the public of the proposed closures.** I also support Alt. E, adding only one large DWMA. I would also like to put on the BLM mailing list, in order to be up to date on this issue.

*Stacey Rauen*  
6560 N. Longmont Ave.  
San Gabriel, Ca. 91775

9/8/03 125

Dear Bureau of Land Management, I'm 2nd generation desert lover and dirtbike riding enthusiast. My father and I have shared our love and respect for the desert my whole life. I've recently introduced my 2 year old (Brandon) to the great California Mojave desert. I'm hoping that he too will be able to introduce his children to the same beauties, I've been fortunate enough to experience?

My name is Don Howard and I'm born and raised in the L.A. area. If possible could you please hold a meeting in L.A. County? So my family and I can be heard. Is there any chance we can extend the comment period to give other Angelinos who use our Mojave desert a chance to comment?

I would support a "head start" program of captive breeding to replenish the tortoise population. The DEIR/S route closures and motorized recreation bans lack documentation and I consider them guesstimations!

My interpretation of our Routes guidelines is that there open unless signed closed. Since we use and pay to race in the desert, I expect a complete survey of all sub-regions.

It's a dream of mine to race the Banstow to Vegas, Johnson to Parker. I supported my Dad's passion for these great races and we deserve the change to experience them. Please clean up the verbage to

In closing, I would really like to share the desert with my ever growing family and will do what ever is asked of me, to fight for our voice to be heard. Please include me on the BLM's mailing list. Yours truly

Den Howard  
Brandon Howard  
Melissa Howard  
Ethan Howard