

West Mohave Plan  
22835 Calle San Juan De Los Lagos  
Moreno Valley, CA. 92553

As an avid motorized off road recreational vehicle user, I feel that my rights as a taxpaying citizen may be in jeopardy by the brief 90-day comment period for the "WEMO" plan.

I feel this comment period is far too short to receive proper input on a decision of this magnitude that has the potential to affect so many lives.

Please consider an extension of the comment deadline and include me on future BLM Mailings.

Respectfully,



Robert Furman  
803 Estancia  
Irvine, CA. 92602

To: BLM  
From: Rick Riebsomer and Family  
Subject: WEMO  
Date: 9/9/04

My family and I camp and recreate in the California Desert. On average we go out for motorized recreation about 12 to 15 times a year. My 14-year-old son and I participate in D37 desert events.

After attempting to read through the West Mojave Plan (WEMO) I feel like the comment period to state your opinion on something of this scale is far to short, please extend this time so it can be well immersed. I also can't help but feel left out on the decision process. I live in the L.A. Basin (Torrance) and find it hard to believe you did not hold any of the public meetings here. Please hold additional meetings where people like myself can attend. This land is Public Land and should be managed with input from all that recreate in the California Desert.

The plan appears flawed with no specific or scientific analysis. The reports are vague and I feel, just speculation. The proposal for four DWMA's does not express the recommendations of the Super Group. This option is a recipe for management disaster. The suggestion to add only one large DWMA as described in ALT. E would be better suited for good land management.

The Spangler Hills open area (Red Mountain) was reduced with the closure of the "C" routes. Please reopen these routes that were unjustly closed "temporarily". Also, the Cinnamon Hills area (Lucerne Valley) should have an open "C" route system. These two riding areas are very important to D37 and this creates a better balance of land available to use for our events.

In touching on just a few topics of which there are many more, I would like to thank you for letting me respond and hope that you listen. This WEMO plan appears to have the biggest impact on motorized recreation and the proposed alternatives provide no opportunity for choice.

Thank you,  
The Riebsomer Family



Jess B. McKinley  
622 Longfellow Ave  
Hermosa Beach, CA 90254  
Tel: (310) 717-3297  
[jess\\_mckinley@yahoo.com](mailto:jess_mckinley@yahoo.com)  
AMA # 481873

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

September 9, 2003

**RE: Comments on the Proposed West Mojave Plan (WEMO)**

As an active member of the American Motorcycle Association and the Ventura Motorcycle Club, and as an avid off-road enthusiast and frequent visitor to our public lands in the Western Mojave, I would like to comment on the proposed WEMO plan.

I recognize the need to ensure responsible use and management of our public lands, and that the democratic process of creating a fair and representative plan that incorporates the interests of all involved parties is essential to employ to ensure this end.

However, in the case of the proposed WEMO plan, this democratic process has failed. Moreover, the collective intelligence, or lack thereof, that the tenets of this document are based upon, is outdated, inconclusive, and lacks due diligence. Creating a fair and representative plan, based on bad data and uninformed assumptions, is absolutely negligent, and unequivocally irresponsible. Please see the comments below.

- o **Respect Interim Route Closures** – Trails and competition routes that have been temporarily close, should be reopened. For example, the "C" routes in the Spangler Open Area should be put back into the open inventory. Additionally, the Barstow to Vegas corridor has been deleted simply because it was deleted in NEMO. This corridor needs to be put back into the open inventory.
- o **Mitigate Loss of Route Closures** – the Freemont Recreation Area described in Alternate E, should be created, and should be connected to the Spangler and El Mirage open areas using existing routes.
- o **Reopen Duplicate Route Closures** – Duplicate routes are indiscriminately closed without regard for the differences in terrain or degree of difficulty. These routes must be reopened.
- o **Responsible Protection of the Desert Tortoise** - The current proposal for setting up the Desert Wildlife Management Areas (DWMA) is based upon outdated tortoise studies from the 1970's and '80's. The assumptions made from those studies can no longer be relied upon. Respiratory disease and the predatory habits of the raven, a bird that is not indigenous to the area, need to be studied so a comprehensive and effective plan can be put into place. In general, smaller and better-funded DWMA's would be more manageable, have higher degree for success, and would open more land for the responsible use of off road enthusiasts.

Thank you, and I trust that these comments will be taken into account during the final decision making process. Please call me at 310 717 3297, or email me at [jess\\_mckinley@yahoo.com](mailto:jess_mckinley@yahoo.com) if you have any questions, comments, or feedback.

Sincerely,



Jess B. McKinley

GINA OWEN

September 8, 2003

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

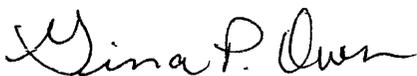
Please extend the public comment period regarding the WEMO plan. Ninety days is far too short of time to read, digest, and verify sources quoted in the DEIR/S.

I would also like to see the following:

- More meetings on the West Mojave plan, and these meetings need to be held in the Los Angeles area.
- All off highway routes in the WEMO area to be considered open unless properly signed otherwise.
- The Johnson to Parker, Johnson to Stoddard race corridors stay open and allow the continued use of these corridors for competition events.
- Reopen the "C" routes in the Spangler Open Area.
- The Freemont recreation area to be connected to the Spangler and El Mirage recreation areas using existing routes.
- No fencing erected to close in (or SHUT OUT) any part of the West Mojave area.

Please add me to your mailing list. I am very concerned about the lack of scientific evidence and independent review that went into the DEIR/S.

Respectfully,



Gina P. Owen

September 10, 2003

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

Dear Sir/Madam,

After reading portions of the Route Designation and Plan Amendment of the West Mojave Plan, I feel the need to make a few comments and requests. As a Orange County resident whose family regularly recreates in the areas impacted by this plan, I feel strongly about the points listed below. Not only do I camp and hike in these areas, but my family participates in competition events also. Lastly, please include me on the BLM mailing list.

1. The comment period needs to be longer. There is a tremendous amount of information contained within this document. So much so, that 90 days is not enough to effectively analyze this document, nor verify information contained within the document..
2. Why were there no meetings held in the Los Angeles area? It would seem that most users of this area live in the LA basin. I would like to see 2 meetings added so that the public may be heard.
3. Why doesn't the reflect the recommendations of the Super Group? It appears that the 1.15 million acres for tortoise recovery and 6.4 million acres as critical habitat is sufficient.
4. Create the "head start" program. Use the offspring to restock the tortoise population at Fremont Valley.
5. Ravens are out of control. Create a program to bring this predatory population under control.
6. Do not implement the fencing recommendations in the DEIR/S. Fencing will only provide a perch site for ravens.
7. The conclusions drawn regarding the tortoise decline is not scientific in nature. Why was most of the data referenced not published nor peer reviewed? This is just plain bad practice (and misleading) as well as leading to erroneous conclusions.
8. Unless a route is signed as closed, it should be considered open. This is how all roadway/trails are marked throughout our society – why change it?
9. All open routes should be for dual sport use without any additional EA or monitoring.
10. A complete survey of all 23 sub regions should be performed and should include single track trails. This is something lacking in the current plan and is unacceptable.
11. The race corridors including Johnson to Parker, and Johnson to Stoddard should be specifically listed to allow for competitive events.
12. Put the Barstow to Vegas corridor back into route inventory!
13. The Spangler Open Area "C" routes must be reopened and placed into the inventory.
14. The Fremont Recreation Area (in Alt. E) should be established as compensatory mitigation for recreational opportunities lost due to route closures.

15. The Fremont Recreation Area, Spangler and El Mirage open areas should be linked using existing routes.
16. Alt E creates a "C" route system Cinnamon Hills. I strongly support this initiative.
17. The Study of Economic Impacts should accurately reflect the financial impact on local and state economies resulting from diminished recreational opportunity.
18. Dual Sport events should not have speed restrictions placed on them.
19. Routes should be reduced only on a case by case basis based on detailed analysis and mitigating measures considered.
20. There should be at least two alternative routes selected from existing routes thereby providing an opportunity for choice.
21. There should be scientific justification for closures as per NEPA. The reduction of ACECs and in higher density tortoise population areas fails in this regard.

Thank you for your time, and please include my comments in the public record.

Sincerely,



Lee Turrini  
28522 Cedar Ridge Road  
Trabuco Canyon, CA 92679

**ROY L. OWEN**  
1710 W. KENNETH ROAD  
GLENDALE, CA. 91201  
818-500-8166

September 5, 2003

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

Please consider extending the public comment period on the West Mojave plan, as ninety days is clearly not enough time to fully digest a document of this size. Furthermore, more public meetings need to be added, as none of the prior meetings were held in the Los Angeles basin area.

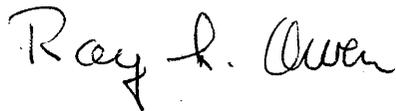
In learning of the West Mojave Plan, it is evident that more scientific research is needed, and independent reviews and audits allowed. With pure speculation on the tortoise's demise, supporting documents of the DEIR/S not being published, and no peer review of those documents, it is evident that more research is needed.

Erecting fences as recommended in the DEIR/S, is not only costly, but also un-necessary and dangerous to say the least. Fences only provide a perch for ravens, and add un-necessary costs to the public for construction and maintenance.

I would like to see the reinstatement of the Barstow to Vegas corridor. Furthermore, the proposed action (alt A) includes Johnson to Parker and Johnson to Stoddard race corridors. It also states that no races will be permitted outside the open areas. The plan **MUST** include specific language assuring that races will be permitted to use these corridors.

In closing, let me say that for over 55 years I have enjoyed the use of the Mojave Desert. During that time, I have shared my love for the desert with my three boys, who now pass that on to their children. Closing the desert to us is fiscally, morally and constitutionally wrong. I urge you to take a longer, more scientific look at this plan.

Respectfully,



Roy L. Owen

West Mohave Plan  
22835 Calle San Juan De Los Lagos  
Moreno Valley, CA. 92553

As a member and Club Officer of the Desert Motorcycle Club and an active participant in sanctioned AMA District 37 Motorcycle racing events, and a recreational user as well as a California citizen and taxpayer I am concerned about the "WEMO" plan and it's impact on the motorized off road vehicle user.

Specifically, I feel that the comment period was far too short for a plan that covers 9 million acres of public and private land. Additionally, there were no meetings in the LA Basin or Orange County area where the majority of the recreational users of all types reside.

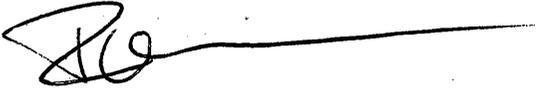
With regard to the plan draft, I feel that routes that are not signed as "Closed" should be considered "Open". This is in congruence with normal Vehicular Signage within the State of California as well as plain common sense.

Congress specifically allowed for point-to-point events, these events have previously been challenged and litigated in the past and subsequently approved by the Courts. Language must be inserted in the plan to allow continued use of the corridors for point-to-point events. Specifically, the plan should address the Barstow to Las Vegas corridor which was deleted simply because it was not included in the NEMO plan. It should also be included in the route inventory along with the "C" routes in the Spangler Open Area that were temporarily closed.

For a segment of the general population that contributes an estimated 6 Billion Dollars annually to the State and local economy, I feel that the opinion of the motorized off road recreational user matters and should be taken into account.

Please include me on any future BLM mailings.

Respectfully,



Robert Furman  
803 Estancia  
Irvine, CA. 92602  
714-417-9970

GREGORY JAMES MALTAS  
ROBIN CLARK-MALTAS  
25680 OAK SPRINGS RD.  
APPLE VALLEY, CA 92308

My CONCERNS REGARDING THE WEST MOSAIC AREA, PARTICULARLY THE GRAZING OF CATTLE. THIS AREA IS A VERY SENSITIVE AREA CAUSED BY THE DEVILS HOLE FIRE AND THEN THE WILLOW FIRE NEED TIME AND CARE TO REVEGETATE, AN ADDITIONAL PROBLEM OF DROUGHT HAS GREATLY REDUCED VEGETATION IN THIS AREA.

ANOTHER PROBLEM WITH GRAZING IS THE DESTRUCTION OF RIPARIAN AREAS. MANY SPRINGS HAVE BEEN POLLUTED WITH ~~BE~~ TAPE WORM LARVAE.

UPON INSPECTING YOUR MAPS I HAVE NOTED THERE HAVE BEEN NO MENTION OF GOLDEN EAGLE, ARROYO TOAD, BURROWING OWL AND MOUNTAIN GOATS THAT ABOUND YEAR ROUND IN THIS AREA.

THERE ARE MANY UNIQUE SITES, TRAILS, HOT SPRING, FLORA AND FAUNA ALL TO BE ENJOYED. WE NEED NO FURTHER DAMAGE CAUSED BY GRAZING IN AN ALREADY UNSTABLE ENVIRONMENT~~2~~

THANK YOU

Robin A Clark-Maltas  
*[Signature]*

September 9, 2003

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

Dear Sir or Madam:

I am writing in response to the proposed West Mojave Plan. My family (daughter, girlfriend, and I) all enjoy riding off-road motorcycles in the high desert. I am moving to the high desert area from Hemet because there are limited off-road recreation opportunities in our area. I am a responsible rider, and only ride in areas where it is legal to do so. I do my best to pass this philosophy on to fellow riders.

I haven't had ample time to review the entire land management plan. That brings me to my first point: **I would like to request that the comment period on this plan be extended at least another 30 days.** To my Knowledge, this is the largest land use management plan ever written and it is my opinion that the public was not given enough time to read and respond to it.

By the time I found out there was a series of public meetings regarding the plan, they were over with. Plus there were no meetings held in the L.A. Basin (lots of off-roaders there). **Please add a couple more public meetings. One question: were any of the people who use this land for recreation asked to be involved with route inventory and selection? If not, then why?**

Alternative A proposes that four 1000 square mile DWMA's be established. What type of formula was used to establish the DWMA's? The whole plan is based on these DWMA's, and it seems to me to be an arbitrary number. In fact it seems as if **much of the documentation supporting the Draft Environmental Impact Report and Statement is speculation.**

The Tortoise Recovery Plan was to have been updated every three to five years. To my knowledge, this hasn't been done. The University of Redlands was hired to develop a data base of information and studies on the desert tortoise. This hasn't been done. **The conclusion that off-roaders are responsible for the demise of the tortoise isn't substantiated.** Perhaps we should attempt to bring the Raven Population under control. Piles of juvenile tortoise shells have been found under raven perches.

Riding in illegal areas will increase as long as more public land is taken away from off-roaders. Of course, this is just pure speculation.

Shawn Girard

CRAIG D. OWEN

September 8, 2003

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

Re: West Mojave Plan

I urge you to extend the public comment period of the WEMO since none of the meetings were held in the LA basin. As a matter of fact I believe that additional meetings held in the LA area, where most of the users of the area reside, are in order.

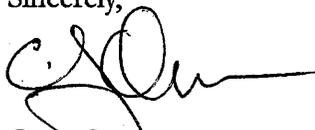
Furthermore, I insist on a complete survey of all existing off highway routes. The BLM is relying on data from a survey performed in 1985-1987 for its inventory of off highway routes. The survey contains no single-track trails in the eleven sub regions. Just because the BLM fails to list a trail, does not mean they don't exist. ALL existing routes should be considered open unless marked closed.

I am amazed and troubled at the same time at the lack of scientific justification for the conclusions that support such a fiscally irresponsible plan. Off highway vehicle owners contribute over six billion dollars annually to the California economy as noted by The Motorcycle Industry Council. Failure to take this into consideration will have a detrimental impact on the already troubled local and state economy.

This plan will have a personal impact as well. Many families, mine included, have enjoyed the use of our public lands for generations. This includes the deserts of California, Mojave to be specific. My father often took my brothers and I on camping trips to the desert, I now enjoy taking my kids, and would hope that they can take theirs.

In conclusion, and as I stated above, more time is needed for public comment and more meetings are needed in the LA basin. With this, I assure you that you will see that this plan is severely flawed. With the proper corrections now, we all can continue to enjoy our public lands while preserving it.

Sincerely,

  
Craig Owen

September 8, 2003

Mr. Bill Haigh, Project Director  
West Mojave Plan  
Dept. of Interior, BLM  
22835 Calle San Juan de los Lagos  
Moreno Valley, CA 92250

Dear Mr. Haigh,

As private landowners with holdings in the proposed DWMA, we note with interest the various restrictions to be imposed on us as well as the possible benefits laid out in the WEMO EIR.

Due to the restrictions on lot size and the requirements to pay a 5 to 1 mitigation fee, our investments in desert lands will be seriously affected, undoubtedly impairing chances of realizing a profit from our investments. Our lands now might have value only as remote homesites where nature-loving people willing to live with no planned provisions for power or water could build.

There are serious threats to the quality of life in the rural desert area. Among them are vandalism and off-highway vehicle impacts.

Regarding off-highway vehicle (OHV) use, we are pleased that BLM is designating routes. However, these routes must not cross private lands without permission from the owner. Below are the ID numbers of just a few of the routes which are designated as OPEN into private land:

EM 1046--OHV trail crosses private land.  
EM 2002--this is a "de facto" open route as it crosses into private land in Section 19.  
EM 2012, 2078--invites trespass into private Section 5.  
EM 1007, 2082, 2085--invites trespass into private Section 9.  
EM 1131--invites trespass into private section 14  
EM 1046, 1069--invites trespass into private Sections 13, 25.  
EM 1187, 1014--invites trespass into private Section 21.  
EM 1078--invites trespass on private Sections 1, 5 near Red Buttes.

The routes in Section 2 of Township 7 North, Range 7 West and Sections 25, 26, 27, 34, 35, 36 of Township 8 North, Range 7 West are in the El Mirage Plan's "zone of influence" and may be traversed by licensed vehicles only. Further, these routes have been illegally created since the El Mirage Plan was put into effect in 1990 and should not be open to OHVs as they invite trespass and route proliferation in the DWMA from riders coming north from the El Mirage OHV park.

The El Mirage Plan was to draw OHV traffic into the El Mirage OPEN area. Millions of dollars have been spent to provide a 40 square mile OHV OPEN area, but riders continue to cross through the "zone of influence" and ride into the Edwards Bowl area. Routes leading north from Shadow Mountain Road should be signed as "Closed" to unlicensed Green Sticker vehicles per the El Mirage Plan.

The proposed WEMO EIR treats OHV use in the Edwards Bowl area as an afterthought with the issues of OHV trespass, safety, residents' quality of life, and trail proliferation being addressed "to the extent possible" (table 2-23). This is unacceptable to us. We have participated in countless public meetings, written letters to all levels of government, signed our private lands, repeatedly reported violations to law enforcement authorities and have made scores of personal contacts with OHV riders in the Edwards Bowl area. The problems of OHV trail proliferation continue unabated. Signs are continually defaced or removed, riders continue to blaze new trails on sensitive lands. BLM has not managed this area--either to close it or to enforce the route designation. Obviously it is impossible to control route proliferation in this area which has literally thousands of routes, hill climbs, racetracks and bowls and has never been

WEMO comments P2

relinquished by the OHV riding public. We request that the Edwards Bowl area either be closed to all motorized vehicle use or acknowledged as a riding area and managed as such with full-time law enforcement presence on the weekends.

In addition, We would like to offer the following comments:

1. All lands in the El Mirage Valley DWMA should be limited to street-legal vehicles--Alternative D.
2. Use the "CLOSED unless marked OPEN" policy of signing routes.
3. CLOSED routes should be restored, signed as CLOSED and patrolled by BLM law enforcement personnel.
4. If non-compliance with the route 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 use 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.
9. There should be a ban on all shooting within the DWMA's.

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,

  
P.O. Box 871 Adelanto  
27274 El Mirage 92301  
Blanco Rd.

K.R. Stevenson



# BADGERS MOTORCYCLE CLUB

TO WHOM IT MAY CONCERN,  
RE: WEST MOJAVE PLAN

I REPRESENT A GROUP OF EIGHTY ONE MEMBERS OF THE BADGERS MOTORCYCLE CLUB, WHICH IS PRIMARILY MADE UP OF POLICEMEN AND FIREMEN FROM SOUTHERN CALIFORNIA.

WE STRONGLY OPPOSE THE CURRENT WEST MOJAVE PLAN IN ITS PRESENT STAGE.

THERE NEEDS TO BE AN EXTENTION OF THE COMMENT PERIOD FOR THE PLAN SO EVERYONE'S VOICE CAN BE HEARD. THERE IS TOO MUCH AREA BEING CONSIDERED FOR CLOSURE, AND UNTIL A DECISION IS MADE ALL ROUTES SHOULD REMAIN OPEN.

THERE IS AND HAS BEEN TOO MUCH BAD SCIENCE ACCEPTED WHEN IT COMES TO THE DESERT TORTOISE, AND NO GOOD METHODOLOGY TO DETERMINE WHICH DESERT ROUTES SHOULD REMAIN OPEN OR CLOSED.

OFF HIGHWAY VEHICLE USERS CONTRIBUTE TOO MUCH FEDERAL TAX DOLLARS TO BE SHUT OUT OFF THE RIDING AREAS, AND THE DECISION MAKING PROCESS. WE ALSO NEED MORE PUBLIC COMMENT MEETINGS HELD IN THE LOS ANGELES AND ORANGE COUNTY AREAS SO MORE OHV USERS CAN HAVE INPUT.

PREVIOUSLY THERE HAS BEEN TOO MUCH SPECULATION AND NOT ENOUGH ACTUAL FACTS ACCEPTED WHEN IT COMES TO THE WEST MOJAVE PLAN. WHAT IS NEEDED ARE OBJECTIVE OPINIONS AND ANALYSIS, NOT PRESSURE FROM A VOCAL MINORITY WHOSE AGENDA IS TO CLOSE DOWN ALL LAND TO THE PUBLIC.

RESPECTFULLY SUBMITTED,  
JAY T. WICKERS  
P.O. BOX 6550  
PINE MOUNTAIN CA.  
CALIFORNIA 93222

9/9/3

West Mojave Plan

I would appreciate it if the you could extent the time for submitting comments by three month. There simply has not been enough time to review the entire plan, compare all the alternative, research statements that seem questionable, and examine the maps to see if I have information about any of the routes. It would also seem appropriate to have additional public comment opportunities more readily accessible to those of us who live in the San Gabriel Valley. It was just not opportune to go the meetings when they were held at a considerable distance from where I live.

The arbitrary closing of existing routes just because there were parallel does not seem justified. The destination is usually not the reason that I engage in motorized recreation in the desert. The routes that I enjoy are not necessarily the same as those that others enjoy even though they start and end in the same place. Consideration should be given to the differences in user preferences when designating routes. It is simply not true that one size fits all.

I would like to see a complete route inventory. Apparently, route identification in twelve of the regions is based on an inventory that did not include single track trails. Considering only routes suitable for four wheel vehicles considerably limits the recreational experiences that should be available to those of us riding motorcycles.

Please do not place speed limits other than Basic Speed Law on riders of dual sport events. Others riding in the same area at the same time would not be subjected to speed limits. There doesn't seem to be a good reason to single out the dual sport riders. I believe that no tortoises have been killed by dual sport ride participants. I participate in a couple of dual sport rides a year and I find that the seemingly purposeless speed limits greatly diminish my enjoyment.

Put the Barstow to Vegas corridor back into the route inventory. Just because it was not included in NEMO-does not justify excluding it now. I was one of the District 37 people who helped layout the course for all the years it was run in the 1980's. I'd like to have to opportunity to do that again.

Establish C routes in the Cinnamon Hills. I have put on enduros in the past that used that very desirable area. Alternative E suggests this use of the area.

Jerry Bailey



1316 S Siesta Av  
West Covina, CA 91790

164

03 SEP 11 AM 11:57

03 SEP 11 AM 11:57

POST OFFICE DISTRICT  
HESPERIA, CA.

9/10/03 FROM:  
18527 Damon Drive  
Hesperia, CA 92345

To:

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

Gentlemen:

You have received detailed comments from the Mojave Group, Sierra Club, which we as members support.

We have brief personal points for your consideration:

1. Your plan notes that some deaths of the Desert Tortoise are due to crushing by vehicles, and we would like you to arrange to minimize that in the few remaining areas where they have dense populations, along with notices to leave them undisturbed.
2. We note random target plinking remains as we travel across the desert, leaving shot up cans or worse, broken glass behind. We would like to limit the impact and the possible shooting hazards of random plinking to bystanders to defined areas, so the rest of the desert is bullet free.
3. Vehicle routes defined as closed should have roadblocks or vertical mulching to discourage random rambling across the land, as you have a defined vehicle route network for desert access. Of particular concern is preventing new offroad rugged terrain hillclimbs which result in spectacular erosion of desert soils, as there are defined areas for this purpose already.
4. In the Arrastre Canyou, Juniper Flats subregion, we would like to promote areas for safe picnicking, dayhiking, horseback riding without frequent competition from offroad motorcycles and cross country jeeping. The Mojave Group would like to work on a signing or picnic area project to promote this.

Thanks for your consideration,

*John H Kindsvater*

*Ellen P Kindsvater*

John H and Ellen P Kindsvater

03 SEP 11 AM 11:58

DISTRICT  
PERSIDE, CA.

15457 Eto Camino Road  
Victorville, CA 92394  
September 9, 2003

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

.....  
**Subject: WEMO COMMENTS**  
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The BLM has been given the role of stewardship over our public lands- a very difficult responsibility in the Mojave Desert, but one **which requires the conservation of these lands and the management of activities within these lands.** There must be a careful balance of activities and protection of resources, so that the public can enjoy these natural treasures and still provide adequate habitat for desert species.

DWMA's must be given a high degree of resource conservation and less access to potentially damaging activities. These are areas **where wildlife must be considered first.** There should be no increased routes in these special management areas.

There is inadequate mitigation for loss of habitat in the proposed ratio of 1/2 acre for 1 acre of taking of disturbed land. This is insufficient to adequately preserve habitat, as it represents a 50% loss. Disturbed land can still constitute important habitat, especially with encroachment of urban areas further and further into desert.

The Bureau of Land Management must have an enhanced budget to make the plan work. More presence, enforcement and monitoring is essential in use areas. There is a need for more plant and wildlife surveys and public education for desert users. Additional funds are also needed for projects such as invasive plant eradication and route closures.

The plan does not fully implement the Desert Tortoise Recovery Plan, which is a big part of California Desert Conservation Plan.

While emphasizing route designation for OHV recreational use, WEMO fails to consider the other recreational uses. Equestrian

Pisgah Crater is unique, and, according to BLM documentation, is an uncommon landform. A portion of this area should be designated as an ACEC due to the resources of this landmark. The several different types of lava tubes, which provide bat roosts, the fringe-toed lizards, which play in the white sands, the crucifixion thorn, the white-margined beardtongue and the sand linanthus, make this spectacular area one which should be managed to protect it for public visitation and enjoyment.

### Juniper Flats Sub Region

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This special area on the northern foothills of the San Bernardino Mountains interfaces with the rapidly growing population of the Victor Valley, therefore, an appropriate and effective conservation plan must be put into place as soon as possible, but due to the complexity of the natural resources, the various recreational and commercial uses, the private land interests, and the proximity of local cities and their interests, it seems imperative that this area becomes a separate unit for management planning, similar the El Paso unit near Ridgecrest. This planning should be the collaborative effort of all interested parties and stakeholders to insure community involvement in the process. This spectacular area with significant riparian areas and wildlife that depends on them has been neglected over the years and now needs a comprehensive plan that includes protection and a variety of recreational uses.

#### Riparian Areas:

90% of California's riparian areas have vanished or been ruined due to human activities, so all riparian areas are resources that must be protected and enhanced. In the Juniper Flats/Arrastre Canyon area this is especially true, being in an arid, subjected to severe periods of drought. This mountain area contains beautiful boulder fields, washes, springs and seeps, riparian habitat and steep, granitic hills and is critical habitat to birds and many species of wildlife and plants. There should be no routes into these areas and where necessary, fencing must be used to protect them from damaging trespass of vehicles or grazing.

#### Threatened and Endangered Species:

This riparian habitat is in a migration corridor for the Southwest Willow Flycatcher. The Least Belts Viero, which is federally listed as endangered and the Grey Viero, which BLM has designated as sensitive, are also in this area, as well as the Parish's Daisy (*erigeron parishii*), federally listed as threatened. This plant is located in limestone mining areas of the San Bernardino

Mountains, and is declining due to a thin layer of this limestone dust that forms on the surrounding land and hardens into a cement-like substance which renders potential habitat unsuitable for the species. However, this plant has been located in the Arrastre Creek area near Round Mountain. Due to the decline in other areas, this area could be a potentially important habitat for this species. Current surveys are needed for this region.

#### Recreation:

While the large majority of users of the sub region are recreationists other than OHV users, the plan only addresses OHV recreational use, which limits the enjoyment of the other users, who are looking for quiet, solitude, wildlife and bird viewing, hiking and equestrian trails and photography opportunities, which are not always compatible with the noise, dust and company of motorcycles. The area must have a very sensitive designation of routes to minimize the conflicts and increase public safety for the many varied users. There is a need for equestrian and hiking trails, which should be distanced from OHV trails and in some spots it may even be advisable to separate single track from double track routes. Arrastre Canyon is more suitable for equestrian and hiking trails and habitat for wildlife and the 73 species of birds in the area than for OHV use.

#### Route Designation:

Routes that are closed must be rehabilitated to not look like routes. In some areas this will require more effort than others, from the placement of berms or rocks, revegetation with native plants, pitting, seed dispersal, to vertical mulching and other extensive methods. Some kind of reclamation to obliterate the routes must take place to prevent trespass. These types of projects lend themselves to volunteer programs.

Although there have been some closures of routes entering riparian areas, there are others going closer than 1/2 mile, especially in Arrastre Canyon. These routes also need to be closed. It is necessary for BLM presence in these areas to adequately monitor use activities. While many people can follow rules voluntarily, many need some coercive guidance. The rules must be followed if the plan is to work. The routes need to provide connectivity to the Forest Service routes and to other destinations in a way that does not threaten the area resources. If adequate monitoring and enforcement cannot be provided to prevent resource damage, the area should be closed until a plan to correct the problems can be established.

#### The Juniper Flats ACEC:

The Juniper Flats ACEC has a management plan which has

provided a parking area for visitors to the Cottonwood Springs area and fencing to protect the springs, which are very important to wildlife which is still recovering from the Willow Fire. This area also has Native American ancestral sites. However, after the Route Designation EA was published a formally illegal route going directly through the ACEC and also through the cultural and burial sites and very near the riparian area was added as an open route in the Record of Decision. This was a great surprise to the people who had commented on the route designation. This route, J1299, is not necessary for connectivity and should be closed as it is not compatible with the ACEC. Juniper Flats Road provides a route to J1003 and on to USFS land. Impacts of the route would damage these sites by surface erosion, burial by sediments and looting. These sites are recorded for future study and should not be damaged by OHV use. The vehicle traffic so near the Cottonwood Springs area would also be a harassment of the recovering wildlife.

**Round Mountain Grazing Allotment:**

The WEMO plan does not limit this allotment to the current winter grazing. This area has not recovered from the Willow Fire and grazing will likely increase the growth of the exotic grasses, while decreasing the re-establishment of the native bunch grasses and native shrubs. This area is currently covered with dry fiddleneck, which is not eaten by cattle, but represents a fire hazard along with the exotic grasses. There should be no grazing if the above-ground ephemeral forage goes below an acceptable level. There should be no grazing intrusion into riparian areas and there should be no extended months of grazing as this is still in recovery from the fire. Conditions of allotments need frequent evaluation.

**Conclusion:**

I strongly support the Juniper Flats Sub Region becoming a separate planning unit with the collaborative involvement of the community stakeholders. My vision for this area is a primitive multi-use area where families can hike or picnic and the public can enjoy a variety of activities in an area with a wild look and an opportunity for solitude.

Sincerely,



Carol Wiley

September 8, 2003

Mr. Bill Haigh, Project Director  
West Mojave Plan  
Dept. of Interior, BLM  
22835 Calle San Juan de los Lagos  
Moreno Valley, CA 92250

Dear Mr. Haigh,

As a frequent visitor to lands in the proposed DWMA, I note the various restrictions to be imposed on the landowners as well as the possible benefits laid out in the WEMO EIR.

Due to the restrictions on lot size and the requirements to pay a 5 to 1 mitigation fee, investments in desert lands will be seriously affected, undoubtedly impairing chances of realizing a profit from investments. These desert lands now might have value only as remote homesites where nature-loving people, willing to live with no planned provisions for power or water, could build.

There are serious threats to the quality of life in the rural desert area. Among them are shooting, vandalism and off-highway vehicle impacts.

As noted in the WEMO EIR, intentional shooting has been a significant factor affecting the tortoise, ferruginous hawk and other rare species. Shooting is also unsafe, an unwelcome intrusion into the quality of life and contributes to the further destruction of cultural and natural resources on public and private lands. We support a total ban of all shooting within the DWMA's. As noted in the EIR, this will aid in the enforcement of existing laws by law enforcement personnel.

Regarding off-highway vehicle (OHV) use, we are pleased that BLM is designating routes. However, these routes must not cross private lands without permission from the owner. Below are the ID numbers of just a few of the routes which are designated as OPEN into private land:

- EM 1046--OHV trail crosses private land.
- EM 2002--this is a "de facto" open route as it crosses into private land in Section 19.
- EM 2012, 2078--invites trespass into private Section 5.
- EM 1007, 2082, 2085--invites trespass into private Section 9.
- EM 1131--invites trespass into private section 14
- EM 1046, 1069--invites trespass into private Sections 13, 25.
- EM 1187, 1014--invites trespass into private Section 21.
- EM 1078--invites trespass on private Sections 1, 5 near Red Buttes.

The routes in Section 2 of Township 7 North, Range 7 West and Sections 25, 26, 27, 34, 35, 36 of Township 8 North, Range 7 West are in the El Mirage Plan's "zone of influence" and may be traversed by licensed vehicles only. Further, these routes have been illegally created since the El Mirage Plan was put into effect in 1990 and should not be open to OHVs as they invite trespass and route proliferation in the DWMA from riders coming north from the El Mirage OHV park.

The El Mirage Plan was to draw OHV traffic into the El Mirage OPEN area. Millions of dollars have been spent to provide a 40 square mile OHV OPEN area, but riders continue to cross through the "zone of influence" and ride into the Edwards Bowl area. Routes leading north from Shadow Mountain Road should be signed as "Closed" to unlicensed Green Sticker vehicles per the El Mirage Plan. User fees to ride at the El Mirage OHV park should never be instituted.

The proposed WEMO EIR treats OHV use in the Edwards Bowl area as an afterthought with the issues of OHV trespass, safety, residents' quality of life, and trail proliferation being addressed "to the extent

WEMO comments page 2

possible" (table 2-23). This is unacceptable to us. We have participated in public meetings, written letters to all levels of government, helped sign private lands, reported violations to law enforcement authorities and have assisted in making personal contacts with OHV riders in the Edwards Bowl area. The problems of OHV trail proliferation continue unabated. Signs are continually defaced or removed, riders continue to blaze new trails on sensitive lands. BLM has not managed this area--either to close it or to enforce the route designation. Obviously it is impossible to control route proliferation in this area which has literally thousands of routes, hill climbs, racetracks and bowls and has never been relinquished by the OHV riding public. We request that the Edwards Bowl area either be closed to all motorized vehicle use or acknowledged as a riding area and managed as such with full-time law enforcement presence on the weekends.

In addition, We would like to offer the following comments:

1. All lands in the El Mirage Valley DWMA should be limited to street-legal vehicles--Alternative D.
2. Use the "CLOSED unless marked OPEN" policy of signing routes.
3. CLOSED routes should be restored, signed as CLOSED and patrolled by BLM law enforcement personnel.
4. If non-compliance with the route 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 use 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.
9. There should be a ban on all shooting within the DWMA's.

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,

A handwritten signature in cursive script that reads "Molly Barnett". The signature is written in dark ink and is positioned below the typed name "Molly Barnett".



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CRAIG OWEN  
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September 8, 2003

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

I write to you today to express my concern of the lack of public disclosure and due process regarding the changes that have been made and those that are being proposed. It is important that the period for public comment be extended. A ninety day period is too short a timeframe for the public to digest a document of this magnitude and verify sources quoted in the DEIR/S.

Secondly, I am disturbed that no public meetings were held in the Los Angeles Basin. Nor were the meetings held outside the LA area properly advertised to allow for those in the LA area, which represent a large portion of the public that recreate in the Mojave area to attend. It is imperative that at least two meetings be held in the Los Angeles basin.

In closing, I urge you to re-evaluate The West Mojave Plan. Keeping public lands open to the public is important. Restricting my right to recreate with my family on public lands is unconstitutional.

Please add me to your mailing list so that I may be kept updated on pending actions, updates and future plans.

Respectfully,

A handwritten signature in black ink, appearing to be "Craig Owen". The signature is fluid and cursive, with a long horizontal stroke at the end.

Craig Owen

Dear Sir,

Sept 7, 2003

I am greatly concerned about the negative impact of the west Mojave plan because it affects my family in a big way. We have been using this area for our activities and recreation for 20 years and I want this area to remain completely open so I can enjoy my chosen form of recreation.

We need to extend the comment period (nearly 2 days is not enough time) The public needs more time to understand this document. We also need to have a public meeting held in the Los Angeles Basin where we all live.

The area that is allotted for the Desert Tortoise seems to me to be more than enough. I personally recommend only one large D.W.M.A. as described in ALT. E. I like the head start program of captive breeding to replenish the Tortoise population at Fremont Valley. Am sure if the Raven Population was brought under control the Tortoise recovery program will be successful. This bird is not a native bird, and again any fencing of tortoise areas only provides a perch for ravens to prey upon the Tortoise.

A concern for me of the twenty three sub regions only eleven were fully surveyed and the other twelve relied on the 1985-1987 survey, which contained no single track trails. I don't think the public should because the BLM did such a poor job. On Route inventory I want to see a complete survey.

OVER

I also want to make sure the Johnson to Parker and Johnson to Stoddard race corridors are shown as open routes. We need specific language to allow continued use of corridors for competitive events. I want all C trails to be reopened at spangler open areas; this was only suppose to be temporary. I want to make sure that the fremont recreation area as described in ALT E be created as mitigation for loss of recreational opportunity due to route closures.

I'm sure the Economic Impact on California would be very negative if all of this passes.

The DEIR's to me violates NEPA by failing to "devote substantial treatment to each alternative considered in detail so that reviewers may evaluate their comparative merits". There is no documentation provided in the administrative record indicating the methods or documentation provided in the administrative record to determine which routes would be closed with no scientific justification for closure.

Larry Hall

4601 Cherry Ave

Long Beach, CA  
90805

(562) 422-0363

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Jimmy Lewis  
1943 Republic Ave.  
Costa Mesa, CA 9227

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

September 7, 2003

### Proposed West Mojave Plan (WEMO) COMMENTS

I am submitting my comments for the WEMO in hopes of making a difference this time. As a person who enjoys using our public lands for recreation, I was disappointed that none of my submitted comments were included or acknowledged in the route planning process that took place prior to the WEMO. So, in my opinion, the WEMO is flawed to begin with.

I submitted specific route comments on a few sub-regions; specifically noting that there were very few documented "Single Track" trails on the maps, though they existed on the ground. I have been using these trails for many years and they have never been signed. Though originally these areas were designated "open" and later "Limited", these areas are now managed in a "closed unless signed open" manner. The routes were overlooked in the original mapping done for the 1980's California Desert Access Guide Maps. On these maps single track trails were not even noted. Used as the base for the current Travel maps, most single track trails were left out because it is obvious very few ground surveys were done, especially with an eye for single track trails. Public input was then used to gather (hopefully) what would be a complete route inventory. In the instances where individuals supplied this input, non-scientific route elimination went on claiming "Duplicate Route" shutting down routes based solely on the area that they started and ended with no consideration for route difficulty or visitor experience. Furthermore there is no consideration for increased impacts on the remaining trails, which will deteriorate more quickly due to increased use. This in turn may cause route deviance, which is exactly what we don't want. Plus trails that have been used for many years by good, law-abiding citizens are shut off for unexplained reasons (duplicate route doesn't cut it when you roll up to a red stake on your favorite trail) and users may decide to ignore the signage. Which seems to be a noticeable problem even by the latest BLM studies. Even a California OHV Guidebook published in 1991 is very outdated due to the proliferation of route closures and there has been zero effort to replace (or mitigate) any of the lost opportunity.

Also shouldn't it be the job of the BLM to properly identify the route inventory? Calling on the public is a great idea, but most of us have jobs as well. With the current trend to view environmentalism as "good" and multiple use, specifically OHV use as "bad" it seems much safer for the BLM to eliminate routes to "protect" endangered species when science shows that this is one of the factors producing the least impact on the species. There isn't even a mitigation process outlined for the many lost miles of trails. There isn't an outlined process for creating new trails or replacing ones that become too damaged from over use.

One more very important thing to consider when considering comments to the WEMO and its alternatives. It is a **recreational activity** for environmental interests to protect or close down public lands to multiple use. Multiple use groups' **recreation is to go outside and enjoy public lands in a responsible manner**. So it is very hard for most to sit down and write comments when there still is a wonderful desert to enjoy. Scientifically speaking (at least as much as went into deciding which routes to close down) you will receive very few comments or input from multiple use interests percentage wise than you will form the well backed and highly funded environmental causes. Then they will sue you (and maybe me too) to further turn the BLM into a bureaucratic institution who can't manage the lands for fear of the formalities it requires. All it takes is a look at the statistics on the visitor use days to see the overwhelming number of people that recreate in the desert by mechanical means to see that declining recreation opportunities for OHV use is a roadmap for disaster. This is not what anyone wants, especially the environmental interests, though they seem set on the option that complete elimination of OHV use as the only alternative.

Some more points that seemed to be overlooked:

-The route designation process was failed and rushed.

-The comment meetings (especially those for the route planning) were not held in areas where the population base that uses the lands is contained, i.e. The Los Angeles basin making it difficult for many interested people to attend them.

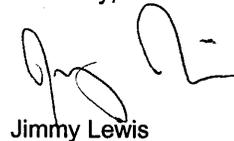
- The CD ROM that was included for viewing of the maps is extremely difficult to use and necessitated actual full sized maps to make any sense of the routes included.

- The studies sited, especially concerning tortoise information are subjective and very anti-OHV. Especially concerning the damage sited in competition events and the healing time required for the areas is overstated and slanted to impress the reader that OHV competition events cause, without exception, permanent damage. Try and find old Barstow to Vegas or Parker race courses. You can't! Especially in areas that are (like most of the course) power transmission corridors where continued disruptive activity continues, there have been very few (if any) follow up studies to show that the reports sited are flawed. It is even sited in the studies that race monitors (often BLM rangers) may be responsible for some of the off-trail disruption, yet the study pins all the blame on the racers and the event.

These are only a few of the many disagreements I have with the proposed alternatives. All have fatal flaws most revolving around the incomplete mapping for the route designations and travel plans.

I hope that these comments will be taken into account during the final WEMO decision making process. I expect to be put on the list to receive the final decision where, hopefully this time, my comments will make a difference.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jimmy Lewis', with a stylized flourish at the end.

Jimmy Lewis

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9/9/03

WEST MOJAVE PLAN

22835 CALLE SAN JUAN DE LOS LAGOS

MORENO VALLEY, CA 92553

ALL BLM PARTIES CONCERNED:

I AM WRITING AS A MOTORIZED RECREATIONIST THAT IS CONCERNED ABOUT THE FUTURE OF THE WEST MOJAVE AREA. I HAVE BEEN RECREATING IN THE AREA FOR ALL OF MY 32 YEARS. THUS IT IS AN IMPORTANT AND SPECIAL PLACE FOR ME. I AM THE PRESIDENT OF A GROUP CALLED THE BPMC. I AM WRITING ON THE CLUBS BEHALF AND REPRESENT 150 PLUS ENTHUSIASTS WITH SIMILAR CONCERNS. OUR CLUB IS COMPRISED OF PRIMARILY OFF ROAD MOTORCYCLIST WHO ENJOY TRAIL RIDING, EXPLORING, SIGHT SEEING, COMPETITION AND DUAL SPORTING.

OUR FIRST CONCERN IS THE ALLOWED COMMENT PERIOD. WEMO IS A COMPLICATED MASSIVE PLAN AND MORE TIME IS REQUIRED FOR ALL CONCERNED INDIVIDUALS TO COMMENT. PLEASE

EXTEND THE COMMENT PERIOD. WE BELIEVE THAT THE GENERAL PUBLIC WAS NOT GIVEN AMPLE NOTICE OR OPPORTUNITY TO ATTEND MEETINGS TO BECOME EDUCATED ON THE PLAN. THIS MUST BE ADDRESSED BEFORE SUCH A FAR REACHING PROGRAM IS IMPLEMENTED.

MOTORIZED RECREATIONALISTS - SUCH AS OURSELVES ARE CONCERNED WITH HABITAT PROTECTION, ENJOYING THE ENVIRONMENT IS THE MAIN REASON FOR RECREATING IN THESE AREAS. HOWEVER, OUR METHOD OF RECREATION ALSO DICTATES THE AVAILABILITY OF A QUALITY TRAIL NETWORK. WE ARE VERY CONCERNED THAT THE QUALITY OF TRAILS = WILL BE SIGNIFICANTLY REDUCED BY THE PROPOSED PLAN. WE BELIEVE THAT THE BLM'S TRAIL INVENTORY IS INCOMPLETE AND MUST BE UPDATED. INCLUSION OF MANY SINGLE TRACK TRAILS IS OF UPMOST IMPORTANCE. FROM OUR FINDINGS, THE AMOUNT OF SINGLE TRACK TRAILS IS LACKING.

WE WOULD ALSO REQUEST THAT TRAIL INVENTORY MAPS BE MORE ACCESSIBLE AND USER FRIENDLY. THE INCLUDED CD MAPS ARE APPRECIATED, BUT WILL DEFINATELY REQUIRE A LONGER COMMENT PERIOD TO DELIVER.

WE APPRAISE THE RECOGNITION OF MOUNTAINOUS AREAS AS BEING MORE CONDUCTIVE TO MOTORIZED RECREATION. HOWEVER QUALITY TRAILS SHOULD ALSO BE INCLUDED IN BAJADA AND LESS THAN 20% SLOPE AREAS. WHICH BRINGS US TO THE SUBJECT OF VOLUNTEER TRAILS: AS FAR AS WE CAN TELL, THERE ARE TWO REASONS THAT VOLUNTEER TRAILS ARE CREATED. 1) THERE APPEARS TO BE NO OTHER ROUTE TO GET TO A CERTAIN LOCATION, 2) THE DESIGNATED OPEN ROUTE IS FLAT AND WIDE AND OFFERS NO CHALLENGE TO THE RIDER. FOR THIS REASON, PASSAGES THROUGH THESE ACEC'S, RWMA'S AND OTHER TORTISE HABITATS SHOULD NOT BE RESTRICTED TO ONE TYPE OF TRAIL. IF ADJACENT

(REDUNDANT?) TRAILS OFFER 1 (4)  
ROUTE FOR ATVS & 4X4'S AND  
ANOTHER FOR M/C'S THEN THEY  
SHOULD BOTH STAY. IN OTHER WORDS  
IN ORDER TO CONTROL VOLUNTEER  
ROUTES, OPEN ROUTES SHOULD APPEAR  
TO ALL USERS, OF ALL SKILL  
LEVELS. AN M/C RIDER SHOULD  
BE ABLE TO TRAVERSE SECTIONS  
ON NARROW TWISTY UNDULATING,  
ENJOYABLE ROUTES INSTEAD OF  
BEING FORCED TO RIDE MILES  
OF DIRT ROAD WHICH WILL ENCOURAGE  
VOLUNTEER TRAIL PROLIFERATION. SINGLE  
TRAIL OPPORTUNITIES ARE VERY  
IMPORTANT. KEEPING THEM OPEN  
IN MOUNTAINOUS & BASADO AREAS  
WITH OBVIOUS SIGNING WILL  
GO A LONG WAY TO CURB ILLEGAL  
CROSS COUNTRY RIDING.

CHAPTER 2 PAGE 138 STATES "A  
ROUTE WAS CLOSED IF ITS  
CONTRIBUTION TO RECREATIONAL  
OPPORTUNITIES WAS BETTER MET  
BY RECREATIONAL OPPORTUNITIES  
IN OTHER AREAS WITH LESS  
TORTISE SIGN OR HABITAT OF LESSER  
QUALITY. HOW IS IT DETERMINED  
THAT RECREATIONAL NEEDS ARE MET

OR NOT? FOR ALL USERS? (5)  
CHAPTER 2, 2.6.8 ALSO  
STATES IMPLEMENTATION OF  
ONLY OPEN ROUTES NONE POSTED  
CLOSED. I AGREE WITH THIS  
SO LONG AS TRAIL OPPORTUNITIES  
ARE ADEQUATE. WE DO NOT HOWEVER  
SUPPORT THE NOTION OF CLOSED  
UNLESS POSTED OPEN.

CHAP. 2-146 - STATUS THE YORK  
ROCK RAKE WILL BE USED TO  
SHAPE, CLEAR & CONTOUR ROUTES.  
IF THIS PRACTICE IS OVERDONE,  
IT WILL CREATE CHALLENGELESS  
FLAT ROUTES THAT WILL AGAIN  
ENCOURAGE VOLUNTEER ROUTES.

GENERALLY WE FEEL THAT TRAIL  
OPPORTUNITIES NEED TO REMAIN DIVERSE,  
INTERESTING AND APPEAL TO A RANGE  
OF VEHICLES AND SKILL LEVELS,  
IN ALL AREAS. IF THIS IS TRULY  
ACCOMPLISHED, (WE FEAR IT WILL NOT  
BE) VOLUNTEER ROUTES WILL DECREASE  
DRAMATICALLY.

SPECIFICALLY WE ARE WORRIED ABOUT  
THE PLANS FOR THE RAND MOUNTAINS.

IT SEEMS THAT THE MOUNTAINOUS TERRAIN IS NOT SUITABLE FOR TORTISE HABITAT, HOWEVER, SIGNIFICANT RESTRICTIONS ARE BEING PLACED ON THE AREA. CHAPTER 3 PAGE 8 STATES THAT THE ACEZ WOULD INCREASE BY 13,120 ACRES, THE USE CLASS WOULD BE REDUCED FROM M-L, THE ENTIRE MANAGEMENT AREA EXCEPT FOR 129 MILES OF DESIGNATED OPEN ROUTES WOULD BE CLOSED. WHAT HAPPENED TO THE ROUTES THAT WERE CLOSED IN THE INTERIM CLOSURE, SHOULDN'T THOSE BE RE-OPENED SINCE THE RECORD OF DECISION HAS BEEN RECORDED. ON TOP OF ALL OF THESE NEW RESTRICTIONS, THERE WILL ALSO BE A PERMIT SYSTEM? IS ALL THIS NECESSARY IN MOUNTAINOUS AREAS NOT SUITABLE FOR TORTISE HABITAT? WE THINK IT IS NOT.

IN CLOSING, WE ARE ALL FOR PROTECTING THE HABITAT, BUT IN ORDER FOR IT TO BE FAIR AND EFFECTIVE, USE LEVELS AND QUALITY OF TRAILS MUST BE MORE CAREFULLY CONSIDERED

AND REPRESENT THE TRUE (7)  
IDEAS AND DESIRES OF US,  
THE MOTORIZED RECREATIONALISTS.

THANK YOU

JEFF LEONARD  
212 AVENIDA CABRILLO ART B  
SAN CLEMENTE, CA  
92672  
(949) 498-8269  
CEOBPMC@AOL.COM

Lorraine Drenten  
11136 Allegheny St.  
Sun Valley, Ca

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

September 9, 2003

A response to the West Mojave Plan proposals:

As a family we greatly enjoy the use of the West Mojave area for camping and riding. The ability to spend quality time here, in what has been a relatively safe environment, has been appreciated. Our experience includes taking friends on "first rides" to turtle reserve. What a great way to introduce youth to both the sport of riding and to the learning environment of nature and the desert. What is not appreciated is the erratic and seemingly single sided decision making process.

Let me start with the "Tortoise". The current process does not seem to provide the evidence and structure for sound decision making. There are options to recommendations made that include opportunities to balance the needs of various interests without, so to speak, "closing the door". To begin with the BLM needs to consider development and implementation of a "head start" program of captive breeding to replenish the tortoise population at Fremont Valley. Additionally, as the riders are not the 24/7 culprits made out to be, the raven population, which has free and uninhibited access to the tortoise needs to be brought under control. {Note: if the West Mojave Plan were truly organized, documented in accordance with law, and structured to include a fair and equal representative sample of concerns, we would know exactly how many tortoise are killed by ravens, by the accidental impact from a bike (none are known!) and from poachers (which aspect does not appear to be addressed by the plan)}. Establish a bounty on the raven to bring the population under control. Do not implement the fencing recommendations in the DEIR/S as the fencing will only provide a perch site for the ravens.

It is a challenge to accept the DEIR/S as much of the documentation supporting it was not published nor was there a peer review process – to ensure quality and fairness. This is not the foundation for solid decision making, or good science and does not support the one sided approach to route closure and motorized recreation bans is not the only answer (as it seems the unsupported theme of the DEIR/S indicates).

It appears to me that enough land has been allowed for the tortoise population until such time that accurate and validated data is available and can be relied upon to make well thought out (not impulsive, emotional, or speculative) decisions.

West Mojave Plan  
Comment on WEMO  
Page 2 of 2 09/10/03

Until such time as a complete, accurate, quantifiable and verifiable analysis is completed – All routes should be considered open unless signed closed (signs meeting previously established guidelines).

I am also surprised at the lack of public opportunity to participate in the decision making process. As I know it, there were no public meetings in the Los Angeles basin. In that this is where my family and our riding friends reside and it appears that so many of those that ride in the desert reside it seems unconscionable to make a decision without involving this segment of the riding population. You need to add at least two, if not three, meetings to the process and they need to be held in the Los Angeles basin.

Additionally, the time period for comment and response is inadequate. This is a significant undertaking and should have an appropriate response and comment period. The comment period, following adequate and appropriate notice should be extended a minimum of 90 to 120 days. This would, at a minimum, be a showing of good faith vs. the apparent push to complete in favor of one set of interested parties.

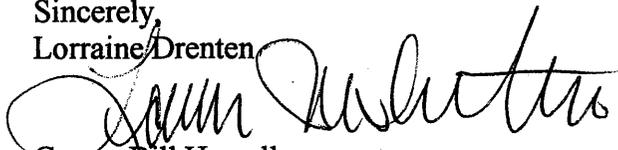
In summary, it appears that the DEIR/S violates the National Environmental Policy Act by failing to “provide a clear basis for choice amongst options.” Alt A through E offer the same redesign networks in tortoise critical habitat and ‘adopt existing designated networks elsewhere.’ Alt. G provides for no change to existing network. The following two options are requested:

1. Do not reduce the number of routes until closures are determined on a case by case basis and that any proposed closures are supported by a site specific analysis (quantifiable) to determine detrimental effects, if any. Consider other mitigating measures, besides closure, prior to closure and as a part of the site-specific analysis. This process must be documented.
2. Route networks should be developed to provide for at least two alternatives, selected from existing routes. The alternatives proposed do not provide an opportunity for choice.

Thank you in advance for your attention to these matters.

Your democratic attention to these issues will be appreciated.

Sincerely,  
Lorraine Drenten



Cc: Bill Howell  
D-37 WEMO Coordinator  
9598 Meadow Street  
Rancho Cucamonga, CA 91730-5656



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Boron, CA 93516-2000  
telephone (760) 762-7000

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

September 9, 2003

Re: Draft Environmental Impact Report and Statement for the West Mojave Plan

Gentlemen:

U.S. Borax Inc., Boron Operations is located in eastern Kern County, within the planning area covered by the West Mojave Plan. The Draft Environmental Impact Report and Statement for the West Mojave Plan has been reviewed by Boron Operations staff and consultants. We would like to offer the following comments to facilitate delineation of the North Edwards Conservation Area, as proposed in the Draft Environmental Impact Report and Statement.

The lands identified as the North Edwards Conservation Area are of particular concern to U.S. Borax. The North Edwards Conservation Area is proposed to provide protection for the desert cymopterus and the Barstow woolly sunflower, acquire conservation easements, conduct botanical surveys and adjust the conservation area boundaries based on survey results.

The North Edwards Conservation Area is included in Alternatives A, C, D, E and F of the Draft Environmental Impact Report and Statement. The northwesterly portion of the North Edwards Conservation Area incorporates Sections 29 and 30, Township 11 North, Range 7 West. U.S. Borax owns all of Section 29 and a significant portion of Section 30. The following biota information, specific to these lands, is provided to assist in establishing the initial boundary of the North Edwards Conservation Area.

At various times over approximately the past 10 years, surveys have been conducted for special-status species of plants and wildlife at the U.S. Borax, Boron Operations by Dames & Moore and Garcia and Associates (GANDA). During those surveys, no desert cymopterus or Barstow woolly sunflower have been found in Sections 29 and 30, or on any of the other areas surveyed.

Attached to this letter is a brief two page summary of the findings over the years related to sensitive plant species, with specific emphasis on the most recent surveys conducted in Sections 29 and 30. The most recent surveys were conducted in April and May 2000 in support of the Draft Environmental Impact Report for the U.S. Borax Life of Mine Project.

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West Mojave Plan  
September 10, 2003

As noted in the attached summary, approximately 6,290 acres have been surveyed in and near Sections 29 and 30 for special-status plants. All the surveys were scheduled to coincide with the year-specific flowering periods of the desert cymopterus and Barstow woolly-sunflower. Despite the extensive coverage of the area by well-qualified biologists, the desert cymopterus and Barstow woolly sunflower have not been found on Boron Operations lands.

Based on this information, we believe that it is very unlikely that either species occurs in Sections 29 or 30. Therefore, U.S. Borax requests that the boundary of the North Edwards Conservation Area be redrawn to exclude Sections 29 and 30, Township 11 North, Range 7 West.

Very truly yours,

A handwritten signature in black ink, appearing to read "Gregg Wagner", written over a faint, illegible typed name.

Gregg Wagner  
Environmental Manager

Attachment

**U. S. Borax Inc.**  
**Potential for Desert Cymopterus (*Cymopterus deserticola*) and**  
**Barstow Woolly-Sunflower (*Eriophyllum mohavense*) on**  
**Sections 29 and 30 (Township 11 North, Range 7 West)**

Surveys have been conducted for special-status species of plants and wildlife at the U.S. Borax Boron Operation since 1989 by Dames & Moore and Garcia and Associates (GANDA). During those surveys, no desert cymopterus (*Cymopterus deserticola*) or Barstow woolly-sunflower (*Eriophyllum mohavense*) have been found in Sections 29 and 30, or on any other part of the Boron Operation.

***Surveys Conducted in Sections 29 and 30***

Surveys in portions of Sections 29 and 30 were conducted during April and May 2000 (GANDA 2000). The 2000 surveys covered a total of 4,130 acres, including approximately 250 acres in the western half of Section 30 and 120 acres in the northwestern quarter of Section 29. The surveys also covered an additional 3,760 acres to the north and northwest of Sections 29 and 30.

Although the surveys were conducted for five special-status plant species (the other three were Mojave spineflower [*Chorizanthe spinosa*], alkali mariposa-lily [*Calochortus striatus*], and Parish's alkali grass [*Puccinellia parishii*]), the timing emphasized the potential for identification of desert cymopterus and Barstow woolly-sunflower. The flowering period for the former is March to May, while the latter flowers from April to May. Prior to the start of the 2000 surveys, contacts were made with biologists working in the region to assess the phenology of desert plants. Those contacted included Mark Bagley and Denise LaBerteaux, both of whom have conducted numerous surveys for special-status plants in the Mojave Desert. Based on such information, the surveys of the 4,130 acres were conducted during 18-21 and 24-28 April, and 2-4 May 2000, a time when both species would have been readily identifiable, if present onsite.

The surveys in April and May 2000 were conducted by a team of eight biologists, including four with extensive experience with desert plants and specific prior experience with surveys on the Boron Operation property. These individuals included Denise LaBerteaux, Tom Olson, Mike McGovern, and Ted Rado. All four have worked with desert botanist Mark Bagley, a noted expert on plants of the Western Mojave Desert. All eight biologists reviewed morphological characteristics, habitat requirements, and line drawings and photos of the special-status plants prior to the start of the 2000 surveys. The biologists walked parallel transects that were 30 feet or less apart, depending on terrain and vegetative cover. The pedestrian survey covered 100 percent of the sites.

Despite surveys being conducted highly qualified biologists during the 2000 season-specific flowering period for these two plants, no desert cymopterus or Barstow woolly-sunflower plants were found in Section 29 or 30. Characteristic stabilized dune habitat for the cymopterus is not present in either section. Similarly, no desert cymopterus or Barstow woolly-sunflower plants were found anywhere in the 4,130-acre survey area. The total acreage surveyed represented nearly six and a half square miles with no desert cymopterus or Barstow woolly-sunflower.

It should be noted that although not found in Section 29 or 30, one of the four special-status plants (Mojave spineflower) was found to be abundant in appropriate habitat elsewhere on the Boron Operation. More than 3 million plants were found during the 2000 surveys.

### *Other Surveys Conducted on the Boron Operation Property*

There have been other large-scale surveys for special-status plant species on the Boron Operation with similar results. In May 1992 and April 1994, surveys were conducted by Dames & Moore for special-status plants were conducted on 2,160 acres to the north and northwest of Sections 29 and 30 (see Appendix I within the U.S. Borax Inc. 1940 Acre Project Habitat Conservation Plan prepared by WZI, Inc. – 1998). Similar to 2000, the 1992 and 1994 surveys were conducted by well-qualified biologists, including Mark Bagley, John Chesnut, Denise LaBerteaux, Mike McGovern, and Hermi Hiatt. Known populations in the region were reviewed in the field to assess phenology, and the 1992 and 1994 surveys were conducted when desert cymopterus and Barstow woolly-sunflower were in flower.

Mojave spineflower was found during those surveys, but no Barstow sunflower or desert cymopterus. The 2,160 acres surveyed in 1992 and 1994 represented an additional 3.375 square miles of survey effort in the vicinity of Sections 29 and 30 with no desert cymopterus or Barstow woolly-sunflower being found.

### *Conclusion*

Overall, in surveys conducted between 1992 and 2000, 6,290 acres (nearly 10 square miles) were surveyed in and near Sections 29 and 30 for special-status plants. All the surveys were scheduled to coincide with the year-specific flowering periods of the desert cymopterus and Barstow woolly-sunflower. All surveys were conducted by teams of biologists with extensive experience with desert botany, and with specific experience with these two species. Despite the extensive coverage (more than 1,700 miles of walking parallel transects) of the area by well-qualified biologists, the desert cymopterus and Barstow woolly-sunflower have not been found on U.S. Borax's Boron Operation. Based on such information, it is very unlikely that either species occurs in Sections 29 or 30 (Township 11 North, Range 7 West).

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9/8/03

To: Bureau of Land Management  
West Mojave Plan  
22835 Calle San Juan De Los Lagos  
Moreno Valley, Ca 92553

From: Cathey Smith  
Harper Lake Allotment  
39686 Hinkley Rd  
Hinkley, Ca 92347  
760-253-2732

2-112 (LG-1) to include table 2-17. The proposed utilization levels of 25 to 40 % are extremely low. This in turn will cause a lot of extra movement of cattle. I believe this would not only be detrimental to range health, but also will also decrease the health and well being of the cattle. From experience with the exclusion periods set by a past court decision cattle movement that is seasonally to early or increased impact during certain months causes extreme decrease in the productivity of both the cows and calves as well as the plant growth and health.

2-115. In reference to the biological opinion (1-8-94-F-17) would this be possible? Will you not be using a positive progression of care, or the facts that range health and the co-existence of cattle and tortoise have survived for many years in the past?

2-115 (LG-5). The two days would be quite impossible to achieve, contact and approval from BLM would require more time. It is not designated as to where the cattle would be taken.

2-115 (LG-6) Why was the pound per acre production increased and how with the measurement be determined and by whom?

2-116 (LG-7). At whose expense shall this be?

2-116 (LG-10). Why would ephemeral authorization be discontinued, range health and growth is reliant on rainfall with many years of abundant growth. No available increase in AUM's can cause a decrease in viability to the ranch economics.

2-116 (LG-13). Could you explain imposing an ephemeral forage production threshold? A decrease of pounds per acre have been imposed, also no method is stated as to how the BLM will determine this. A march 15<sup>th</sup> to June 15 time is too early to determine production. Also, how can an ephemeral/perennial permit simply be changed? No consultation as been attempted with this leasee. The past 2 years of rotation when forage conditions are not favorable has greatly decrease the calf crop of my allotment.

2-117 (IG-18). Why is this to be 1 year?

2-118 Map 2-13. Harper Lake Allotment has recently been placed completely in a DWMA. Why has the north part of the allotment been designated as the exclusion area? This is the largest portion and is quite capable of containing both cattle and other wildlife without incurring harm to the plant or animal health. This would seem to achieve both animal and range health improvement simultaneously.

4-28. Feral Dog Management. Please hurry with this one! With the increase of low-income multi family dwelling and dumping of dog they run rampant with or without the cattle present. Impose fines on the negligent owners.

4-29 & 4-30 Table 4-20. The benefits appear to be only to the residual animals. Cited is a "study" of the East Mojave. What study is this reference to, also how is an area over 120 miles relevant to the West Mojave? The terrain and weather conditions are completely different. Also cited is a competition between tortoise and cattle, no completed study is in existence. This increase in pounds per acre threshold seems to have no valid rationale documented. This could decrease cattle production on Harper Dry Lake. An increase in cattle movement could increase impact to range health, as well as impacting residual animals.

Is there any documentation to support the statement of tortoise being trampled on the West Mojave?

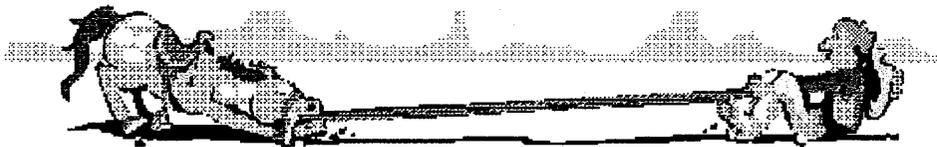
4-98 & 4-99. Cattle grazing within Tortoise Habitat and MGS Conservation Area. This sections areas to refer to the Standards and Guidelines and terms of the CDCA Plan BO of 2002. With the proposed action especially of the ranches within DWMS it appears to place all ranches in a position of going out of business. It follows up on 4-100 stating that the West Mojave Plan knows the provisions would have a substantially negative affect on the economic viability of the cattle operations within DWMA's.

West Mojave Plan, volume 2 Appendices, 0.2. CATTLE GRAZING PERMITS AND LEASES. It states that Harper Dry Lake Allotment is approximately 65% critical habitat. Even disbursement of cattle threw out the entire allotment would reduce impact to any area. Decreased cattle movement will also reduce impact to both plant and animal while increasing the viability of the cattle.

Thank-you for the opportunity to review your West Mojave Plan. Conservation of our land and environment is quite important to all of the multiple use individuals. But on behave of Harper Dry Lake Allotment as the leaseholder I would like to take this opportunity to state that both the range and animal health continues to thrive. The mere fact that both improve after numerous years of co-existence attests to the fact the land is being carefully considered and cared for.

# NEWBERRY SPRINGS - HARVARD REAL PROPERTY OWNERS ASSOCIATION

P. O. Box 176, Newberry Springs, CA 92365  
(FAX: 760-257-0011)



*"Let's pull together for the needs of this community"*

President: Spike Lynch Phone 257-3371 Vice Pres: Hildamae Voght Phone 257-3350 Exec.  
Dir: Ginger Hancock Phone (760) 257-3102

Sept. 9, 2003

WEST MOJAVE PLAN  
22835 Calle San Juan De Los Lagos  
Moreno Valley, CA 92553

**RE: West Mojave Plan, Draft Environmental Impact Report and Statement**

After many years of being involved in this project, as members of the general public, as members of the "Super group" and members attending many public meeting, we still oppose many portions of this final Draft. The reasons, briefly are as follows, although we applaud the concept of a simplified governmental process for development, this plan creates a nightmare that its inception will only prove down the line detrimental to the public at large.

- The premise of the endangered tortoise is based on unscientific studies from the early 50s and 60s. After all the questioning of this "basis" for the prolific amount of tortoise, no one has been able to refute that the findings are generalized and narrowly based.
- The recent protection measures for the tortoise are not realizing any results. The protections are off-target and not addressing any of the real possible reasons for possible decline of tortoise.
- The additional measures for protecting tortoise, such as billions of dollars of tortoise fencing along existing freeways and new road right of ways, are not justified. We agree the tortoise fencing may protect an occasional tortoise, but seldom is this a major impact on tortoise populations. It does not justify the costs.
- Access road closures: Seldom does a vehicle on a secondary road run over a tortoise, especially intentionally. Most drivers on these rural type roads can easily avoid, and do, any tortoise, snake, or other desert critters. Road closures just close the desert to necessary public access.

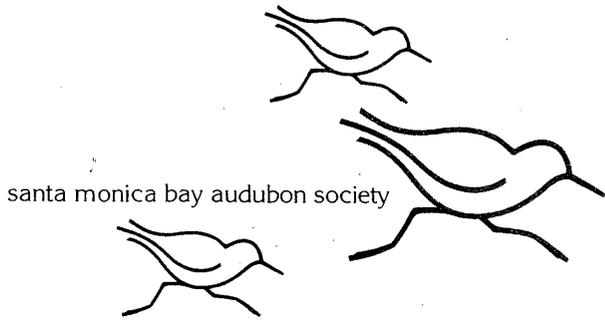
- The West Mojave Plan exaggerates the abundance of roads and access to the desert. In a typical 'city' development one mile square of land, will contain over 34 miles of developed roads. In a typical 'desert' area one mile square of land will contain less than 0.48 miles of undeveloped roads. When these undeveloped roads fall into dis-use they fade into the landscape within years, whereas 'city' road seldom fade away.
- If the West Mojave Plan closes our desert roads, not only will we preserve desert 'treasures' we will more importantly put these "treasures" on shelves in archives, where they will be seldom seen or appreciated and soon be forgotten by the public at large, to whom they are truly entrusted.
- A final comment, it seems rather questionable that 'maps on disk' would comply with public notification requirements. Even with better-than-average computer skills, these maps are not available for review in field settings. Road maps are not really available for PUBLIC review or to take to the sites and actually see recommended closures.

Sincerely and briefly, since previous comments should be already documented,



Ginger Hancock, Executive Director

& in memory and cause : Hildamae Voght, past President, VP, Ex. Dir, & Secretary, NSRPOA  
Wise Use Advocate, Leader Johnny Horizon Desert Cleanup Campaign, and Californian for  
Outdoor Recreation League



September 9, 2003

Mary Prismon  
4310 S. Ocean View Drive  
Malibu, CA 90265

William Haigh  
West Mojave Plan  
Bureau of Land Management  
22835 Calle San Juan De Los Lagos  
Moreno Valley, CA 92553

Comments on : Draft Environmental Impact Report and Statement for the  
West Mojave Plan -2003

Dear William Haigh,

As a member of Santa Monica Bay Audubon Society which has had a long term commitment to the Mojave Desert and particularly to the Jawbone-Butterbredt ACEC, I wish to affirm support for Alternatives A, and D, particularly the New and Revised Management Plans which further protection of all its natural features, plants, wildlife, and, especially, birds. Particularly we recommend, as in the Table 2-32 Summary of EIS Alternatives, the Enhanced Ecosystem Protection with high priority on protection of sensitive plants and animals, even if this requires limits on motorized vehicle access to and multiple use of the western Mojave Desert.

Of particular concern:

- a. Implementation of heavier fines for violations, and rigorous, unequivocal enforcement for ORV's against motorized encroachments off of legal trails/roads in closed areas of the ACEC.
- b. Larger signs and better placement to inform riders of legal and non-legal routes.
- c. Restoration of scarred areas to improve and restore habitat. Many obvious scars on hillsides of the Butterbredt Spring closed areas and on the mountains west of Kelso Valley road invite further incursions. Bikers profess ignorance or flaunt restrictions at this time, even on private lands. Fences have been cut. The Pacific Crest Trail has been subject to motorized use.

We further oppose the permitting of any Wind Power development by BLM or any other agency on government land or allowing use of heavy equipment on Jawbone Canyon Road, or extension thereof, for the building of the Lone Tree Canyon Windpower project on private land outside the ACEC. That access should not be at the expense of protected environment or general taxpayers. Supposedly environmentally desirable, wind power, especially in such locations, is extremely costly both monetarily and in irreversible damage to the land and its esthetic value. Solar powered housing in new developments would far more economically serve the purpose with only very short term

and distant manufacturing environmental costs, presumably not incurred in pristine ecosystems.

Further, birds, particularly Golden Eagles, will be at risk, both from the turbines, themselves, power lines and towers and but also, from the construction disturbances on the roads in their nesting and hunting area. At least two Golden Eagle nesting sites are within one and one-half to two miles of the development and the affected roads in Jawbone Canyon.

The endangered Mohave Tarplant has also been found past Blue Point in Jawbone Canyon at a spring near the projected road.

SMBAS strongly recommends :

Establishment of the Bendire's Thrasher Kelso Valley Conservation Area with the consolidation of land, habit protection and monitoring as designed.

Establishment of the endemic Kelso Creek Monkey Flower - Conservation Area - with the monitoring, cattle grazing controls and adaptive management practices as described in (M-34), (M-35) and (A-32---35) and

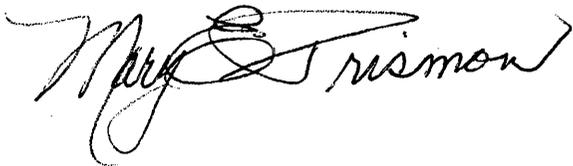
Continued enhancement of the Internationally Important Bird Area at and surrounding Butterbredt Spring through consolidation and acquisition of land, grazing management, ORV controls, and studies for the presence of valuable or threatened species such as the Mohave ground squirrel, yellow-eared pocket mouse, bats and interesting botanical species or communities.

Pending a to-be-hoped-for future amendment of the Federal Land Policy Management Act, whose terms are often contradictory and uses in conflict with each other, we commend the determination of ACEC'S, Conservation Management Areas and procedures undertaken to implement them in the West Mojave Plan that provide some measure of protection of desert resources, especially its wild habitats, for future generations to appreciate and enjoy.

Sincerely,

Mary Prismon

For the Santa Monica Bay Audubon Society

A handwritten signature in black ink, appearing to read "Mary Prismon". The signature is fluid and cursive, with a large, sweeping initial "M" and a long, horizontal flourish extending to the right.