

September 1, 2003

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

To whom it may concern:

The following letter is my formal comment on the West Mojave Plan (WEMO). It has come to my attention that the comment period deadline of only ninety days will be soon upon us. I know many who will be impacted by this plan who will not be able to comment in the given short time period. I request an extension to the comment period to give those who will be impacted by this plan a chance to review the document. Having reviewed the plan myself I would like to offer the following comments.

Restricting and closing off road routes open to the public, including off road motorcycle enthusiasts is not the answer to increase the number of desert tortoises. Fencing off these areas provides convenient lookout perches for the ravens. Scientific study has concluded that the ravens prey on the desert tortoise. As an off road motorcycle enthusiast I can attest that I have never known nor am aware of any motorcyclist ever harming a tortoise or their burrow. I recommend an effort be made to reduce the number of these non-native ravens, which prey on the desert tortoise.

My family and I have had many good memories in the areas included in the West Mojave Plan (WEMO). It is part of our heritage enjoying the outdoors together on this land. Losing access to this land would be a sad end to this heritage. Motorcycles and off road vehicles are the best methods in traversing this terrain. Designating routes as closed unless posted open is unjust.

Capricious route closures and further restrictions to the areas we can ride freely are disheartening. Please do not close routes designated duplicate or parallel. The Barstow to Vegas corridor I insist to be placed back in the open route list. The Johnson to Parker and Johnson to Stoddard routes should be allowed to continue as open routes for competition. Wording in the document should be as such to allow corridors for competitive events. In addition, organized tours for dual sport motorcycle use on open routes should be approved without further EA or monitoring.

My family, friends and I always respect the law of the land and continuously seek to better understand nature. Spending time in the desert bonds us closer to nature. It also bonds our families and friends together. The friends and club members whom I ride with and who are involved in off road motorcycle events have the highest degree of integrity of people I have ever met. They are an intelligent group of successful people who look to enjoy these areas and competitive events as a way to escape from the stress of the daily grind. Please consider us when devising the WEMO plan.

Sincerely,

Robert O. Keller
1900 Grenadier Dr.
San Pedro, CA 90732

- I have observed that ravens are the single largest enemy of the tortoise. I am very proud of the tortoise population we have and am tired of motorized vehicles being blamed for a tortoise reduction.

Please no fencing for control.

- Please please have all routes open unless signed as closed. This is the proper way to control!

- Prepare a complete updated survey of all route inventory. We all utilize these.

- Re-open closed routes in the Spangler Open area.

I believe I represent a "typical" user of our great California resources and since 1975 have seen more and more land and access taken away. Please consider each point I have addressed, as these are very important issues.

Sincerely,

Larry Kleinschmidt (and family & friends) M120X

28701 Rancho Grande *Gary Kleinschmidt*

8/29/03

Laguna Niguel, Cal. 92667

Home (949) 643-0995

Work (949) 759-8091 (C.P.A. & CFO of The Mayer Corp.)

9/2/2003

WEST MOJAVE PLAN

Dear Sir

The West Mojave Plan is just now getting out to the public. The BLM did not orchestrate publications to everyone concerned; therefore the comment period needs to be extended. Great emphasis is placed on the tortoise recovery, as should be, closing off areas of public and private land is not working, as the absence of humans only welcomes the ravens to the area.

Having used most of the desert of So. Calif, Arizona and Nevada for the past thirty years the open areas have shrunk to nearly nothing.

The West Mojave area is where my family competes and play; therefore the closure of most of the Spangler's, Johnson Valley, Fremont recreation area, Cinnamon Hills and Stoddard Valley has caused a great impact on our families togetherness. The BLM's survey is greatly flawed. The surveys of 1980 and 85 through 87 are incomplete and therefore must be finished. As a concerned citizen, please include me on your mailing list.

Sincerely



Wilbur Eveland
16301 Oak Bluff Rd
Canyon Country, CA 91387

Gil Busick
651 west Walnut Avenue
El Segundo, Ca
90245

August 31, 2003

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

Dear Bureau of Land Management:

As an avid motorized recreationist I am very interested in how the Southern California Desert will be managed for the next 30 years. I and many other motorized recreationists have well over \$10,000 invested in equipment that I use in desert areas affected by the WEMO plan. It is my understanding that Congress has mandated that public lands are to be managed with multiple uses in mind. It appears that the economic impacts of this plan are understated and hence undervalued in steering this plan. The California Off Highway Vehicle Motorized Recreation Division of California's Department of Parks and Recreation produced a report in 1991 that Off-highway vehicle users pump over 3 billion dollars into the California economy annually, based on the increase in motorized recreation over the past 12 years it is estimated that the figure is now over 6 billion dollars a year. The California Department of Parks and Recreation has a report available titled "Off Road Adventure Packet" there is lots of good information in this document that should have been taken into account when drafting WEMO pertaining to the increase in motorized recreation and the decrease in available recreation land and the negative effects of land closures and restrictions. The WEMO report seems lopsided with the emphasis being on closing and restricting recreation, grazing, mining and construction all in the name of protecting the desert tortoise. How much more land does the desert tortoise need? There have been protected areas for the tortoise for years and the tortoises continue to decline. There has been no scientific evidence that giving the tortoise more land area will help the tortoise survive. The research that has been done suggests that the demise of the tortoise is due to respiratory problems and an out of control raven population. There is nothing in the WEMO plan that addresses these causes of tortoise demise yet more land closures are proposed and they have not proven to help. The Desert Wildlife Management Areas would set aside 1.2 to 1.79 million acres in addition to the existing 1.15 million and the 6.4 million acres of critical habitat and the millions of acres of wilderness, national parks and monument areas. If a decision is made for land management it should be made based on facts and verified peer reviewed science. If the blm is concerned about the tortoise they should implement a captive head start breeding program and work to eradicate the raven population, possibly with a bounty. The report seems to contain an abundance of unsubstantiated speculation littered with language such as may, maybe and could. District 37 dual sport has put on dual sport rides in the desert with 1.4 million miles of travel without the loss of a single tortoise. Fencing areas will result in raven perching locations, danger to the public, a liability for the blm and a maintenance nightmare. Where is the funding to build and maintain all these fencelines? Where is the budget and financial business plan for these different alternatives?

On the subject of routes and route designations all routes should be open unless signed as closed this should save signs, eliminate raven perches and improve the beauty of the desert, less signs makes the desert less spoiled as signs detract from the getting away from the city experience. The entire desert needs to be surveyed not just part of it. A plan cannot be based on a 15-18 year old land survey. There are lots of single track routes existing that are left out of the surveys. The public shouldn't be made to suffer on account of a shoddy land and route survey. Parallel routes should not be eliminated arbitrarily without a scientific justification on a case by case basis. There should be at least 2 alternatives with a variety of route networks selected from existing routes as NEPA requires.

When this report is revised and adopted there should never be a requirement for monitoring or additional Environmental assessments to obtain permits for races and organized dual sport rides etc.. The report should have the EA contained in it so there is no need for a new assessment for every event. There is no justification for speed restrictions and monitoring for dual sport events therefore there should be no requirement for this. The Barstow to Vegas corridor should be placed back in the inventory. Congress has specifically allowed for point to point events. The Johnson to Parker and Johnson to Stoddard race corridors need to be available for events inside and outside the open areas. Freemont recreation area should be created as mitigation for past land closures. The Fremont area should be used as a connecting corridor between Spangler and El Mirage using existing routes. Wherever there are closures connector corridors should be designated for traveling from one area to another.

If public comments are wanted as required by law why were all of the public meetings held at locations outside the Los Angeles basin which is where the majority of west Mojave users live. Please add several more meetings in the LA/ Orange County area so that you may here what the public has to say. The document is awfully lengthy even though many sections are incomplete. An executive summary or overview would be helpful for those of us that have a vested interest but don't have the time to read through the 5 inch phone book like text. Because of the size of this document and the importance of it I would like to request that the comment period to be extended. 90 days is not long enough for people with jobs and families to digest this document, proof ground maps and verify sources quoted in the DEIR/S

Thank you



Gil Busick
Proud Member of
CORVA

Blue Ribbon Coalition
AMA District 37

Big Bear Trail Riders Club

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

August 28, 2003

To whom it may concern:

I am writing this letter to comment on the proposed WEMO.

Having lived in Southern California all my life and spending many days per year in the West Mojave Desert, my family and I enjoy and appreciate all that this area has to offer. As an American and native Southern Californian, having unfettered access to this public land is a privileged benefit granted to me by Congress that I do not want to lose. I consider myself an environmentalist. I respect and enjoy the land. I recycle, obey the law, and have the highest respect for nature. I have traversed many trails in the Sierra Nevada and San Gabriel Mountain ranges and know them well. I enjoy hiking and I also enjoy offroad motorcycle riding. These are cherished family past times which bring families together and bond friendships. Offroad motorcycling including organized events are a very important part of my heritage.

I promise you that I have never, nor ever heard of any motorcyclist running over or killing a desert tortoise. Banning motorcycle access and raising fences is not the answer to protecting the desert tortoise. In fact many birds that prey on the desert tortoise, such as ravens, perch on the wire fences in the desert. The raven numbers must be reduced in order to limit them from preying on the desert tortoise. I care very much about the biodiversity of the desert and do not want it harmed.

I believe public administrations such as the BLM need to make responsible and intelligent decisions in the course of managing these public lands. Do not raise fences as outlined in the Draft Environmental Impact Report. Reopen the Barstow to Vegas corridor and please keep existing routes open. Please allow the Fremont Recreation Area to be connected with the Spangler Open Area using the routes in place. The closure of the Spangler Open Area C routes was supposed to be temporary. Please allow these routes to be utilized again.

As a manufacturer of after market motorcycle components I would like to also mention that such route closures do have a negative economic impact on my business. Since many offroad motorcycle enthusiasts just hang up their helmets and quit riding, I loose them as customers.

Intelligent management of public lands includes intelligent utilization. Exclusion of public access and forcing closure to offroad enthusiasts is unjust, not economically sound nor environmentally sound. It is not the intelligent alternative.

Yours truly,



Richard Keller, LLTool@pacbell.net
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San Pedro, CA 90731

Nicholas M. Campion

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Telephone 949 240-5853
Fax 949 364-2289

September 2, 2003

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

Dear Sir or Madam:

As an avid motorized recreational user of the West Mojave Desert in California, I have followed your department's management of this area with great interest. I received my copy of the Draft Environmental Impact Report and Statement for the West Mojave Plan and wish to make comments concerning its content. I have been recreating in this area for over 35 years, first with my parents and now as a parent myself with my family. It has always been a special place for my family and me and I am concerned that my children's ability to continue to utilize this area in the future may be substantially reduced through excessive regulation by your department. Motorized recreation is by far the most widely used type of public recreation in this area. It is not an area that is well suited to hiking, or other non-motorized use. The sheer size of the land requires motorized means to fully appreciate the recreational value of the land.

I know it is impossible for me to argue for one on the "non proposed" alternatives, however, I would like to advocate for the following amendments to Alternative A, the proposed action.

1. **Please extend the comment period.** Ninety days is just too short a timeframe for the public to digest a document of this magnitude, ground truth maps and verify sources quoted in the DEIR/S. I have many friends who will be affected, who do not have sufficient time to respond. **This is a MUST.**
2. **There were no public meetings held in the L.A., Orange County or Ventura County areas** where most recreational users of the West Mojave reside. Please add at least three more meetings so that the public may be heard. Most of us work every day and pay taxes to support your department. It is difficult for us to attend meetings held far away from our homes.
3. **We recommend adding only one large DWMA as described in Alt. E.** This DWMA has been established de facto by the closures and restrictions created by the Route Designation process. The DWMA should be a combination of acreage from the proposed Fremont-Kramer and Superior-Cronese DWMA's and contain 1,118 square miles.

4. **We recommend that BLM implement the "head start" program of captive breeding to replenish the tortoise population at Fremont Valley.** The raven population must be brought under control for the tortoise recovery program to be successful. Establish a bounty on the raven. Do not implement the fencing recommendations in the DEIR/S. Fencing will only provide a perch site for ravens. I believe that the evidence shows that this is the single largest threat to the tortoise.
5. **All routes should be considered open unless signed closed.. This is a MUST.** Nowhere in our country are roads required to be signed as OPEN. If a road exists, it is OPEN. In addition, all routes designated as open should be considered programmatically approved for dual sport use. No further EA or monitoring should be required for organized tours. D-37 Dual Sport has compiled 1.4 million miles of travel without the loss of a single tortoise.
6. **Of the twenty three sub regions only eleven were fully surveyed.** The other twelve relied on the 1985-87 survey, which contained no single track trails. The public should not be required to suffer because BLM did a shoddy job of route inventory. We insist on a complete survey. Garbage in – garbage out.
7. **The Johnson to Parker, Johnson 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 same is true for the Barstow to Vegas corridor. We insist that it be placed back into the inventory – it does exist!
8. **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 routes that were closed in Route Designation should be returned to open status. No consideration was given as to user preference or degree of difficulty. Just because they appear to be parallel on the map does not mean that they don't have value to the users.
9. **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.
10. **The Study of Economic Impacts, pages 4-96 and 4-97 greatly underestimates the economic benefits derived from motorized recreation.** The Motorcycle Industry Council estimates motorized recreation contributes six billion dollars annually to the California economy. Chapter 3.4.4.4, Economic Contribution of OHV Recreation and Table 3-55 offer no dollar estimates. This is important to

estimate the impact on local and state economies due to diminished recreational opportunity. The local economies are already in terrible shape in California.

11. **The DEIR/S violates the National Environmental Policy Act** by failing to "provide a clear basis for choice amongst options." Alts A thru 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. We request the following two options.

- 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 detrimental effects, if any. Other mitigating measures besides closure should be considered as part of the site specific analysis.
- There should be at least two alternatives with a variety of route networks selected from existing routes. The proposed alternatives provide no opportunity for choice.

12. **The DEIR/S violates NEPA by failing to "devote substantial treatment to each alternative** considered in detail so that reviewers may evaluate their comparative merits." The DEIR/S fails to provide analysis or data to support the proposal in Alt. A thru E to reduce open routes in ACECs and in higher density tortoise population areas. There is no documentation provided in the administrative record indicating the methodology or analysis used to determine which routes would be closed, showing location or identification of routes to be closed and no scientific justification for closure. Please use good science for your decisions!

In closing, let me just say that I have worked with your agency in the past to find ways to best utilize this great land that you hold in the public trust. I want to help you to do the best job possible to manage this area for all of the people, not just the most vocal or the ones with the most dollars or lawyers. Please keep the maximum amount of the public land available to the public, don't lock it up or make it unavailable except to foot travel where only the young and hardy will be able to access it. Motorized recreation, in all its forms is a valid use of this desert region and must be a major consideration in your decision process. Thank you for considering my comments.

Sincerely,



Nick Campion and family

cc: Bill Howell, D-37 WEMO Coordinator

September 1, 2003

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

I am writing to express some of my concerns regarding the many flaws contained within the plan. Congress has mandated that management of public lands include multiple uses. This plan is heavily biased toward conservation and exclusion of the public and does not adequately consider other legitimate uses. As a motorized recreationist I urge you respect the rights of all users and amend the plan to include diverse multiple use.

The comment period should be extended by at least sixty days. There simply has not been adequate time for the general public to properly review the document. Nor to verify the routes listed or confirm the veracity of many sources quoted within the plan. There were no public meetings held in the greater Los Angeles area. Most of the recreational users of the West Mojave live in this area. At least two additional, heavily advertised, meetings should be held to allow public comment.

There are so many flaws in the plan and they are of such great importance it is difficult to decide how to present them. Please do not assume that one is necessarily more important than another by the order in which they are listed.

The plan does not "devote substantial treatment to each alternative considered in detail so that reviewers may evaluate their comparative merits." There is not adequate information available to verify routes. A CD cannot be taken into the field for use. Paper maps need to be provided. There is no analysis or listing of which routes are proposed to be closed, nor is there any "good" scientific justification presented for closing any route.

The DEAR/S fails to meet requirements of the National Environmental Policy Act because it does not contain significant options from which to choose, there should be a minimum of two distinct choices. There should be a variety of route networks listed in a minimum of two alternatives. All existing routes should be considered open unless and until valid scientific study shows otherwise. These studies must be on a case by case basis and not "broad" or "sweeping" closures.

Dual sports events have had inappropriate speed restrictions placed on them. Post event reports have indicated that no tortoises have been harmed and very little, if any, plant damage. The current California "Basic speed limit" should be used.

The Study of Economic Impacts, pages 4-96 and 4-97, greatly underestimates the benefits to the economy from motorized recreation. Using appropriate accounting procedures, this area needs to

be redone to reflect accurate information.

The establishment of four DWMA's for the tortoise is inappropriate. There is not sufficient scientific evidence to support them. One large DWMA in the Fremont-Kramer and Superior-Cronese area of about 1,118 square miles should be formed. Focus on species management, rather than public exclusion. For example, direct efforts toward solution of the tortoise respiratory problem and control of the raven population. Establish a bounty on the raven, a non-native bird. Implement a program of captive breeding for the tortoise to repopulate the Fremont Valley.

Do not adopt the Fencing recommendations in the DEIR/S. Fences provide perching places for ravens to hunt tortoises. The cost of fence installation would be between \$13 and \$15 million. There is no budget established for this, nor is any consideration given to maintenance costs. Fences also impair emergency operations, pose a threat of injury or death to humans and other animals, and significantly degrade the inherent "openness" of the desert.

Many aspects of this plan have been based on assumptions made without "good" scientific evidence to support them. Either provide the needed research and supported documentation based on "good" science or amend the plan accordingly.

All routes should be considered "open" unless and until "signed" closed. Any closures should be on a case by case basis, only after scientific evidence proves a need, not speculation or supposition that it would be "better" for some reason or another.

All open routes should be approved for dual-sport use without further regulation or restriction. D-37 Dual Sport has completed 1.4 million miles of desert travel without the loss of a single tortoise.

To date the BLM has surveyed only eleven of the twenty three sub regions relating to route inventory. This is not acceptable. A complete survey must be undertaken.

Congress has specifically allowed point to point events. The Johnson to Parker, Johnson to Stoddard race corridors have been litigated and approved by the courts. The plan needs to specifically include the continued use of these corridors for competitive events.

The Barstow to Vegas corridor needs to be put back in the route inventory.

The closure of "C" routes in the Spangler Open Area was temporary. These routes should be put back in the route inventory.

In "Route Designation" all duplicate and parallel routes should be returned to open status. No route should be closed without "good" scientific evidence requiring it. Parallel and duplicate routes provide many varying degrees of difficulty and/or other significant variables. It should be left to the user to determine which is appropriate for them.

I strongly urge the creation of the Fremont Recreation Area as described in Alt. E. This would be a small step in mitigating the loss of use opportunities due to route closures. The Fremont Recreation Area should be connected to the Spangler and El Mirage open areas using existing routes.

A "C" route system should be established in the Cinnamon Hills, as described in Alt. E.

The possible uses of the land by the people are as many and diverse as peoples' imagination. What I like, others may not, however, their right is no greater than mine. Any plan which undertakes the management of public lands must consider everyones rights, not just the loudest or most well funded or the most "politically correct." To do less degrades our great country.

Sincerely,

A handwritten signature in cursive script, appearing to read "David E. Cook". The signature is written in black ink and is positioned below the word "Sincerely,".

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

September 2, 2003

To: WEMO Committee, Congressman Richard Pombo, and 3rd District Supervisor Bill Campbell

RE: Comments on the West Mojave Plan.

I would like to comment on the West Mojave Plan:

I am hoping that our local officials will represent the public and amend Alternate "A" to include most of the items contained in Alternate "E". I am a member of the motorized recreation community and feel it would be a great loss of our basic American rights if the wide open free lands were closed for use to the general public, or possibly only open to those who can afford the proper "passes".

I believe there is a recommendation that closes all routes not specifically marked as open. This is the exact reverse from our current program. I believe all routes should be considered open unless marked closed for some specific reason. If this closed unless marked open plan goes forward, I would at least like to ask for a complete survey and not rely on incomplete BLM data from 1980's. Of the BLM's "surveyed regions". It has been documented that there were over 450% more trails found by an independent study. The BLM did not do a complete survey due to budget and time constraints. Hopefully, our officials will decide on the plan that makes the most sense and costs the least and leave the trails open.

I believe a major concern in the region is the tortoise population. I believe we should control the non-indigenous raven population, which is flourishing on a diet of young turtles. District 37 has completed 1.4 million miles of competition without the documented loss of 1 single tortoise. The cause for the decline is not the motorized vehicle community. I believe if the BLM was really interested in saving the tortoise it should consider the "Head Start" program.

I believe that fencing the desert as described in the DEIR/S is, respectfully, idiotic. Not only is it ridiculously expensive. The only benefit is to the fencing company who wins the contract. Surely, with the shortfalls of our states budget, there is a better way to spend the millions this will cost. Lastly, those same fences will give the above mentioned ravens a better place to perch.

Below are a few actions I would like to see happen:

The Barstow to Vegas corridor has currently been deleted simply as because of an oversight in NEMO. I request that it be put back in.

I would like to see the Fremont Recreation Area connected to the Mirage and Spangler using existing routes.

I would like to see the "C" route system established in Cinnamon Hills as it's described in Alt. E.

I request all parallel and duplicate routes that were closed should be returned to open status.

I request the Johnson to Parker and Johnson to Stoddard race routes should remain open as the courts have upheld in the past.

The overall number of routes should not be decreased, but rather I propose they should be increased. Recreation is a healthy part of life. Opportunities for recreation should be increased not decreased. Our media cries out for help with our nation's obesity problem, especially in children. Here's our chance to help. Instead of caving in to wishes of a few special interest groups who are trying to ban everyone from doing anything or going anywhere, I sincerely feel we should create more opportunities for families to come together and enjoy our great country.

Ironically, these same special interest groups would like to paint a picture of the motorized vehicle community a bunch of lawless hellions. This could not be further from the truth. If you care to look you'll find no one cares more about the land we use than our community. Recently my club held a family event at El Mirage; the rangers gave us tremendous compliments on how clean everything was when we left. This is not the picture of hellions the special interest groups are trying to paint. We have an event this weekend out at Red Mountain off the 395 and Trona road. You are welcome to attend and inspect for yourself.

The motorcycle industry contributes six billion dollars annually to California's economy. If nothing else surely the economic impact of shutting it down should be staggering. Any public official directly responsible for that kind of revenue loss surely has ended his/her career. Personally, my family uses our public lands and would like to see them protected yet useable. I hope our officials will have the vision to keep our land free.

Thank you for your consideration and could you please include me on your mailing list-email list.



Tim Morenc
10 Calle Arcos
Rancho Santa Margarita, CA 92688
tmorenc@whitmont.com

CC Richard Pombo
Bill Campbell
Bill Howell

4405 Tosca Rd.
Woodland Hills, CA 91364
September 1, 2003

WEST MOJAVE PLAN

Linda Hansen
Bureau of Land Management
22835 Calle San Juan De Los Lagos
Moreno Valley, Ca 92553

Subject: Comments on ~~Decision Record, CDCA Plan Amendment dated June 2003~~
WEST MOJAVE PLAN

Dear Ms. Hansen:

I am a private landholder on Juniper Flats and have submitted previous comments on the proposed CDCA Plan Amendment. The following comments are in response to the June 2003 Plan Amendment and relate to the Juniper Sub-region and Map 69:

1. Please consider a Collaborative Access Planning Area with an extended date for completion similar to the accommodation made for the El Paso Region. Juniper Flats/Arrastre Canyon is similar to El Paso in that it contains an ACEC and is in proximity to a highly populated area. Planning for this area is incomplete. The JUNIPER FLATS/GRAPEVINE CANYON COORDINATED RESOURCES MANAGEMENT PLAN was drafted, but never adopted. In the process of preparing that plan, residents, recreational users and private landowners met on several occasions and drafted a list of concerns. These issues included OHV non-compliance, threat of wildfire, spread of non-native plants, resource and species protection, cattle grazing and user conflicts. This comprehensive community effort has yet to be given a response. Residents have been told that WEMO would address those issues, but this plan seems focused on concerns for the tortoise and OHV route designation.
2. The CDCA Plan Amendment conflicts with the MANAGEMENT PLAN for JUNIPER FLATS CULTURAL AREA. Section IV-C requires: "*Redesignate selected routes of travel (Illustration 3) from open to closed so as to further limit access to the key complex.*" Proposed opening of OHV route J1299 is a direct violation of this requirement as J1299 is routed through the key cultural and riparian area at Cottonwood Springs. Other recreational users are required to walk from the locked gate at the remote parking lot to access the complex. Cottonwood Springs has had a history of BLM protection and has only been recently compromised by OHV trail proliferation (which includes proposed route J1299).
3. The J1299 route description is misleading and, consequently, requirements for public disclosure have not been met. It does not appear on any map provided to the public. Further, the route description for J1299 does not match the physical location of the route pointed out by BLM personnel on a recent field trip. The description in the Plan Amendment states that J1299 goes "west via Section 1". This gives the impression that this route leads away from the cultural area. In fact, the trail pointed out by BLM personnel leads east directly through the cultural area.
4. The Amendment calls J1299 an undesignated route. It has no previous designation because it was illegally created by OHV non-compliance following the Willow Fire. Despite multiple requests for enforcement from local residents, BLM law enforcement has made no response. Local residents see the proposed opening of this route as a reward for OHV non-compliance with attendant destruction of a very special public resource. That is hardly an appropriate signal to send to the OHV community. It has especially dire portent in a region that is already heavily OHV non-compliant.
5. Proposed route J1299 was added at last minute and so avoided due process. WEMO required that requested changes for the June 30 Amendment not be given acceptance unless presented by a party who had submitted a previous comment. This requirement seems intended to ensure opportunity for public scrutiny. The last minute insertion of J1299 is a clear violation of that requirement.

6. Proposed route J1299 is a negation of the expensive post-Willow Fire route obliteration and restoration effort at Cottonwood Springs. This effort, in combination with a fence, resulted in the effective closure of the old motorized routes to the cultural and riparian area. Proposed J1299 route detours around the closure and was birthed in non-compliance by aggressive OHV riders seeking steep terrain. In a very short period of time, the fragility of the soil has already resulted in worse ruts than the original route prior to its restoration.
7. J1299 passes through a secluded zone that is impossible to monitor and enforce. Other illegal routes have already begun to proliferate from J1299. Motor vehicles must be excluded from this area.
8. Since proposed route J1299 intrudes into a riparian area, it will result in erosion, increase the proliferation of non-native weed species, disrupt wildlife and increase the risk of wildfires.
9. OHV's on the proposed route would disturb those who have hiked in to enjoy an oasis of tranquillity. There are no other refuges from motorized vehicles on Juniper Flats.
10. Proposed route J1299 has not been subjected to review as required by §106 of the National Historic Preservation Act and the cultural resources element of the California Desert Conservation Area Plan. It clearly impacts a historical site identified and protected by an ACEC.
11. According to the draft EIR statement, tribal governments were briefed in August 2001. The Serrano tribe is not listed as having been contacted and the impact of route J1299 to their cultural site was not identified until the Plan Amendment was published in June, 2003.

I applaud your team's achievements and in their performance of the very difficult task of WEMO plan preparation.

However, the irregularity attendant with proposed route J1299 is just one indicator that additional public participation is required prior to WEMO finalization for the Juniper Sub-region.

Please close route J1299 and add my voice to the request for extended collaborative planning for this region.

Sincerely,



DEAN W. GREENWALT
ROCK SPRINGS RANCH

8/27/03

BLM,

PLEASE CONSIDER MY COMMENTS REGARDING THE WEST MOJAVE PLAN. MY FAMILY AND I ENJOY MOTORIZED RECREATION IN THE MOJAVE AREA AND I AM A MEMBER OF JACKRABBITS MOTORCYCLE CLUB. OUR CLUB WAS ESTABLISHED OVER 50 YEARS AGO AND OUR ANNUAL RACE AT THE SPANGLER OPEN AREA DRAWS APPROX. 500 PARTICIPANTS AND THEIR FAMILIES YEAR AFTER YEAR.

THE RECREATIONAL AND ECONOMIC IMPACTS OF THE WEMO ALTERNATIVES WILL HAVE SIGNIFICANT EFFECTS ON NOT ONLY THOSE WHO ENJOY MOTORIZED RECREATION BUT ALL OF SOUTHERN CALIFORNIA. I RESPECTFULLY URGE THE BLM TO CHOOSE WEMO ALTERNATIVE 'E'.

IT IS MY OPINION THAT THE 'C' ROUTES IN THE SPANGLER OPEN AREA SHOULD BE REOPENED. THE JOHNSON TO PARKER AND THE JOHNSON TO STODDARD RACE CORRIDORS SHOULD BE OPEN FOR COMPETITION EVENTS. ALSO, ALL ROUTES SHOULD BE OPEN UNLESS SIGN'S ARE POSTED AS CLOSED

RESPECTFULLY,
John Sileski

JOHN SILESKI
9552 INNSBRUCK DR.
HUNTINGTON BEACH CA 92646

8/27/03

WEST MOJAVE PLAN
 22835 CALLE SAN JUAN DE LOS CAJONS
 MORENO VALLEY, CA 92553

RE: WEST MOJAVE PLAN

GENTLEMEN,

My wife and myself enjoy camping, hiking, and motorized recreation in the West Mojave Desert Area.

Since I started riding and camping in the West Mojave Area in the early 1970's, the recreational opportunities have become less and less. It appears that the BLM's failure to manage this area has resulted in many land closures that have no basis in the real world. It appears that the land closures are a defensive reaction to lawsuits from extremist environmental groups.

Land has been closed to motorized recreation without thought to science or reason. Competition areas and routes have been closed. The BLM has done a bad job of surveying the roads and trails in the West Mojave Area. They did not include any single track trails in the 1985-1987 survey
 (over)

DESERT USERS SHOULD NOT BE
REQUIRED TO SUFFER BECAUSE THE BLM
DID A BAD JOB OF ROUTE INVENTORY.
THERE SHOULD BE A COMPLETE SURVEY
OF ALL ROADS AND TRAILS IN THIS
AREA SO A VALID DECISION CAN BE
MADE ON WHAT TO CLOSE OR REOPEN
OR RE-OPEN.

JOHNSON TO PARKER, JOHNSON TO PARKER
COMPETITION CORRIDORS ARE SHOWN AS
OPEN ROUTES. CONGRESS SPECIFICALLY ALLOWED
POINT TO POINT COMPETITION EVENTS - THESE
EVENTS HAVE BEEN LITIGATED IN THE
PAST AND APPROVED BY THE COURTS. LANGUAGE
SHOULD BE INCLUDED TO ALLOW FOR THE
CONTINUED USE OF CORRIDORS FOR COMPETITIVE
EVENTS.

THE BANSTON TO VEGAS CORRIDOR SHOULD
ALSO BE REINSTATED AS A COMPETITION
CORRIDOR.

THE C ROUTES IN THE SPANGLER OPEN
AREA SHOULD BE RE-OPENED AND TRACKED
BACK INTO INVENTORY. ALL DUPLICATES OR
PARALLEL ROUTES THAT WERE CLOSED IN THE
ROUTE DESIGNATION SHOULD BE RETURNED TO OPEN STATUS.

RESPECTFULLY SUBMITTED

JAMES W. TOWNSEND
James W. Townsend

742 N. HODGEN TRAIL
ORANGE, CA 92869

West Mojave Plan
22835 Calle San Juan De Los Lagos
Moreno Valley, Ca 92253

My Name is Don Campbell and I am a California resident from the City of Castaic. I am writing this letter to make my comments on the upcoming West Mojave Plan (Wemo) that is about to be set into action. I have been a resident of the state of California for my entire 31 years of existence. In those thirty years I personally have been actively using the Mojave Desert for the last twenty five years for camping, fishing, hiking, and off-road vehicle recreation. If the current plan is accepted without any additions, I feel that my rights and the rights and happiness of my family will be severely burdened.

While reading through the current plan I would like to specifically comment on a few bullet points that I am in direct conflict with. I have outlined these few concerns in the bullet points below:

- The current review period of 90 days is far too short for the public to review this large document and properly respond to its areas of concern.
- Another is the fact that no public meetings were held within the Los Angeles basin area where a majority of the people who use these areas reside, including myself.
- For years I have been riding and racing in the Cinnamon hills along Camp rock Road in the Johnson Valley OHV area. I would like to see some "C" routes established for use of this area during future competition events, as described in Alternate E.
- I would also like to see the routes already designation as "C" routes, within the Spangler Mountains, reopened for competition use.
- I would like to see the Barstow to Vegas corridor placed back into the route inventory, since it was deleted from the Wemo plan just because it was deleted in the Nemo plan.
- Finally I would like to see all duplicate and parallel routes returned to open status because no considerations were given for user preference or degree of difficulty.

Thank you for your time and consideration in reading my suggestions. I would also like to be included on the BLM mailing list. My address is stated below.

Sincerely,



Donald L. Campbell
27738 Firebrand Dr.
Castaic, Ca. 91384
661-294-9211

Mike Kilgore 11751 Gateway Blvd. Los Angeles, CA 90064
Home Phone: (310)-473-5554

September 4, 2003

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

To Whom It May Concern:

As a reasonably frequent recreational user of the West Mojave Desert in California, I have some concerns about your department's future management of this area based on the copy of the Draft Environmental Impact Report and Statement for the West Mojave Plan I have reviewed. I have used this area for recreational purposes for over 30 years, first with my parents and now with my own family.

It has always been a wonderful place to visit and get away from the concerns and stresses of the Los Angeles urban center. Motorized recreation is the type of public recreation most typically found in this area. It is not an area that draws a lot of hikers or non-motorized recreational users of any type.

I know it is not feasible for me to argue for one on the "non proposed" alternatives, however I would like to argue for the following amendments to Alternative A, (the proposed action).

1. **Please extend the comment period.** Ninety days is a very brief amount of time for the public to digest a document of this size and complexity.
2. **There were no public meetings held in the L.A., Orange County or Ventura County areas** where the greatest concentration of the recreational users of the West Mojave reside. Please consider adding two or three additional meetings so that the public may comment more fully.
3. **We recommend adding only one large DWMA as described in Alt. E.** This DWMA has been established de facto by the closures and restrictions created by the Route Designation process. The DWMA should be a combination of acreage from the proposed Fremont-Kramer and Superior-Cronese DWMA's and contain 1,118 square miles.
4. **We recommend that BLM implement the "head start" program** of captive breeding to replenish the tortoise population at Fremont Valley. The raven population must be controlled in order for the tortoise recovery program to be successful. Do not implement the fencing recommendations in the DEIR/S. Fencing will only provide a perch site for ravens. The evidence indicates that this is the greatest threat to the tortoise.

5. **All routes should be considered open unless signed closed.. This is a MUST.**
Nowhere in our country are roads required to be signed as OPEN. If a road exists, it is OPEN. In addition, all routes designated as open should be considered programmatically approved for dual sport use. No further EA or monitoring should be required for organized tours. D-37 Dual Sport has compiled 1.4 million miles of travel without the loss of a single tortoise. That should indicate that this type of use is not a threat to the tortoise population.

6. **Of the twenty three sub regions only eleven were fully surveyed.** The other twelve relied on the 1985-87 survey, which contained no single track trails. The public should not be required to suffer because BLM did a shoddy job of route inventory. We insist on a complete survey.

7. **The Johnson to Parker, Johnson 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 same is true for the Barstow to Vegas corridor. We insist that it be placed back into the inventory – it does exist!

8. **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 routes that were closed in Route Designation should be returned to open status. No consideration was given as to user preference or degree of difficulty. Just because they appear to be parallel on the map does not mean that they don't have value.

9. **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.

10. **The Study of Economic Impacts, pages 4-96 and 4-97 greatly underestimates the economic benefits derived from motorized recreation.** The Motorcycle Industry Council estimates motorized recreation contributes six billion dollars annually to the California economy. Chapter 3.4.4.4, Economic Contribution of OHV Recreation and Table 3-55 offer no dollar estimates. This is important to estimate the impact on local and state economies due to diminished recreational opportunity. All of California is in a dire state economically, but especially this area.

11. **The DEIR/S violates the National Environmental Policy Act** by failing to "provide a clear basis for choice amongst options." Alts A thru 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. We request the following two options.

- 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 detrimental effects, if any. Other measures besides closure should be considered as part of the site specific analysis.
- There should be at least two alternatives with a variety of route networks selected from existing routes. The proposed alternatives provide no opportunity for choice.

12. The DEIR/S violates NEPA by failing to "devote substantial treatment to each alternative considered in detail so that reviewers may evaluate their comparative merits." The DEIR/S fails to provide analysis or data to support the proposal in Alt. A thru E to reduce open routes in ACECs and in higher density tortoise population areas. There is no documentation provided in the administrative record indicating the methodology or analysis used to determine which routes would be closed, showing location or identification of routes to be closed and no scientific justification for closure. Please use sound science in making your decisions.

In closing I want to acknowledge that this is a very important issue, and that the greatest consideration should be given to insuring that access for the public tax paying law abiding recreational users of this area is addressed in a fair and equitable manner.

Sincerely,



Mike Kilgore, Piko Han-Kilgore and Sean Han-Kilgore

cc: Bill Howell, D-37 WEMO Coordinator

Date September 1, 2003

Name Mr. & Mrs. John Pasquotto

Address 2103 Harrison Avenue, NW, #2-601
Olympia, WA. 98502-2636

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..

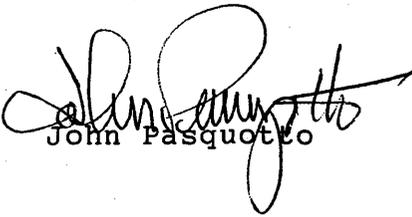
I recommend that:

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

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,



John Pasquotto

September 2, 2003

Dear Sir,

Subject: WEMO Comments

I am submitting comments on the WEMO plan. I hope my comments are of value and will be considered in the final draft of the plan. This plan effects a lot of peoples lives and much thought should be given before restrictions on the land are put in place.

First, the 90-day comment should be extended. The plan is too extensive to be able to comment on in just 90 days. Secondly, no public hearings were held in the LA basin. The majority of the visitors to the Mojave come from this area.

The DEIR/S proposes four Desert wildlife Management Areas (DWMAs) for the desert tortoise. This would set aside 1.2 to 1.8 million acres depending on which alternate is accepted. The BLM has already locked up 1.15 million acres for tortoise recovery and designated 6.4 million acres as critical habitat. This is excessive! The tortoise doesn't need more land, it needs to be cared for by starting a captive breeding program, treating the upper respiratory disease and bring the raven population under control. The raven is out there 24/7 with an eye from the sky looking for food. They are the REAL threat to the tortoise. Additional locked up land will do nothing to bring the tortoise back. Furthermore, do not implement fencing, this will only provide a perch site for the raven.

All routes should be considered open unless signed closed. That is the common sense approach that is used on roads, ski slopes, hiking trails, etc. To do otherwise is just backwards and probably very costly.

The BLM did a shoddy job of route inventory. I insist on a complete survey. Also, 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. I recommend that the Fremont Recreation Area as described in Alt. E be created as a mitigation loss of recreational opportunity due to route closures.

Finally, I support Alt E and would like to see a "C" route system established at Cinnamon Hills as Described in Alt E.

I am a member of the Training Wheels Motor cycle club. We have numerous camping events in the desert. Our camping is family oriented and involves visits from Santa, the Easter Bunny, Smoky the Bear and lots of kids crafts in addition to our off roading. Please do not lock us out of the public land that we enjoy.

Thank you,

Van Richardson



2912 Hickory Pl.

Fullerton, Ca 92835

PS. Please include me on the BLM's mailing list

JACK GARJIAN
17932 WELLSBANK LN
HUNTINGTON BCH, CA. 92649

PLEASE LET ME COMMENT ABOUT
A FEW CONCERNS ABOUT THE
1980 WEST MOJAVE MANAGEMENT PLAN

1- I THINK THE 90 DAY COMMENT PERIOD
IS TOO SHORT. A MINIMUM OF 120
DAYS PLEASE

2- SINCE NO PUBLIC MEETINGS IN THE L.A.
BASEN ARE SCHEDULED PLEASE ADD TWO
MEETINGS IN THIS AREA.

3- REGARDING THE DESERT TORTOISE, THE
RECOMMENDATION OF THE "SUPER GROUP"
SHOULD BE FOLLOWED

4- I REQUEST THAT YOU USE THE 1,118
SQ MI AREA FROM FREMONT-KRAMER &
SUPERIOR-CROUSE ^{FOR} D WMA

5- PLEASE USE THE "HEAD START" PROGRAM
TO REPLENISH THE TORTOISE POPULATION
AT FREMONT VALLEY

6- FOR THE DESERT TORTOISE TO HAVE A
CHANCE OF SURVIVLE WE MUST CONTROL
THE RAVEN POPULATION

7- PLEASE DON'T PUT FENCES UP FOR RAVEN TO PERCH ON

8- WE NEED "PEER REVIEW" REGARDING THE METHOD TO REPLENISH THE DESERT TORTOISE

9- MAKE ALL ROUTES "OPEN" UNLESS "CLOSED" SIGN IS POSTED

10- "DUAL SPORT" SHOULD BE ALLOWED ON ALL ROUTES

11- PLEASE DO A COMPLETE SURVEY 23 "SUB REGIONS"

12- PLEASE ALLOW "POINT-TO-POINT" EVENT TO HAPPEN. JOHNSON TO PARKER & JOHNSON TO STODDARD CORRIDORES

13- INCLUDE THE BARSTOW TO VAGAS CORRIDOR

14- REOPEN "C" ROUTES AT SPANGLER OPEN AREA.

15- THE CLOSING OF DUPLICATE OR PARALLEL ROUTES SHOULD REVERT TO "OPEN STATUS"

16- MITIGATION FOR LOSS OF RECREATIONAL OPPORTUNITY DUE TO ROUTE CLOSURES, IMPLEMENT FOR FREMONT RECREATION AREA

(2)

17 - CONNECT FREMONT RECREATION AREA TO SPANGLER & EL MIRAGE OPEN AREA

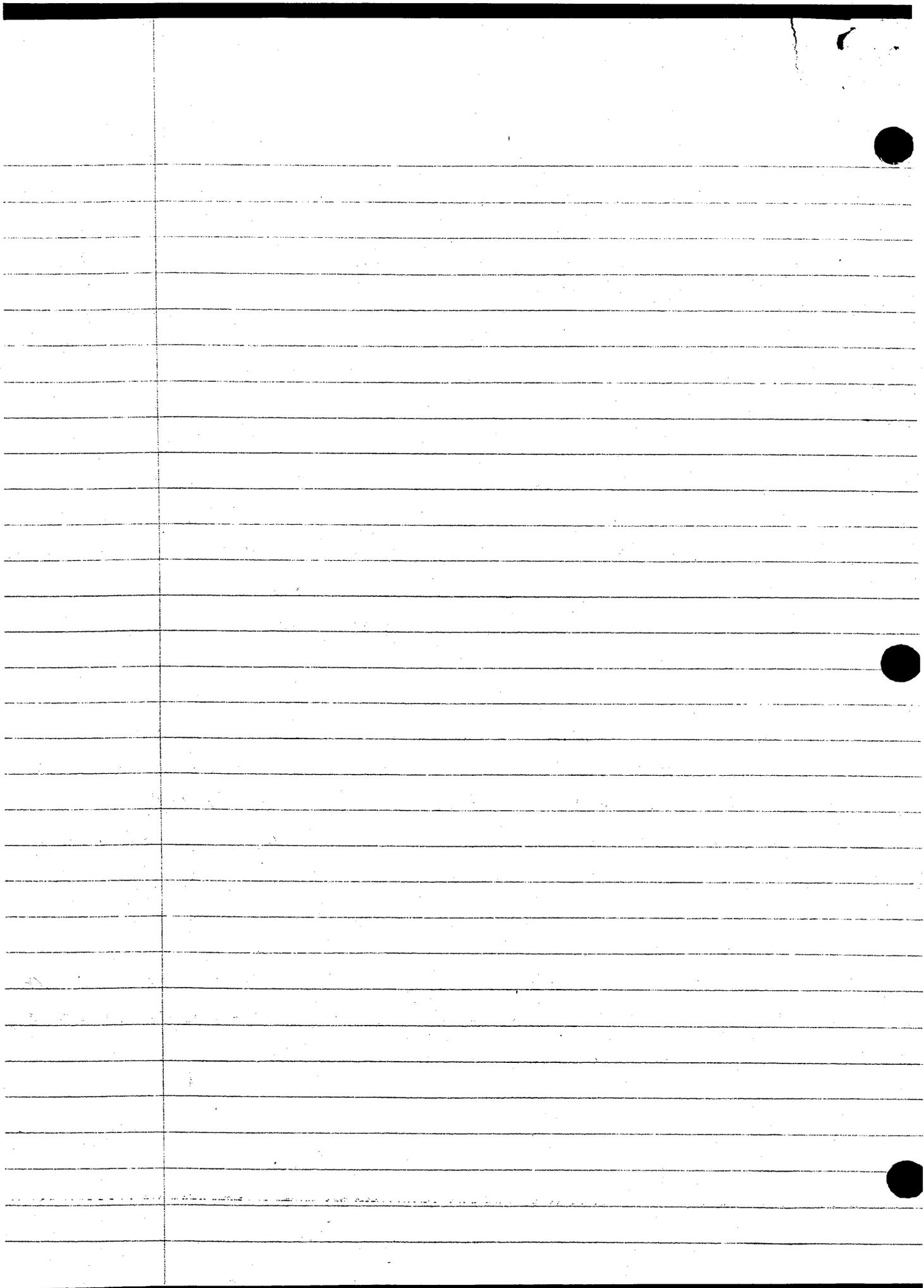
18 - CINNAMON HILLS SHOULD BE A "ROUTE - C - SYSTEM"

19 - I THINK YOU UNDERESTIMATE THE ECONOMIC BENEFITS OF MOTORIZED RECREATION ON PAGE 4-96 & 4-97. I THINK THERE IS A SIX BILLION DOLLAR ECONOMIC BENEFIT TO CALIFORNIA PLEASE REVISE YOUR STUDY AND INCLUDE THE DOLLAR VALUE OF MOTORIZED RECREATION

20 - PLEASE REMOVE "DUAL SPORT" SPEED LIMITS ~~FOR~~

21 - I THINK THE DEIR/S VIOLATE OUR "NATIONAL ENVIRONMENTAL POLICY ACT" BY NOT PROVIDING A CLEAR REASON FOR CHOICE OF OPTIONS. THERE SHOULD BE AT LEAST TWO ALTERNATIVE ROUTES TO NETWORKS CHOSEN FROM EXISTING ROUTES.

22 - I THINK THE DEIR/S DON'T AGREE WITH NEPA BY NOT HAVING THE DETAIL FOR EACH ALTERNATIVE IN REGARDS TO ITS OWN MERIT.



Raul Perez
10246 Londene Dr.
Whittier, CA 90601
Raul Perez

9/10

MEMO COMMENTS

8/27/03

#12 The Johnson to Parker, Johnson to Stoddard
race corridors are shown as open routes. I
feel that these routes should remain open
for use by motorized recreationalist because
this is public land that was designated as
such so that all individuals, including families,
children, seniors and anyone who chooses, can
enjoy this beautiful land. By closing this
land you are assuming that motorized
recreationalist are purposely destroying
this land and you would be depriving us
of public land that we care very much
about and understand the importance of
taking care of - we do this by continually
reminding motorized recreationalist of
this which they fully understand and
even volunteer time to maintain and help
clear up.

#2 There were no public meetings held in
the L.A. basin where most recreational
users of the West Mojave reside. Please
add at least two more meetings
so that the public may be heard.
This is unacceptable because in order
to obtain a fair assessment of
the comments of the most frequent

Raul Perez
10246 Londene Dr.
Whittier, CA 90601

(2)

Raul Perez

users of the West Mojave, L.A. Basin must not be excluded from public meetings. My family and I only heard of the public comments period from our motorized recreationalist club, who took the initiative to organize meetings so that we could become informed of what changes were being proposed to WEMO. When I invited some friends to attend, they gladly agreed and also expressed their concerns about the fact that the L.A. Basin had been excluded from public meetings.

#1 Please extend the comments period. Ninety days is just not enough time for the public to digest a document of this magnitude, ground truth maps and verify sources quoted in the DEIR/S. This current document, WEMO, has been in effect for several years which means many legal challenges have been filed, many amendments approved and disapproved, all of this contributes to the increased complexity of WEMO which takes time to read and fully understand. After reading these documents, ninety days is not enough time for the public to grasp this document and make comments in a realistic time frame. Additionally, the fact that no public

Paul Perez
10246 Lundene Dr.
Whittier, CA 90601

Paul Perez

③

hearings were held in the L.A. Basin, causing delays in the dissemination of information on the time frame for public comments. This resulted in public comments being compiled and submitted under an unusually severe and unfair public comment time frame.

#9 I feel that all routes should be considered open unless signed closed, this is consistent with several other states such as Nevada and Arizona, both of which have large numbers of public land designated and used by motorized recreationalists with great success. By proposing the opposite you would be spending more money and time in ensuring that these signs were posted and maintained in good condition. By designating all routes open unless signed closed you would have much better control over the maintenance and upkeep of these signs, in turn resulting in clearer designations of closed routes. Closed routes are respected by motorized recreationalists at all levels and enforced by local rangers.

Paul Perez
Paul Perez

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

To Whom it May Concern

I would like to make the following comments on the WEMO PLAN.

① Ninety days is not enough time for the general public to review all the material and comment.

② Something needs to be done with the Ravens. They are NOT native to the desert but they sure love eating tortoises.

③ A Head START Program of captive breeding & releasing of Tortoises in areas like Fremont Valley.

④ All routes should be considered open unless signed closed. Just like Nevada, Arizona deserts.

- ⑤ Reopen Fremont Area to connect with Spangler + El Mirage open areas with connecting trails into this Areas.
- ⑥ Reopen all "C" routes in the Spangler Open Area.
- ⑦ Follow Alt. E. for the Fremont Recreation Area, as mitigation for loss of recreational opportunity due to route closures
- ⑧ The Johnson to Parker, Johnson to Stoddard are open routes but we can not use. This corridors should be open for competitive events.
- ⑨ I would like to see the Barston to Vegas corridor opened and placed back in the inventory.
- ⑩ No more route or Area closures until a current study has been done on that route or Area. To give specific reasons why they should be closed.
- ⑪ For every closure for a specific reason another Area

(11 cont) or route should be offered.

(12) There never has been any real cost mentioned what the WEMO PLAN will cost us as Tax Payers.

(13) Do not close a trail just because it parallels another route that ends up in the same area. (Two different trails offer two different types of riding and enjoyment).

(14) We as tax payers and off-landers demand a complete survey of all trails including a complete and accurate inventory of all our trails.

Thank You For Your Consideration And Time.

Jim Beddes
Vikings M.C. (85 members)
President District 37 (3,200 members)
1037 E. Terrace Dr.
Long Beach, Ca. 90807

Greg Mellgren

mellgren1@cox.net

21885 Birchwood Ave
Mission Viejo, Ca 92692
Telephone 949-466-2995

September 2, 2003

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

Dear Sir or Madam:

As an avid motorized recreational user of the West Mojave Desert in California, I have followed your department's management of this area with great interest. I received my copy of the Draft Environmental Impact Report and Statement for the West Mojave Plan and wish to make comments concerning its content. I have been recreating in this area for over 35 years, first with my parents and now as a parent myself with my family. It has always been a special place for my family and me and I am concerned that my children's ability to continue to utilize this area in the future may be substantially reduced through excessive regulation by your department. Motorized recreation is by far the most widely used type of public recreation in this area. It is not an area that is well suited to hiking, or other non-motorized use. The sheer size of the land requires motorized means to fully appreciate the recreational value of the land.

I know it is impossible for me to argue for one on the "non proposed" alternatives, however, I would like to advocate for the following amendments to Alternative A, the proposed action.

1. **Please extend the comment period.** Ninety days is just to short a timeframe for the public to digest a document of this magnitude, ground truth maps and verify sources quoted in the DEIR/S. I have many friends who will be affected, who do not have sufficient time to respond. **This is a MUST.**
2. **There were no public meetings held in the L.A., Orange County or Ventura County** areas where most recreational users of the West Mojave reside. Please add at least three more meetings so that the public may be heard. Most of us work every day and pay taxes to support your department. It is difficult for us to attend meetings held far away from out homes.
3. **We recommend adding only one large DWMA as described in Alt. E.** This DWMA has been established de facto by the closures and restrictions created by the Route Designation process. The DWMA should be a combination of acreage from the propose Fremont-Kramer and Superior-Cronese DWMA's and contain 1,118 square miles.

4. **We recommend that BLM implement the "head start" program** of captive breeding to replenish the tortoise population at Fremont Valley. The raven population must be brought under control for the tortoise recovery program to be successful. Establish a bounty on the raven. Do not implement the fencing recommendations in the DEIR/S. Fencing will only provide a perch site for ravens. I believe that the evidence shows that this is the single largest threat to the tortoise.

5. **All routes should be considered open unless signed closed.. This is a MUST.** Nowhere in our country are roads required to be signed as OPEN. If a road exists, it is OPEN. In addition, all routes designated as open should be considered programmatically approved for dual sport use. No further EA or monitoring should be required for organized tours. D-37 Dual Sport has compiled 1.4 million miles of travel without the loss of a single tortoise.

6. **Of the twenty three sub regions only eleven were fully surveyed.** The other twelve relied on the 1985-87 survey, which contained no single track trails. The public should not be required to suffer because BLM did a shoddy job of route inventory. We insist on a complete survey. Garbage in – garbage out.

7. **The Johnson to Parker, Johnson 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 same is true for the Barstow to Vegas corridor. We insist that it be placed back into the inventory – it does exist!

8. **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 routes that were closed in Route Designation should be returned to open status. No consideration was given as to user preference or degree of difficulty. Just because they appear to be parallel on the map does not mean that they don't have value to the users.

9. **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.

10. **The Study of Economic Impacts, pages 4-96 and 4-97 greatly underestimates the economic benefits derived from motorized recreation.** The Motorcycle Industry Council estimates motorized recreation contributes six billion dollars annually to the California economy. Chapter 3.4.4.4, Economic Contribution of OHV Recreation and Table 3-55 offer no dollar estimates. This is important to

estimate the impact on local and state economies due to diminished recreational opportunity. The local economies are already in terrible shape in California.

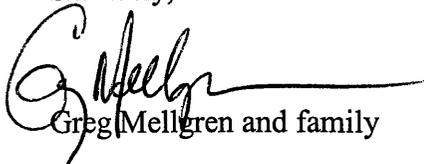
11. **The DEIR/S violates the National Environmental Policy Act** by failing to "provide a clear basis for choice amongst options." Alts A thru E offer the same redesign networks in tortoise critical habitat and "adopt existing designated networks elsewhere." Alt. G provides for no change to existing network. We request the following two options.

- 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 detrimental effects, if any. Other mitigating measures besides closure should be considered as part of the site specific analysis.
- There should be at least two alternatives with a variety of route networks selected from existing routes. The proposed alternatives provide no opportunity for choice.

12. **The DEIR/S violates NEPA by failing to "devote substantial treatment to each alternative** considered in detail so that reviewers may evaluate their comparative merits." The DEIR/S fails to provide analysis or data to support the proposal in Alt. A thru E to reduce open routes in ACECs and in higher density tortoise population areas. There is no documentation provided in the administrative record indicating the methodology or analysis used to determine which routes would be closed, showing location or identification of routes to be closed and no scientific justification for closure. Please use good science for your decisions!

In closing, let me just say that I have worked with your agency in the past to find ways to best utilize this great land that you hold in the public trust. I want to help you to do the best job possible to manage this area for all of the people, not just the most vocal or the ones with the most dollars or lawyers. Please keep the maximum amount of the public land available to the public, don't lock it up or make it unavailable except to foot travel where only the young and hardy will be able to access it. Motorized recreation, in all its forms is a valid use of this desert region and must be a major consideration in your decision process. Thank you for considering my comments.

Sincerely,



Greg Mellgren and family

cc: Bill Howell, D-37 WEMO Coordinator

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

Dear sirs,

28 August 2003

First let me say after becoming familiar with The Draft of the West Mojave Plan that I am totally amazed at the lack of scientific justification for the conclusions that support such an plan and the lack of fiscal responsibility shown by the items proposed in the Plan.

Furthermore I am distressed by the removal of another family past time shared by my family of 6 who are now grown and many other families that make desert adventures part of their life. Certainly the ones that have drafted the Plan have no idea of the impact to those of us who regularly use the desert.

You must extend the comment period and have more public meetings where the users reside. Ninety days – I have been riding the area since the early 1970s and have knowledge of only a small portion of the plan you propose.

Specifically let me comment on several items:

You propose areas for the protection of a species based on arbitrary decisions. Go back and do the proper studies to define the reasons for decline if any. Once defined, assign priority to the threats. This is good science and common sense. The Plan does not address the threats as is now understood. Infection and Raven predation top a list way ahead of other causes.

Remove the fences and don't put up additional. You will be coming to the users asking for more funds to pay for unneeded/unwanted expenditures.

The Plan does not include a mirad of trails used as single track by motorcycles in specific. Re-survey all trails and include as open unless posted otherwise. This is convention as is commonly accepted. You see fit to go counter to convention.

The corridors that have been used for Barstow to Vegas and for the Check Chase should be listed as competition corridors and given specific language to that end. Just because you forgot to put the corridor for the largest off road event ever held in the country and perhaps in the world into your plan does not and should not simply delete the competition corridor. Correct what you forgot. Place B to V in the route inventory.

Re establish routes in the Cinnamon Hills and in Spangler Hills that were closed "temporarily" – permanent is not temporary. Route closure is not supported by the documentation. In fact there is little if any scientific methodology to much of the proposed closures.

In conclusion; although I understand that much of the underlying work was done due to deadline and not to best supply the appropriate best solutions there is still is an opportunity to correct many of the errors in the findings before the draft of the plan is final. This will potentially keep many of the errors from being challenged in the courts. I urge that you do this now.

Thanks for your attention.

Richard L. Jackson
32901 Hawley Rd.
Acton, Ca. 93510



Father of 4 (3 girls and a boy) All active riders and off road enthusiasts, Member Checkers MC.

8/29/03

WEST MOJAVE PLAN

PLEASE GIVE (ALLOW) US MORE TIME
TO READ UP + UNDERSTAND WHAT'S GOING ON
WITH THIS 'WEST MOJAVE PLAN'.

NINETY DAY IS TOO SHORT FOR ME TO
STUDY ALL OF THE INFORMATION OR AT LEAST
SOME OF IT, WITH THE LIMITED RESOURCES
I HAVE, AND WILL AFFECT MANY OF US.

THANK YOU MUCH

TERRY C. CALDWELL
1801 E. COLUMBIA #72
ORANGE, CA 92867

96

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

To Whom It May Concern:

The WEMO plan is the most extensive habitat conservation plan ever developed. I would like to request additional public meetings in the Los Angeles basin where most of the users of the California Desert Conservation Area reside. I would also like to request an extension of the comment period. I ask for these as per Section 5.5 of the Memorandum of Understanding "Role of BLM: Public Participation- Assume lead responsibilities for ensuring adequate public participation by public land users and interest and for overall public participation in the planning effort".

I would like to respectfully insist on a complete survey of the existing routes. The BLM has relied on the 1985-87 survey for its inventory of routes in 11 of the 21 sub regions described in the plan. The 85-87 survey contains no single track trails in the 11 sub regions. Single-track trails do exist even if the BLM has failed to list them.

All routes listed as open in the route inventory should be programmatically approved for dual sport and other noncompetitive events.

I would like to request specific language pertaining to the reopening of the "C" routes surrounding the Spangler Open Area. These C routes are not on most maps because the area they are in is shown with only the routes surveyed in 1985-87. The BLM closed them with the interim closures, thus I expect these routes to be opened upon the signing of this plan.

Please return the Johannesburg triangle back to the open area. The triangle was part of the open area when it was included in the Rand plan. The BLM found no tortoises and it was dropped from the Rand ACEC. I request that the plan leaves the eastern Rands open. The boundary would be R44 to R46 to R43 then south to the boundary. Much of this area excess 20% grade thus, is unsuitable for tortoise habitat.

The number and acreage of the proposed DWMA's (Desert Wildlife Management Areas) is excessive. The proposed tortoise head start area in the Fremont Valley is in an area more suited for recreation as the habitat has been previously impacted by motorized recreation. If you cannot make Fremont Valley an OHV park, then please label it a recreation area and save it for the future.

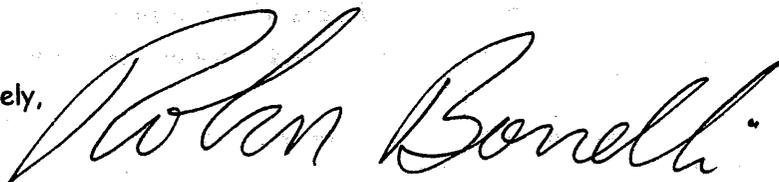
The Proposed Action, Alternative A, includes the Johnson to Parker and Johnson to Stoddard race corridors. It also states that no races will be permitted outside of the open areas. The plan must include specific language assuring that race will be permitted to use these corridors.

I respectfully demand the reinstatement of the Barstow to Vegas corridor. The Desert Vipers have submitted a workable course map each year along with their permit application. A study done in 1974 states soil compaction problems following the '74 race, yet goes on to site heavy rains the week prior to the race, and admitted could be the cause of the soil compaction they noted.

I request specific language allowing dual sport and enduro events on all existing open routes in the DWMA's.

All existing routes should be considered open unless marked closed.

Sincerely,



HBMC

AMA # 506982

August 29, 2003

Barbara Mc Intosh
2400 W. Cajon Dr.
La Habra, CA 90631-6232

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 in 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 vehicles 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,

A handwritten signature in cursive script that reads "Barbara Mc Intosh". The signature is written in dark ink and is positioned below the word "Sincerely,".

Barbara Mc Intosh

August 28, 2003

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

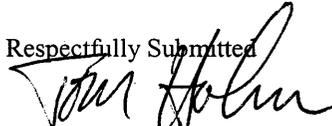
Dear Sirs;

It has recently come to my attention that the West Mojave Plan is under review. I started studying the deferent issues and found them to be quite complex. My family and I have been using the desert in the West Mojave since 1974 for recreational purposes such as off road bikes and club outings. I have always found the people we associate with in the desert to be very respectful of the environment and wildlife.

At this time I would like to make two requests:

1. Please extend the comment period for further study. Ninety days is simply too short a time period to comprehend everything that is involved.
2. Please add two more public meetings in the L.A. area where most of us recreational users live.

Respectfully Submitted



Tom Holmes and family

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

To Whom It May Concern:

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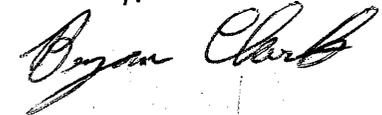
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Sincerely,



September 2, 2003

Page 2

The Honorable William "Pete" Knight, 17th Senate District
The Honorable Sharon Runner, 36th Assembly District
The Honorable Dennis Mountjoy, 59th Assembly District
Supervisor Bill Postmus, San Bernardino County