WEST MOJAVE PLAN
22835 Calle San Juan De Los Lagos
MORENO VALLEY, CA 92553

Dear Sirs
Ninety days is far to short a time for reasonable responses for the West Mojave PLAN.
Please continue the comment period and addition 90 days.

Thank you for your consideration

Stephen A. Freeman
138 S. OAKDALE
RIALTO, CA 92376

Aug 20, 2003

BLM

SUBJECT WEST MOJAVE PLAN.

I HAVE BECOME AWARE OF THE WEMO PLAN AND DUE TO THE DOCUMENT SIZE REQUEST THAT THERE BE AN EXTENSION OF THE COMMENT PERIOD.

THE ADDED TIME COULD BE USED TO CONDUCT TWO ADDITIONAL MEETINGS IN THE L.A. AND ORANGE AREA.

I BELIEVE THAT NONE OF THE PREVIOUS MEETING WERE HELD WHERE THE ACTUAL RIDERS LIVE.

THANK YOU

NED A. JONES
11342 PENNELL CIR
FOUNTAIN VALLEY, CA
92708

MEMBER OF TRAINING MOTORCYCLE CLUB.

Ninety days for comments is just to short a timframe to digest all the documents in the DEIR/S. Please extend the time period

Thanks

Bill VANETTES
411 N. Broadmoor
West Covina CA 91790
District 37 under 35 years

8/20/03

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

Dear Sir/Madam,

Given the size and magnatude of the document under review, in addition to the very short time frame for the public to review the document, I would like to request that the BLM extends the comment period associated with this plan.

Additionally, I noticed that there were No public meetings held in the LA basin (where probably most users of the West Mojave reside). Consequently, please add at least 2 more meetings in the LA basin so the public can be heard.

Sincerely,

Lee Turrini (949) 766-0228

Lee Turrini
28522 Cedar Ridge Rd
Trabuco Canyon, CA 92679

DEAR SIRS,

PLEASE EXTEND THE COMMENT PERIOD OF THIS WEMO AS SET OUT IN DEIR/S. IT HAS TAKEN 30 DAY TO GET THE DRAFT AND HAS TAKEN 30+ DAYS TO READ, PLUS NO TIME TO LOOK AT ROUTES ETC. THIS IS WAY TOO SHORT OF A TIME TO COMMENT ON A PROJECT OF THIS ORDER, SO I PLEAD TO YOU TO EXTEND THIS TIME.

I FEEL MORE PUBLIC HEARING SHOULD BE OPEN IN THE LA BASIN SINCE A MAJOR AMOUNT OF PEOPLE THAT USE THIS AREA LIVE HERE

THANK YOU FOR YOUR CONSERATION

STEVE DILLI
1289 KIMBARL AV
DRUIN CA 92407

8/19/03

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DEAR SIR OR MISS ——

EXTEND THE 90 DAY COMMENT TIME FOR ME TO RESPOND AND EXPAND ON ALSO SHARE MY IDEA WITH FRIEND & OTHERS.

THANK YOU!

TERRY CALDWELL
1801 E. COLLINS #72
ORANGE, CA 92867

Dear sir would please extend
the 90 ~~the~~ day for the
(WEMO) and (DWMA) to anothe
30 Day's for all us Dezert racers.
you need ~~[illegible]~~ to Let
every ~~[illegible]~~ OHV People Know
Thank you
~~Matt~~ Collins
5365 Civetta Lane
Riverside CA 92505

August 20, 2003

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

RE: Comments

My families desert interest is in motorcycle recreation including organized racing. We have been active in the desert since 1967. I believe that the WEMO plan is directed such that it will further reduce our recreational opportunities and that these reductions do not serve worthwhile benefits that justify the reductions.

I believe that the competition routes in the Spangler area that were previously closed should be reinstated.

I believe that the Barstow to Las Vegas Corridor has wrongly been left out of WEMO. It needs to be included.

Further, open routes available for recreational use should also be open for Dual Sport Motorcycle organized events without any additional evaluation or controls needed.

Sincerely

Arthur B Jensen
4673 Via La Primavera
Yorba Linda CA 92886

TO WHOM IT CONCERNS REGARDING THE WEST MOJAVE PLAN,

AFTER READING DOCUMENTATION AND ATTENDING A MEETING ABOUT THE WEST MOJAVE PLAN, I FEEL THAT THE COMMENT PERIOD NEEDS TO BE EXTENDED. DUE TO THE SIZE OF THE DOCUMENTS AND AND THE AMOUNT OF GROUND DESCRIBED IN THE DOCUMENTS I FEEL THE TIME FRAME IS INADEQUATE TO MAKE A FAIR DECISION IN SUCH A SHORT PERIOD OF TIME. I ALSO FEEL THAT THE MEETINGS SHOULD BE HELD TO GIVE ALL AREAS INCLUDING THE VALLEYS AND ORANGE COUNTY A FAIR CHANCE TO HEAR ABOUT THE WEMO AND ROUTE DESIGNATION PLAN. OUR FAMILY RECREATES IN THE DESERT EVERY OTHER WEEKEND WITH OTHE FAMILIES & FRIENDS. THE WEMO PLAN WOULD SERIOUSLY IMPACT ALL OF US. I AM A MEMBER OF AMA, DISTRICT 37, AND SO CAL M.C.

SINCERELY,

JIM BLANKENSHIP
15210 RANCHERO RD.
HESPERIA, CA.
92345

60
revised

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

From: Dave Fisher, Shield F Ranch/Ord Mt. Allotment D.F.
P. O. Box 1837
Barstow, CA 92311

Date: 9/10/03

COMMENTS ON WMP GRAZING STRATEGY

I do not oppose enactment of a WMP. It has always been a good idea as long as it becomes a real HCP, fixes what doesn"t work, with the appropriate nexus between impact and mitigation. Everyone who has worked on it has done an admirable job. It is extremely well written. However, the primary focus is on the parts. We need to take a common sense look at the "whole" of the West Mojave ecosystem.

Some of the following comments and questions involve standards, quidelines and other issues to be decided on in the future; some of which may be influenced by WMP implementation. Responses to them might bring to light other issues. Per our discussions, it is my understanding that I can submit additional comments (if necessary) after our 9/16/03 meeting with the CDCA Range Conservationist.

WMP DECISION-MAKERS MUST NOT IGNORE THE WMP PRINCIPLE:

> "The WMP will ensure that no one group of desert users will be singled out to disproportionately bear the burden of the WMP implementation".

1. Over and above the WMP prescriptions for DWMA's, what future ACEC standards could be added? Quote from 2-113:

> "Activity plans for other uses or resources that overlap an allotment could have prescribed resource objectives that may further constrain grazing activities (e.g., ACEC)".

The WMP may be the least of my concern. What's next?

2. In addition to DWMA requirements, what are Barstow BLM's proposals for implementing Standards and Guidelines and subsequent Health Assessments? In addition to the WMP, in the near future, my operation will be subjected to a myriad of yet undetermined actions. The following (2-112 #8) is only a little less understandable than the rest:

> "In years when weather results in extraordinary conditions seed germination, seedling establishment and

native plant species growth shall be allowed by modifying grazing use."

The opportunities for windshield surveys, inadequately dispersed sampling, various interpretations, subjective decisions laced with non-sensical disconnects (and of course our potential disagreements), are just about endless. Again: What's Next?

3. The EIS alludes to possible future actions/revisions to the proposed Mojave Monkeyflower ACEC, possibly east to Kane Spring area. Could this result in further restrictions?

4. 2-106: A more accurate statement would be - "Where current management differs from that given in Alternative A, the alternative would prevail TO THE EXTENT IT IS CONSISTENT WITH STATUTE AND ESTABLISHED RIGHTS". (See attachments)

5. 2-114: Does the 2002 BO"s "reasonable and prudent measure" requiring "annual authorizations for livestock grazing only if the permittee is in full compliance....." pertain to perennial allotments with long-term authorizations, established preference and associated rights?

6. 2-115: Does "prior approval from the BLM" for "cross-country vehicle travel to remove cattle carcasses" assume a blanket approval for each allotment or a specific authorization prior to each event? If the latter; the typical problems of bureaucracy, weekends, holidays, vacations, etc. etc. will likely render such authorization difficult or impossible to obtain within a 2 day period. If we want dead cows removed, make it easy to do it. The NECO Plan only requires such permission within wilderness areas. Why not the WMP?

7. 2-116: Per discussions at previous meetings, staff included the option for obtaining TNR grazing permits for all terrain above 4500'. A significant portion of the Ord Allotment is above that and a lot more is above the 4000' elevation - normally considered a habitat threshold). We appreciate the response, but as a practical matter, how will either BLM or the ever-present litigious environmental "monitors" know the difference between a 'perennial' vs. a 'TNR' cow, let alone what elevation they're at?

8. 2-116: Please inform us of the statutory basis for imposing an "ephemeral forage production" threshold on a perennial allotment (even if it only pertains to the "Designated Exclusion Area" within the DWMA).

9. 2-117 (LG-14): For sake of consistency, shouldn't the last sentence read; "If cattle must be removed, the operator would be given two weeks to remove them from the DESIGNATED EXCLUSION AREA WITHIN THE DWMA - (not "from the DWMA")?

10. 2-117: A two week period might be too short to even "substantially" move cattle from one place to another in our type of terrain. However, LG-16 may resolve this problem.

11. This draft does not include the following measure included in the 9/27/02 draft:

> "Within two years of WMP adoption, range fences shall be installed in two places to exclude cattle from high concentration tortoise areas found adjacent to the Ord Mt. Allotment (a) along the southern boundary of the allotment, west of the Cinnamon Hills, in northern Lucerne Valley, and (b) along the eastern boundary of the allotment, in the vicinity of Box Canyon..."

Any reason for this omission, or just a computer glich? These fences are referenced in the EIS (4-30).

12. 2-117 (LG-17): Wouldn't the best "grazing strategy" (for the range and habitat) be the implementation of BLM's portion of the Ord Mt. AMP? I have performed my and some of BLM's obligations. 18 years is a long time to wait. Can the WMP be the catalyst?

13. Does the WMP's specified mitigation fee (ie: $770/acre) provide a sufficient incentive for owners of potential mitigation lands within DWMA's to protect said suitable habitat for future mitigation/compensation buy-out? Or could it induce forms of development that promote greater returns, but de-value the environment? Will market forces be allowed to work on behalf of the environment; ie; annual fee adjustments in the Implementation Plan that reflects real land values? Will land acquisition be a high priority for purposes of mitigation/compensation? (Note: we have not fully reviewed this section, but probably won't know much more until the Implementation Plan is approved subsequent to action on the WMP).

14. The ORD DWMA (apparently isolated from other proposed DWMA's with diseased tortoises) does not seem to be targeted for tortoise translocation or "headstarting". Does that mean it currently functions at carrying-capacity?

15. 3-73: Quote:

> If "pervasive land uses, such as cattle grazing, may have severely reduced or eliminated the seed bank and germination potential for High PEP annual plants...then removing cattle from grazing allotments might not be sufficient to support new growth of these essential plants if they have already been eliminated or replaced by non-native forb and grass species."

If this is the case (although not on the Ord Mt. Allotment

after 150 years of grazing - formerly a lot heavier than under current management); does removal of cattle constitute real mitigation?

16. 3-85: If five regions in the Ord-Rodman DWMA "support above-average occurrences of tortoise sign (and therefore tortoises)", what seems to be the problem with continued grazing on the allotment under current AUMs and management?

17. 3-87: Quotes:

> "The Ord Mountains physically separate these three subregions (note: containing the above-referenced five tortoise concentration areas), so that the absence of sign through the middle part of the DWMA may be due to natural causes (ie: fewer tortoises in elevations above 4,500'), or may not have been surveyed.....It is noteworthy that two of the nine BLM permanent study plots occur in the Ord-Rodman DWMA, both in areas of relatively higher density sign counts."

18. 3-89: Quotes:

> "It is noteworthy that the .....Lucerne Valley, and Stoddard Valley study plots showed the smallest population declines during the 10 to 15 years they were surveyed, and are included in three regions that currently support higher sign count areas."

19. 3-91: Quote:

> "Several safe assumptions can be made about tortoise distribution in the western Mojave Desert since the 1970's.....In 1999, only 5 of 609 (0.8%) transects with tortoise sign occurred above 4,000 feet; simarily, in 2001, only 12 of 991 (1.2%) transects with tortoise sign occurred above 4,000 feet. In 1998, all 875 transects were located below 4,500 feet."

The above statements indicate more than a few "disconnects" in the logic applied to the Plan's impact/mitigation relationships.

20. 3-99: If non-native annuals "serve as fuel for wildfires" (which they undoubtedly do) and if native desert vegetation did not evolve with fire (which it didn't) - and thus can be destroyed by fire (which it can); then wouldn't certain types of grazing help solve this problem better than mechanical or chemical measures? What is the additional cost of fire prevention/suppression that may be required due to cattle removal or reductions?

21. 3-133: Why does the WMP propose the perpetuation of the Stoddard to Johnson Valley Competitive Event Corridor? The

following quote very closely matches my observations:

> "LaRue (1994) found that 22 event-related tracks left the route for a total linear distance of 1.074 feet....Although the BLM employed 10 rangers, eight observors, and one helicopter between 24 and 26 November to enforce the closure of 119 square miles of desert that encompassed the corridor, LaRue (1994) still found 23 motorcycle tracks, 13 truck tracks, and 5 quad-runner tracks that were not caused by the racers. He concluded that the tracks were probably associated with monitors or unauthorized use by the general public".

This event traverses the heart of my allotment, including one section of my private land. Was a County 'special event' permit ever obtained for the use of private lands for this event? Was my liability as a land-owner indemnified by BLM or the race sponsor? The above-referenced tracks degrade forage - my cows have to be "mitigated" - but this event doesn't? Please refer to the above-referenced WMP "principle".

22. 3-152: If it is determined in the future that winterfat/hopsage habitat within the Ord Mt. Allotment accommodates Mojave Ground Squirrel populations, would any new prescriptions be applied in addition to those currently proposed for tortoise?

23. 3-168: DFG expert Dick Weaver determined in the early 1970's that bighorn were not utilizing the Ord Mountain region (see attachments). Since I have rehabbed/improved springs and seeps and have added groundwater sources, populations have returned, achieving "lambing" status. They drink with the cows. There are no bovine/sheep disease relationships. What happens if my cows and I leave? Who then becomes the land steward?

24. 3-207: Quote:

> "Usually these conditions have been developed in consultation and cooperation between BLM and the livestock operator in the form of an allotment management plan or other planning effort".

So, when will BLM complete its obligations for the 19 year-old Ord. Mt. AMP? Table 3-45 indicates a "completed" AMP. Is it "complete" when the paperwork is done, or when it is fully implemented?

25. 4-17: Quote:

> "Until such time as critical habitat boundaries are modified to conform to DWMA boundaries, a management problem could exist. Interim measures are not identified to resolve forseeable conflicts where critical habitat

would occur outside DWMA's and non-critical habitat occurred inside DWMA's. It is unknown how USFWS' 'adverse modification' determination would apply to non-critical habitats in DWMAs".

What are the implications, if any, for the Ord Mt. Allotment? I need to know now.

26. 4-28: Feral Dog Management - GOOD IDEA. Both for cattle and wildlife. I've done my share. Now it's your turn.

27. 4-30: Quotes:

> "Exclusion Areas are based on protecting higher density areas in DWMA's where cattle allotments overlap. Consequently, it would concentrate cattle in suitable habitats that currently support lower densities. For the conservation strategy to function, tortoises must be protected in higher density areas (accomplished) and facilitate repatriation in lower density areas (not accomplished, and possibly less likely due to concentrating cattle use)."

If "exclusion" doesn't work to benefit the whole of the population, why do it? It's diffcult for all of us.

> "The 230 pound/acre threshold was developed on the basis of studies conducted in the East Mojave. Such studies have not yet been undertaken in the West Mojave. Thus, its applicability to cattle allotments in the West Mojave, and its likely success in reducing competition for limited forage, will remain UNCERTAIN (emphasis added) until the "Avery-like" study is completed."

Uncertaintity doesn't make for a sustainable impact/mitigation nexus. It is therefore premature to require it.

> "Although new fences would minimize cattle trespass, they would also serve to concentrate cattle grazing on the Ord-Rodman Allotment where it overlaps with the DWMA."

No easy answer for this one.

28. 4-44: Quote:

> "There are also some weaknesses associated with Alternative A: .....fails to minimize potentially significant impacts of cattle grazing...It would apply the "Exclusion Area" concept and ephemeral forage thresholds, neither of which is likely to minimize impacts to important habitats nor avoid competition over limited forage between cattle and tortoises...."

Same comments as above - no nexus/no mitigation?

29. 4-95: Quote (economics):

> "Theoretically, the maximum direct impact associated with the HCP program is defined by the proportionate share of agricultural sector employment directed to stock production. This maximum theoretical impact exceeds the probable worst-case effect associated with the HCP program because BLM grazing leases will be recognized until such time as voluntarily relinquished by area ranchers."

The leases may continue to be "recognized", but the consequences of WMP and other prescriptions will likely put the ranchers out of business (see below). Therefore, this statement should be amended and the level of economic "significance" determined accordingly.

30. 4-98: This section basically says that the application of Standards and Guidelines, compliance with the terms of the 2002 CDCA Plan BO, and the new management prescriptions proposed by the WMP (especially within DWMAs) will very likely put all West Mojave ranchers out of business. We can at least appreciate the honesty. You're probably right. However, the real test is how adequately monitoring is accomplished, data interpreted, etc.

Alternative A contains:

> "changes in wording and the guidelines are more specific to this region, but do not differ significantly from the fallback standards and guidelines. There are no anticipated additional impacts on existing livestock opoerations that would result from implementation of these measures, except the reduction in the utilization thresholds...This stipulation (25% utilization) could cut stocking rates in half, and result in downward adjustments to the permitted use on some allotments...the implementation of this action on good and excellent condition allotments that are achieving the regional pulbic land health standards may unfairly impact operations that have demonstrated good steweardship, and have little to no benefit in the recovery or conservation of covered species."

We need to fully understand any such differences now, as "insigificant" as they may be.

31. 4-100: Another inconsistency. If the initial statements in the WMP draft are correct; below the 230 lb. threshold, grazing is to cease within the EXCLUSION AREAS OF THE DWMA, not from the entire DWMA or "public lands".

> "Two consecutive dry years would effectively put most of the affected grazing lessees out of the cattle business"

Likely YES, under the scenario described. However, here is another example of the disconnect from basic reality: We have been subjected to even more than 2 dry years in a row - the cattle are still here - so are the tortoises with sufficient habitat and populations to be designated a DWMA.

32. 4-226: Quote:

> "It is not clear how cattle grazing relates to disease transmission, although available data suggest that there have been no older or newer die-offs in cattle allotments, per se."

Good. It confirms my observations throughout the years.

33. The WMP should provide basic quidelines for future BLM consultations with ranchers within the WMP re: future utility rights-of-ways, OHV events, route designation and other projects on Federal lands that will, in any way, affect grazing operations.

34. Please provide an analysis of the distinction between 'public' vs. 'federal' lands and how it may affect application of WMP prescriptions on the Shield F Ranch/Ord Mt. Allotment.

ATTACHED: Various statements and letters related to the WMP grazing strategy.

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City of Lancaster

44933 North Fern Avenue
Lancaster, California 93534-2461
661-723-6000

Frank C. Roberts
Mayor

Bishop Henry W. Hearns
Vice Mayor

Jim Jeffra
Council Member

Ed Sileo
Council Member

Andrew D. Visokey
Council Member

James C. Gilley
City Manager

August 26, 2003

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

RE: Comments on Draft Plan and EIR/S

The City of Lancaster has reviewed the proposed documents and is supportive of the proposed project. The City believes that the plan will establish a framework that provides for consistency in the application of mitigation requirements for impacts to plant and animal species, and habitat. Further, the plan defines habitat conservation areas that provide for the long-term recovery and vitality of a diverse group of species, rather than the current fragmented approach to impact mitigation.

The City does, however, have two comments relative to the plan that we believe should be addressed:

1. The current conservation strategy for the Alkali mariposa lily provides for a defined long-term conservation area on the west side of Edwards Air Force Base and additional potential areas to the south and west of the base. The City of Lancaster recommends that the proposed plan be amended by expanding the defined conservation area to include an area approximately 1 mile in width along the southern boundary of Edwards Air Force Base instead of creating potential future conservation areas that do not have a clear status.

2. Areas of Eriastrum hooveri (Hoover's woolly star), a federally listed species, have been confirmed within the City of Lancaster. Although this plant is proposed for delisting, the City feels that it should be addressed and included with the West Mojave Plan. Information from various biologists indicates that the woolly star can be expected to occupy habitat similar to that occupied by Alkali mariposa lily; therefore, the City would recommend that the defined conservation area for the Alkali mariposa lily also serve as conservation area for the woolly star.

Thank you for this opportunity to review and comment on the proposed plan and related environmental documents. Should you have any questions, please contact me at 661-723-6105.

Sincerely,

Brian S. Ludicke

Brian S. Ludicke
Director of Community Development

BL:ad

printed on recycled paper

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Date 08/18/03

Name Haruki H. Yoshizumi
Address 3335 Aramis Dr.
San Jose, CA 95127

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.

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 DWMAs (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,

Gary S Beck

HBMC

AMA# 554495

(1)

BLM CALIF DESERT DISTRICT OFFICE
22835 CALLE SAN JUAN DE LOS LAGOS
TO WHOM IT MAY CONCERN

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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 CALIF DESERT CONVERSATION 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 RESPONSIBILITYS FOR INSURING ADEQUATE PUBLIC PARTICIPATION BY PUBLIC LAND USERS AND INTERESTS AND FOR ALL OVERALL PUBLIC PARTICIPATION IN THE PLANNING EFFORT.

(2)

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 AN OTHER NON COMPETITIVE EVENTS.

(3) I WOULD LIKE TO REQUEST SPECIFIC LANGUAGE PERTAINING TO THE RE OPENING 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.

(4) 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 RANK ACEC. I REQUEST THAT THE PLAN LEAVES THE EASTERN RANGE OPEN. THE BOUNDARY WOULD BE R44 TO R46 TO R45 THEN SOUTH TO THE BOUNDARY. MUCH OF THE AREA EXCESS 20% GRADE THUS IS UNSUITABLE FOR TORTOISE HABITAT

5

THE NUMBER OF ACREAGE OF THE PROPOSED DUMAS (DESERT WILDLIFE MANAGMENT AREAS) IS EXCESSIVE THE PROPOSED TORTOIS HEAD START AREA IN THE FREMONT ~~AREA~~ VALLY IS IN AN AREA MORE SUITED FOR RECREATION AS THE HABITAT HAS BEEN PREVIOUSLY USED BY MOTORIZED RECREATION. IF YOU CANNOT MAKE THE FREMONT VALLY AN OHV PARK, THEN PLEASE LABEL IT A RECREATION AREA AN 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 RACE WILL BE PERMITTED OUTSIDE THE OPEN AREAS. THE PLAN MUST INCLUDE SPECIFIC LANGUAGE ASSURING THAT RACE WILL BE PERMITTED ~~THEN BE PERM~~ TO USE THE CORRIDORS.

(6) I RESPECTFULLY DEMAND THE REINSTAMENT 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 STATE SOIL COMPACTION PROBLEMENS FOLLOWING THE 1974 RACE, YET GOES ON TO ~~SAYE~~ STATE HEAVY RAINS THE PRIOR WEEK OF THE RACE AND ADMITTED COULD BE THE CAUSE OF ~~THE~~ SOIL COMPACTION THEY NOTED.

I REQUEST SPECIFIC LANGUAGE ALLOWING DUAL SPORTS AND ENDURO EVENTS ON ALL EXISTING OPEN ROUTES IN THE DWMA,S

ALL EXISTING ROUTES SHOULD BE CONSIDERED OPEN UNLESS MARKED CLOSED.

SINCERELY ROY WILTON
19240 MANELA Rd
APPLE VALLY CA
92307

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DEPARTMENT OF PUBLIC WORKS

FLOOD CONTROL • GIMS • REGIONAL PARKS • SOLID WASTE • SURVEYOR • TRANSPORTATION

COUNTY OF SAN BERNARDINO
ECONOMIC DEVELOPMENT
AND PUBLIC SERVICES GROUP

SOLID WASTE MANAGEMENT DIVISION
222 West Hospitality Lane, Second Floor • San Bernardino, CA 92415-0017 • (909) 386-8701
Administration/Engineering/Solid Waste Programs Fax (909) 386-8900
Fiscal Section/Operations Fax (909) 386-8786

KEN A. MILLER
Director of Public Works

PETER H. WULFMAN
Solid Waste Division Manager

August 27, 2003

Mr. William Haigh
Bureau of Land Management
California Desert District Office
22835 Calle San Juan De Los Lagos
Moreno Valley, California 92553

Dear Mr. Haigh:

The County of San Bernardino Solid Waste Management has taken note of the Habitat Conservation Plan prepared for West Mojave. The Division has a specific interest in the Plan as regards the projected build out of the landfill at Barstow. The County has worked closely with BLM over a period in excess of 25 years regarding this matter; first, under a continuing Recreation and Public Purposes Act (R&PP) lease and culminating in the period between 1994 and 2001 in the passage of fee title on both the existing and expansion areas from the Federal government to the County.

We appreciate that the input and position given you by our consultant relative to the build out not being in conflict with the HCP has been noted in the draft at page 2-65 (DT-27). We urge this language be continued into the final HCP.

We noted, however, with concern, that the Draft Plan at pages 3-254 and 4-39 continue to show the current operation and build out area within the proposed (and planned for) adoption Desert Wildlife Management Area (DWMA).

The area that includes the build out tract was included as critical habitat in the designation of the Ord-Rodman Recovery Unit by the FWS in 1994. The Service apparently used State Highway 247 for that boundary. At that time BLM surface ownership maps would have shown the tract as public land. Since that time the tract has become private through the action of BLM in 2001.

Through participation in the HCP processes it has been our understanding that the critical habitat boundary would be modified as an outcome of the HCP to conform to the adopted DWMA boundaries. It was also our input at scoping meetings that the language accommodating the build out, as expressed on page 2-65 would be carried through to a boundary adjustment in the DWMA so that this part of the County's Long Range Solid Waste Management Plan could be carried out without conflict. The language contained on page 4-39 indicates that no such change has been made. We request that the build out area that is

WALLY HILL
County Administrative Officer
JOHN GOSS
Assistant County Administrator
Economic Development and
Public Services Group

Board of Supervisors
BILL POSTMUS ..... First District
PAUL BIANE ..... Second District
DENNIS HANSBERGER ..... Third District
FRED AGUIAR ..... Fourth District
JERRY EAVES ..... Fifth District

Recycled Paper

private land be excluded from the DWMA and from critical habitat. This can be easily done as a notch since the County's property extends to Highway 247.

The County is preparing a separate HCP and is preparing to enter Section 10(a) consultation with FWS in the near future regarding these build out plans. Our negotiations relative to implementation, compensation and mitigation will be far clearer if the 480 acres is excluded by actions in the West Mojave Habitat Conservation Plan. Please note that the County has already compensated BLM for the land transfer by granting BLM title to 65 acres within the Superior-Cronese Proposed DWMA.

Sincerely,

Peter H. Wulfman
Division Manager

PHW: js

cc: The Honorable Bill Postmus, First District Supervisor
Michael E. Hays, Director, Land Use Services Department
Gerald E. Hillier, Quadstate County Government Coalition

V:\Peter\Haigh~BLM 08-27-03.doc

~~AMERICAN ASSOCIATION OF AIRPORT EXECUTIVES~~
~~601 MADISON STREET~~
~~SUITE 400~~
~~ALEXANDRIA, VA 22314~~
~~703 824-0500~~
~~FAX: 703 820-1395~~
~~www.airportnet.org~~

930 Crescent Drive
Barstow, CA 92311
August 18, 2003

Dear Mr Haig,

Have the locations of ordnance contaminated sites previously plotted as part of the WEMO plan development been cross-referenced to the DoD Report released in June to make sure all known sites are identified in WEMO?

Sincerely,
Gloria Trout

THURSDAY, JUNE 5, 2003

Report: Ex-military sites need cleanup

By DAVID WHITNEY
Scripps-McClatchy Service

WASHINGTON — The Defense Department said in a report this week that 160 former military sites in California have unexploded bombs and shells that pose public safety risks and will cost an estimated $2.3 billion to clean up.

Seventy-nine additional sites were identified at installations still being used by the military that will cost another $4.3 billion in cleanup costs.

The information was contained in a report ordered last year by Congress and is the first detailed listing of sites where old ordnance that threatens the unwary has yet to be removed. The listings also include sites that are contaminated with toxic substances related to the munitions.

The report said roughly 138 other locations in the state have been cleaned up, secured or determined not to pose a risk after thorough investigation.

Many of the sites are former bomb, artillery or gun ranges. But other locations remain open to public access, with higher risk assessments.

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August 26, 2003

To Whom It May Concern:

The introduction of motorized vehicles into the ACEC area of Juniper Flats is in disregard to the intent of the area. Specifically the route described in Table 1 "Proposed specific Modifications of Designation Project Route Network" under the heading DR.2 Decision, PPA.2.2.2 Designation Project EA and Amendment Errata, which states:
P_Map_69 – J1299 – Open undesignated route originating from the intersection of J1085/J1029 – Route provides important connectivity through BLM lands to USFS lands bypassing private property where trespass use has been an issue.
It is important that this route and all illegal motorcycle routes must remain closed and rehabilitated in the Juniper Flats ACEC. This route, as well as other illegal motorcycle routes did not appear on the original maps for public comment. In addition, the Juniper Flats Road provides important connectivity from the BLM lands to J1003 and on to the USFS lands. The new route, now designated as J1299 is a redundant route, and one that will encourage trespass onto private property as well as into Cottonwood Springs. A parking area was created at great expense after the Willow Fire so that people can hike or ride horses into the riparian area. Authorizing a motorized trail along this fence and around Cottonwood Creek negates all the previous efforts to conserve the important resources in the area.

Thank you for your consideration

Elaine Eberle

Elaine Eberle
21435 Kenora Court
Apple Valley, CA 92308

Roxie.
Please get a copy to Larry LaPre. TA

TO		INT	DATE
	AM	R	8/27
	ADMIN		
R	RES		
	REC		
	LEO		
	FMC		

RETURN TO: Case file

RECEIVED
BUREAU OF LAND MANAGEMENT
03 AUG 27 AM 10: 54
BARSTOW FIELD OFFICE
BARSTOW, CALIFORNIA

68

Mike Childress
5698 Lodge Pole Dr.
PO Box 186
Wrightwood, CA 92397

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

The West Mojave Plan is a complicated plan derived from unsupported theories, incomplete studies, and is in violation of NEPA through failure to *"devote substantial treatment to each alternative considered in detail so that reviewers may evaluate their comparative merits"*. This plan also violates the National Environmental Policy Act by failing to "*provide a clear basis for choice amongst options*"

There is no documentation given in the administrative record showing any method of the analysis used to determine which routes would be closed and gives no justification for their closure. Many routes need to be added back into the inventory and by leaving them out of the inventory, they will just fall through the cracks and be closed by simple failure to include them for consideration and study.

I am a member of the AMA District 37. My family has been involved in recreational use of the desert both in competition and for personal pleasure for several years and will be directly affected by this plan should it be approved. I race motorcycles in competitive events and know first hand the amount of money that is spent just in the motorcycle industry alone that benefit the economics of California.

It is estimated by the Motorcycle Industry Council that about six billion dollars annually flows into the California economy. What will happen to California's already struggling economy should the use of public lands be diminished to the point where it is no longer financially advantageous to operate a business geared toward motorized recreation in California? It will either cause the business to go under, or to follow so many others out of California and give those billions of dollars to another state willing to support off-road recreational and competitive events use.

Many of the studies regarding the DEIR/S have not been complete. Out of the 23 sub regions, only 11 of those regions have been fully surveyed. Much of the supporting documents of the DEIR/S have no real science or support in that the reduction of motorized recreation will contribute to the survival of the desert tortoise. Their theories are supported many times by speculation. A plan such as this one cannot be approved or granted by these kinds of supporting documentation.

Ravens are a major cause of the dwindling tortoise population. Why hasn't the BLM used these last 20 years to start a breeding program instead of shut down public lands owned by the American people? It would seem a better idea to immediately begin the breeding programs to ensure the population growth while all of these studies are being "conducted" to attempt to prevent them from being run over.

There are too many other considerations to look at to prevent the demise of the desert tortoise than to allow the BLM to spend millions compiling incomplete evidence, old studies and basing supporting theories compiled of speculation at the cost of the taxpayers that will ultimately prevent the American people from enjoying the public lands; the very people who are the ones contributing to the economy of California by their use of the public lands.

Sincerely,

Mike Childress

Cc: Bill Howell
District 37 WEMO Coordinator

Lori D. Tracy
PO Box 186
Wrightwood, CA 92397

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

Re: WEMO

I am writing to you to ask that you extend the deadline for the comment period in the West Mojave Plan. The public has not had ample time to be informed of this plan and to do that, would take much longer than the September 12, 2003 deadline. No public meetings were held in the Los Angeles area, where so many of the recreational area users reside. Please add a minimum of two meetings in that area so that the public may have an opportunity to be heard.

Much of the documentation supporting the DEIR/S wasn't published. Out of 23 sub regions, only 11 were surveyed fully and the rest relied on the 1985-87 survey. It would only serve the public well to provide a complete survey. Much of the conclusion drawn as to the dwindling population of the desert tortoise is supported simply by speculation. Documentation should be verified as to their sources and support conclusions. District 37 of the American Motorcycle Association has compiled 1.4 million miles of travel without the loss of a single turtle. The post event reports show there has been little or no habitat destruction.

Raven's are certainly preventing any tortoise survival program from success and if the BLM would go ahead and begin captive breeding of the tortoise, along with some type of control of the Raven population, it could be an alternate plan instead of closure of millions of acres of public lands.

Recreational use of our public lands is one of the activities that help prevent America's young people from becoming involved in crimes and drug use. When children have interests or hobbies that keep them from becoming bored, they mature into productive adults. To close millions of acres of the desert areas will lead to the restricted activities that we as Americans can become involved in. I believe that people, plants and animals can all have a balance on this earth and that all can survive. I am asking that you give more time for the public to become aware of this plan, to take action and be heard by extending the comment period far beyond the current September 12, 2003 date.

Respectfully Submitted,

Lori D. Tracy

8/31/03

WEST MOJAVE PLAN...

HELLO... I USE SOME OF THESE AREAS BEING CLOSE OR HAVE BEEN CLOSE ABOUT 20-30 TIMES A YEAR, WITH ME & MY FAMILY'S; COMPETITION MOTORCYCLE, DUAL SPORT MOTORCYCLE, & OFF HIGHWAY JEEP & TRUCK.

THIS IS ONLY MY LIMITED VIEW ON THIS, BUT IT DOES NOT LOOK OR FEEL LIKE OTHER MORE POPULAR AVENUES OR IDEAS HAVE BE BROUGHT TO LIGHT OR CONSIDERED. NOT THAT THE WORK ON "W.E.M.O." WASN'T GOOD BUT MAYBE THE PEOPLE WHO USE THE AREA ~~IDEAS~~ MAY HAVE IDEAS WHICH MAY WORK TO THE SAME GOAL WITHOUT CLOSING OUR RECREATIONAL AREAS.

POSSIBLE BREADING MORE OF THE LITTLE CRITTERS (TORTOISES) & MAYBE A BOUNTY ON THE RAVEN WHO LIKE TO EAT THERE NEIGHBORS.

IF I MAY I WOULD LIKE TO LIST A FEW OF MY HOPES FOR "W.E.M.O."

- REOPEN ROUTE C AT RED MT./ SPANGLER OPEN AREA HILLS

- ROADS SIDE BY SIDE OF EACH OTHER ~~SH~~ TO BE RE-OPENED, SOME CLOSE ROADS ARE MUCH EASIER TO BE OKL

- ALLOW A ROUTE THUR FREMONT RECREATION AREA TO SPANGLERS HILLS + EL MIRAGE AREAS

- CINNAMON HILLS AS IN ALT. E WOULD LIKE TO HAVE 'C' ROUTE CREATED

- ALSO TAKE MONEY FUNDS FOR USE BY GREEN STICKER + DAY USE PEOPLE FOR THESE AREAS

- "BASIC SPEED LAW" ALLOWED FOR MOTORCYCLE DUAL SPORT RIDES

- I DO NOT LIKE THE 'DEIR/S' IT LEAVE LITTLE ELSE. ALTS A THUR E HAS THE GOOD IDEA IN THE TORTOISE CRITICAL HABITAT "ADOPT EXISTING DESIGNATED NETWORKS ELSEWHERE"
  - TRAILS + ROADS SHOULD BE LOOKED AT ONE BY ONE AND NOT ALL CLOSED; OTHER ITEMS MAY BE ~~[illegible]~~ AS EFFECTIVE
  - MORE ROUTES / THE PROPOSED OFFERS NO CHOISE

- THE DEIR/S DOES NOT HAVE SUPPORTING DATA IN ALT. A THUR E TO REDUCE OPEN ROUTES IN THE 'ACECs' IN LARGER POPULATED TORTOISE AREAS. ALSO THERE HAS BEEN LITTLE DATA/REPORTS TO SHOW CAUSE + WHY ROUTES WERE CLOSED OR TO BE CLOSED

THANK YOU FOR ALLOWING MY INPUT TO BE HEARD...

TERRY Caldwell

TERRY CALDWELL + FAMILY + FRIENDS
1801 E. COLLINS #72
ORANGE, CA. 92867

Roy Don Moore, Vice President
Checkers Off-Road
PO Box 186
Wrightwood, CA 92397-0186

August 30, 2003

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

Re: WEMO

In regard to the WEMO a two stage process of Route Designation and Plan Amendments of the 1980 West Mojave Management Plan, I have major concerns and will outline them below.

Route Designation - Inventory and designation of (closed or open) routes for the existing roads and trails within the millions of acres in the Mojave Desert (PUBLIC LANDS).

Listed below are the areas of concern and the reasons for concern.

a. **The Fremont Recreation Area** - It should be connected to El Mirage and Spangler open areas using the routes already existing. "C" routes at Spangler were only a temporary closure. Routes should be back on the inventory list.

b. **Johnson to Parker** - These are shown as open routes. THE DEIR/S is pro-Posing that no competitive events be allowed outside of those open areas. If I understand correctly, Congress has allowed for "point to point" events.

c. **Barstow to Vegas -** This corridor was deleted in NEMO. It should be back on the inventory list.

Reduction of routes should not take place until closures are determined on a case by case basis with analysis of routes that will support actual detrimental affects. There should be alternates considered chosen from existing routes. The way it reads now, there is no alternative choice. The DEIR/S violates the National Environmental Policy Act by failing to provide a clear basis for choice.

My family and I are frequent users of the desert for competitive events. I am the Vice President of the Checkers Off-Road; a club formed of racers and pit crew people. Has anyone given any consideration to the trickle-down affect of the California economics will suffer if Americans are overly restricted to use of the desert in competitive events?

This is a multi-billion dollar industry that will either close their doors or move out of state and contribute to the economy of another state. California cannot afford to lose more industry and cash flow. The people of California are already over-restricted and pay higher costs of living than in most states. They are moving away as are the businesses just to be able to thrive. This will only contribute to this movement and create an even higher degree of economic stress for California. I believe that the Study of Economic Impacts, (pgs 4 - 96 and 4- 97) grossly underestimates the economic benefits that the off-road industry contributes annually to the California economy.

In addition, more time is needed to comment on this plan (a plan in the makings for over 20 years) and I would like to see the time frame extended. At it stands now, people only have until September 12, 2003 to comment and that is not sufficient time for a plan of this magnitude.

Respectfully Submitted,

Roy Moore

Roy Moore, Vice President
Checkers Off-Road

8/30/03

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

From: Jeffrey W. Heine
7025 Quito Ct.
Camarillo, CA 93012

Subject: Comments on West Mojave Plan (WEMO)

My friends, family and myself use the West Mojave for various recreational activities including hiking, camping, exploring and riding motorized vehicles. Over the years, these recreational adventures have provided some of my most enjoyable experiences and produced many fond memories. I am quite concerned about the magnitude of conservation sections contained in the plan and the effects they will have on keeping the West Mojave open for present and future generations, so they too can enjoy the use of these wonderful public lands.

First off, I would like to ask for an extended comment period to allow for additional time to pour through the document. I understand that there were public meetings held in the West Mojave area but would suggest having a few in the Los Angeles area where most recreational users reside. This would allow for more public comments to be heard.

On the use of fences, why do we fence in/out people and animals? I can see the common sense in private property using fences but not public land. Fences hinder safety and fire personnel from doing their jobs, are huge eye sores, endanger humans and animals, cost a fortune to install and then must be maintained. Why should we create this problem? I suggest minimal use of fences, or better yet, the elimination of them. Tax payers dollars should not be wasted on these money pits.

On the subject of routes, the philosophy should be "routes should be considered open unless a sign says closed". This is how traffic normally works as we are free to travel unless specifically signed to not proceed. Please incorporate this into the final document.

Dual sport rides are a great way to let people experience our great US lands and enjoy all the beauties that the West and East Mojave's behold. All routes designated as open should be automatically approved for dual sport use and no further environmental assessment or monitoring should be required for organized tours. On a recent organized dual sport ride this year I witnessed an enormous presence of monitoring by Forrest Rangers/BLM and couldn't help but think to myself that these valuable resources have more important usage.

The last comment that I would like to make concerns the connection routes between Fremont Recreation Area and Spangler & El Mirage open areas. These connections should be open using existing routes to allow free access between the areas.

Thank you for considering my comments,

Jeff W. Heine

Jeffrey W. Heine

August 31, 2003

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

Thank you for the opportunity to comment on the West Mojave Plan. I have an interest in the recreational use of our public desert lands.

I, also, realize that you are tasked with a difficult balancing act. There are several points that I would plead that you and your staff consider.

The vast content of the document is quite difficult to digest. Could you, please, extend the time for public comment to ninety days as opposed to the short sixty day period? I am confident that this would work well for my interest and your concerns as well.

On review of the desert wildlife management areas for the desert tortoise, it is quite apparent that the management costs are outrageous during a time when we must all tighten our fiscal belts. The fence option is too costly. It is well known that tortoise management would require the demise of the raven bird, who is the perpetrator of the damage to the tortoise population.

You and I both know that a great deal of the support information was not backed with any science and or facts. This is particularly true in the route designations. The ban on motorized recreation on many trails and or roads has no impact on tortoise recovery. Much of the data in the document is speculation as the word "may" is indicative of. Why would the fact that of twenty three sub regions, only eleven surveyed. The other twelve relied on 1985-87 survey data that included no single track trails.

The used public should not be required to suffer non-use because the Bureau Of Land Management did an incomplete task of route inventory.

I insist that this be completed and updated. It is very obvious that the cost of management tasks are high and that much of the closed desert could be opened again with management targeting real pristine areas.

CONCLUSION:
1. Alternative E can be explored.
2. Open the Barstow to Vegas corridor.
3. Re-open C routes in Spangler open area
4. West side of Camp Rock Road Cinnamon Hills open.
5. The recreation business in Southern California would benefit as will the small desert communities as recreations do spend money.
6. The land is our property to use.

Thank You for any serious review of your document and consideration of my concerns.

Thomas Warren Edmonds
10003 Huntington Downs Ave.
Bakersfield, CA. 93312

Telephone: (661) 587-7994
Fax: (661) 587-7332
E-mail: edmonds12@aol.com

Thomas W. Edmonds