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California Desert District Office
Attn: WMRNP Plan Amendment
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1/25/16

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RE : WMRNP Plan Amendment

If these comments seem confusing to you – it is because we are confused. We're not sure what this 'project' is and how to respond. We haven't been sent or didn't receive a new? 'Plan' to know how it differs from the draft we previously commented on. In addition, the mapping is no clearer than what was in the first submittal or in the DRECP.

We assume it is a re-opening of WEMO in reaction to CBD's lawsuit on the original WEMO Plan. If the multitude of squiggly lines simply denote 'existing roads/routes' on the BLM parcels – and have been verified to actually be there on the ground – then it's just a map of what's there – so OK. But, if the intent is to officially designate them as 'Open OHV Routes as part of this 'decision' – if this is a 'decision' – it's certainly NOT OK. Most if not all of the so-called roads or routes likely extend onto adjacent, private lands. OHVs traversing these BLM routes won't know when public land ends and private parcels begin – exacerbating vehicle trespass on private lands, the multitude of roads

within rural residential land-uses, and of course OHVs on County-maintained roads where only street-legal vehicles are allowed. To reiterate our previous responses : This aspect of the 'Plan' is too overwhelming to make specific comments. The rationale for the doubling of routes since the 2006 Plan based on 'new inventories' infers that the 2006 Plan was way off base – which is hard to believe. Are these 'new found' routes really there – on the ground – are they really 'routes' ? Many of them look so disjointed – so short – some so remote – with no links to other roads – are they really usable ? It looks as if there will be conflicts with County-maintained roads – with more 'opportunities' for green-sticker OHVs to use said roads in violation of the 'street legal' requirements – creating a major problem for the County Trans. Dept., law enforcement, residents (private land trespass), etc. It would definitely be inconsistent with the County's OHV Ordinance and Vision Statement. BLM's supposed rationale that - even with the increase in 'routes' – there will be 'no net increase in use or OHV miles travelled' - is bewildering – defying common sense.

If this so-called 'Plan' rendition also deals with grazing – we endorse BLM's Preferred Alternative (from the draft) - to maintain the existing grazing allotments in the W. Mojave intact – operating pursuant to existing status – with existing AUM allocations – with the normal 10 year authorizations. We question the need to raise the dry weight threshold. Ranchers will deal with drought conditions long before the time comes to measure ephemerals. Any reduction or elimination of grazing rights would not only be an adverse 'taking' – it would violate the hard work and agreements between BLM and the ranchers over the years – with the realization that these allotments could eventually become mitigation/compensation for impacts from other projects within the region – an important option for ranchers if they so desire. We would support re-entry of grazing into vacated allotments in the W. Mojave if they have not been officially 'relinquished' for Fort Irwin's expansion. It is important to note that existing 'approved' routes

within the allotments currently create trespass/vandalism problems. Those routes added in Alt. 3 (draft) in both Ord and Rattlesnake Allotments will make the situation worse for both the ranchers and BLM. We oppose the addition of any 'open' routes within said cattle allotments.

Did BLM do 'CCC' with the County – especially 'coordination' in drafting this Plan – or is that yet to come in the form of pending 'Travel Management Plans' (which we heard would constitute the actual route designation process)? LVEDA believes that the only productive way to better understand and deal with the route issues would be to meet with both County reps. and BLM – get a better understanding of what's really in the plan – view maps that are readable with topo features, etc. - BEFORE any final decision is made.

BLM must also work with local communities/groups in making substantive decisions on any (what we heard to be) "Activity Plans" in specific areas. Although it's probably explained somewhere – we don't understand the distinction between an "Activity Plan" vs. a "Travel Management Plan". The Lucerne/Johnson/Apple/Morong Valley communities have created a great organizational network (thanks to having to deal with all the renewable energy projects adversely affecting us) to help BLM in this process. We work with the County Sheriff Department's Rural Crimes Task Force and OHV Task Force and both would like to participate. We have a good working relationship with the Barstow Area office and sincerely hope that it will have the authority to make said decisions within its jurisdiction.