

WEMO Route Network Travel Project**Comment Period Deadline: June 14, 2018**

June 1, 2018

by Lisbet Thoresen

THE WEST MOJAVE (WEMO) ROUTE NETWORK PROJECT (WMRNP) is a longterm **BLM** project that has involved hundreds, if not thousands of people providing input. **WEMO's** footprint covers 3.1 million acres containing nearly 16,000 miles of routes. There are two weeks remaining in the comment period for what will become the final travel management plan containing all legal motorized routes on public lands within **WEMO's** boundaries in Southern California's deserts.

There are four alternative plans, including one no-action plan available for comment. It is important for Rockhounds to review **BLM's** four proposed alternative plans and submit comments by June 14th. Motorized routes of access to hobby collecting areas that are left out of the final plan will be off limits in the foreseeable future. Destinations without vehicular access will make it impossible for many Rockhounds to visit them. Areas to park near collecting areas also need to be called out.

**Data accuracy & usability
of the WMRNP maps**

In the [May bulletin](#), **Kim Erb** and I reported some problematic issues and questions that we encountered using **BLM's** maps. There are two versions available for comment: a set of geo-referenced PDFs (<https://goo.gl/Pkm2X9>) and an interactive online map (<https://goo.gl/g7oYLF>). After seeking answers, or at least clarification, to our questions with **BLM's** project coordinator **Matt Toedtli**, some remain unresolved.

Other Stakeholders have encountered some of the same problems that we observed, with usability/user-friendliness of the maps and accuracy of the data being common denominators. Several conservation groups have surveyed selected areas, compared their field observations against the routes output to the maps, and documented specific examples of data irregularities which illustrate three key problems: mileage discrepancies, duplicate routes, and discrepancies among different data sources, i.e., routes in the PDF maps and the interactive online maps do not match (see: <https://goo.gl/Yz6C3m>

**West Mojave Route Network Project
DSEIS/LUPA****Comment period now open****Deadline: June 14, 2018**

The BLM has prepared a Draft Land Use Plan Amendment (LUPA) and Draft Supplemental Environmental Impact Statement (DSEIS) for the West Mojave Route Network Project (WMRNP) within the West Mojave (WEMO) Planning Area of the California Desert Conservation Area (CDCA). A 90-day comment period was opened on March 16th.

Federal Register doc 2018-05272<https://www.federalregister.gov/d/2018-05272>**Want to receive late breaking updates?**

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and <https://goo.gl/gjsrfA>.

These observations call into question the accuracy of other data **BLM** output to the maps and how redundant routes will be handled. For Rockhounds, there are also questions about what route data may have been omitted. (The maps do not have feature labels, so it is hard to discern.) Together, these issues create enormous barriers for individuals who are trying to submit effective comments.

Request for a comment period extension

In the light of the significant problems and unresolved questions encountered by many users, the **WEMO** team of **The Wilderness Society (TWS)** prepared a letter to the **BLM** on May 30, 2018 requesting an extension to September 12, 2018 for the comment period on the **WEMO Draft Land Use Plan Amenment and Supplemental Environmental Impact Study (LUPA/DSEIS)** (see: <https://goo.gl/LwqaWY>). The letter makes a clear, concise case for the public needing more time to comment. It does not plead a values oriented message centered on the goals of conservation stakeholders. It focuses on the bad data and usability of the maps **BLM** made available for comment, with all users impacted negatively and all users standing to benefit from an extension.

Sheara Cohen, California Desert Public Lands Representative for **TWS**, outlined the issues in an email to California BLM Director **Jerome Perez**:

"These errors are of a magnitude that it makes it impossible to understand what the BLM is proposing for some geographies and in terms of

total designated route mileage. In addition, there are significant gaps in the type of information the public has been provided. These issues make it extremely cumbersome to review the DSEIS and provide meaningful comments. The public has a right to accurate information so they can reasonably foresee the result of a proposed action. Unfortunately, this is not what we have received.

These issues add to the already challenging and time-consuming task of reviewing a plan of this scale and complexity. Many have spent a significant portion of the comment period simply trying to obtain information from the BLM, wading through highly inconsistent depictions of the alternatives, and verifying the accuracy of the data with the BLM and against other data sources. Even without the data problems, 90 days is already a tight timeline for evaluating a plan as voluminous and complex as WEMO.”

The letter prepared by **Ms. Cohen** was signed by 39 members of the public, organizations, and other stakeholders who have disparate interests, including conservationists, eight rockhounds, and one paleontological society. We appreciate the outreach that **TWS** extended to other stakeholders who are often on opposing sides of an issue. Here’s one issue everyone can all agree on – an extension on the comment period is needed, the data need fixing, and usability of the maps need to be more user-friendly.

Don’t wait for an extension, comment now – it may be the only opportunity
It is uncertain whether or not the letter will result in an extension to the comment period, so members of the public should still plan on providing comments before the June 14th deadline. Supplemental comments can always be made, if an extension is granted.

One of the most exasperating aspects of the current **WMRNP** maps is ascertaining what data are reflected in the alternative plans and recognizing what might have been left out that should be in the maps. **Matt Toedtli** confirmed to **Kim Erb** and me that comments submitted on non-**WEMO** projects such as the **Desert Renewable Energy Conservation Plan (DRECP)** were not incorporated into the **WEMO** database, even though they are related components –

WEMO’s geographic boundaries overlay federal lands managed by **BLM** under the **DRECP** guideline.

If Rockhounds have any doubts about whether or not comments they submitted previously on any project are reflected in the current **WMRNP**, they should re-submit their past comment letters by June 14th. Be sure to keep a copy of your comments for future reference/re-submittal. See the box below for the URLs where you can submit comments to the **BLM**.

Where to find BLM’s WMRNP maps.

Comment directly in BLM’s map online
at the short URL: <https://goo.gl/g7oYLF>

or download BLM’s geo-referenced PDF maps
at the short URL: <https://goo.gl/Pkm2X9>

What Rockhounds need to know about making comments on WMRNP.

Be sure to include a reason for every comment you submit. It is not enough to tell BLM what you want done – “connect these two route segments” – you have to tell them that you want to keep a route open to retain motorized access to a hobby collecting area. If the area has been published in a field guide, it can only help to include the page citation with your comment. Be sure to keep a copy of your comments. Is this laborious? You bet.

There are four maps – which one should Rockhounds comment on?

- Alternative 1 is the no-action plan.
- Alternative 2 is the conservation plan.
- Alternative 3 is the recreation plan.
- Alternative 4 is the Preferred plan, the plan most likely to be adopted.

The routes in Alternatives 1 and 4 are close in total miles, but they do not overlap precisely – 800 miles of routes are shown in one and not the other.

BLM will not apply comments across all Alternative Plans, so, the agency advises users who click and comment directly on a route link in any given Alternative Plan, for example, Alternative 3, to include a statement directing BLM to apply the same comment to another plan, for example, Alternative 4.

Map tutorial.

Passed along from Ruth Hidalgo, a tutorial on how to use BLM’s interactive map can be found online at:

jawbone.org/index.php/seekritmodules/471-offroader-s-guide-to-wemo-online-map
or short URL: <https://goo.gl/wVhsXA>

Visit the SDMG website for updates at:
<https://goo.gl/tSyHmh>