



United States Department of the Interior BUREAU OF LAND MANAGEMENT

California State Office
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JUN 12 2018



Dear Stakeholder:

Thank you for your email dated May 30, 2018, (attached) to the Bureau of Land Management (BLM) State Director regarding the West Mojave Route Network Project (WMRNP). You requested that the BLM extend the public comment period on the draft supplemental environmental impact statement (DSEIS) for an additional 90 days, until September 12, 2018 due to the “voluminous, complex and often confusing nature of the agency data, analysis and information.”

As stated in Chapter 1.3.3 of the WMRNP DSEIS, the original Notice of Availability of the West Mojave Project DSEIS was published in the Federal Register on March 6, 2015, with a 90 day comment period. BLM extended that comment period on September 25, 2015, for an additional 120-days so the public would be able to review the DSEIS in context with the Desert Renewable Energy Conservation Plan Land Use Plan Amendment to the California Desert Conservation Area Plan. Following each of those comment periods, the BLM reviewed the public comments and made changes in the route designation alternatives, analysis, and/or text, where appropriate. Responses to public comment are included in Appendix I of the 2018 WMRNP DSEIS, and are reflected in the range of alternatives.

In 2018, the BLM requested comments through the WMRNP website indicating comments could be submitted in any of three ways—through an online interactive map, by email, or by mail. BLM’s online interactive map (referred to here as the “comment map”) was published along with the DSEIS for public comment on March 16, 2018. As the BLM discussed with The Wilderness Society (TWS) on March 26, 2018, the mileage totals in the comment map initially published did not match the mileage totals of the tables in the 2018 DSEIS. The BLM subsequently determined that it had inadvertently loaded a map layer that was not the final map layer used to calculate the tables in the DSEIS. The BLM remedied this on March 27, 2018, when it loaded the final map layer for the comment map. Regardless of the discrepancy in mileage totals between the initial comment map and the DSEIS, the comment map has been available to the public since March 16, 2018 to facilitate public comment by enabling users to simply click on any route or (as updated) any route segment, to add a comment, and to submit the comment to the BLM. Submitted comments are linked by WEMO-IDs to the route or its segment to which each comment pertains.

On April 9, 2018, BLM provided TWS its then-current GIS data (geodatabase data with four line feature classes pertaining to the four different route alternatives) in response to TWS’s Freedom of Information Act (FOIA) request received by the BLM on March 13, 2018—three days before

the DSEIS was opened for public comment. This information, while available to the public in response to a FOIA request, is not the type of information that BLM routinely publishes for review during a public comment period. The BLM does not typically publish GIS data for review during the comment period because that data is continually being updated, and in the preparation of an environmental document, the data must “freeze” by a date certain in order to enable the BLM to finalize and publish an EIS in a timely manner based on a given set of data. Pursuant to BLM policy, updated GIS data will again freeze and ultimately be finalized for publication with the Final SEIS. Nonetheless, in response to FOIA the BLM provided this data to TWS, and on April 13, 2018, TWS provided the GIS data to the Center for Biological Diversity (CBD). The BLM understands that TWS and CBD subsequently interpreted the then-existing GIS data and concluded that BLM’s comment map indicates duplicate routes and route segments. Any duplication of routes that you believe is reflected in the GIS data received in response to TWS’s FOIA request as compared to BLM’s comment map does not prevent the submission of route comments. As noted above, comments are linked to WEMO-IDs through the online interactive comment map. The BLM’s interdisciplinary team will address each comment received during the public comment period.


Finally, the BLM provided Interactive Georeferenced PDF maps for more convenient use in the field. These maps are interactive in the sense that they are geospatially capable and layers can be toggled on/off. As noted on the ePlanning and WMRNP websites, these field maps are not intended to be used directly for submitting comments but were provided as an additional informational tool in response to requests made by the public. The BLM updated the field maps with the final map layer used for the DSEIS on May 21, 2018. The addition of the revised GIS data to the Georeferenced PDF field maps does not affect and has not affected the ability of the user to provide substantive comments to BLM using the comment map.

In sum, the DSEIS together with the comment map provide the public the information necessary to understand the route network proposed under each alternative and to enable the public the full opportunity to provide meaningful comment. As noted above, Appendix I of the DSEIS includes responses to public comments received by the BLM during the previous 90-day and additional 120-day comment periods, and those responses are reflected in the 2018 DSEIS range of alternatives.

The public comment period will not be extended and will close on June 14, 2018. We greatly appreciate your desire to provide the BLM with informed and meaningful public comment.

Thank you for your continued interest in your public lands.

Sincerely,



Jerome E. Perez
State Director

Enclosure

cc:

(Sent Via Electronic Mail)

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May 30, 2018

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Sent Via Email

Re: Request for Comment Period Extension on West Mojave Route Network Project Draft Supplemental Environmental Impact Statement

Dear Director Perez:

The undersigned individuals and organizations, on behalf of our millions of members and the public, respectfully request that the Bureau of Land Management (BLM) extend the public comment period on the draft supplemental environmental impact statement (DSEIS) for the West Mojave (WEMO) Route Network Project for an additional 90 days, until September 12, 2018.

The voluminous, complex, and often confusing nature of the agency data, analysis, and information that the public is being asked to review and comment on necessitates additional time. In addition, the maps, spatial data, and DSEIS include significant discrepancies that make it nearly impossible to discern what BLM intends to propose across alternatives. These errors not only undermine the public's ability to make meaningful comments, but also dramatically increase the time needed to even attempt to provide useful comments. Finally, BLM has not provided sufficient data for the public to understand the rationale behind the route designations in the alternatives, nor any information as to whether or how it considered and incorporated route-specific comments submitted by the public in response to the 2015 DSEIS.

The following provides further details about these issues.

Complexity of the Task

The DSEIS is nearly 1000 pages, excluding lengthy appendices, and identifies over 16,000 total miles of routes in BLM's baseline inventory, of which nearly 11,000 miles are being considered for designation across the various alternatives. These routes span over 3 million acres of public land, including important wildlife habitat and cultural landscapes, national conservation lands, recreation areas, national monuments, and rural-residential areas.

BLM has specifically requested submission of route-specific comments. In order to provide these comments, the public must reference route data depicted in either BLM's geo-referenced PDF maps or online, interactive mapping tool. Just learning how to navigate and utilize these tools requires significant time and effort, and the functionality of the tools and cumbersome data frustrate efficient and effective public engagement. For instance, the online mapping tool includes 300,000 individual route segments averaging 1/20 of a mile in length, each with their own unique WEMO Route ID number. To effectively evaluate and comment on a single route using the tool, a member of the public needs to click on dozens of route segments.

Data Discrepancies, Irregularities and Errors

Of even greater significance, data errors, inconsistencies, and irregularities make it impossible to understand what BLM is proposing in key areas and across alternatives. For instance, there are substantial discrepancies between the motorized route networks as depicted in the geo-referenced PDF maps and in the online, interactive mapping tool. Among the 165 different geo-referenced PDF maps, at least some show an entirely different motorized route network for the No Action Alternative and Alternative 2 (and possibly the others) than the network displayed in the online mapping tool and its GIS source files.

In addition, all four alternatives in the online mapping tool and its GIS source data contain thousands of overlapping route segments with entirely different WEMO IDs. Discounting these duplicate routes leads to map mileage totals that are hundreds of miles different from the mileage totals summarized for all alternatives in the DSEIS. Not only does this frustrate the public's ability to understand and comment on the alternatives BLM is proposing, but it also raises serious concerns about BLM's ability to ensure that public comments on particular routes or route segments will be applied to all overlapping route segments.

Failure to Provide Adequate Data

Finally, BLM has not provided all the information the public needs to effectively review and comment on specific routes. For instance, the route-specific evaluation forms that document how BLM addressed each individual route in the DSEIS alternatives and its rationale for doing so are not available. Without this information, the public lacks information on the route-specific analysis that formed the basis for the alternatives. In addition, BLM has failed to provide critical information about whether and how route-specific comments submitted by the public on the 2015 DSEIS were considered and incorporated into the 2018 DSEIS alternatives. Without this information, the public is forced to slowly comb through each route in each alternative using a combination of the geo-referenced PDF maps and online mapping tool to determine if or how their prior comments influenced the DSEIS alternatives and what route-specific comments need

to be resubmitted.¹ Finally, while the geo-referenced PDF maps display sub-designations such as motorcycle or street-legal vehicle only important for meaningful analysis of the alternative proposals, the online mapping tool does not.

We have spent much of the first two months of the public comment period identifying these barriers to efficient and meaningful public review of and comment on the DSEIS and associated data. We respectfully request an additional 90 days to provide sufficient time for the undersigned organizations, individuals, and other members of the public to attempt to provide meaningful route-specific comments and information. Consideration of that information will be necessary to ensure BLM can designate a route network that adequately protects sensitive desert resources, while providing for quality recreational experiences for all users.

Thank you for your consideration, and we look forward to your prompt response to this time-sensitive matter.

Sincerely,

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Los Angeles, CA

Bryan Baker
Conservation Chair, Sierra Club Mojave Group
Apple Valley, CA

Board of Directors (by a board vote)
Southern California Paleontological Society
Redondo Beach, CA

Tom Budlong
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Brenda Burnett
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¹ While BLM is instructing the public to resubmit their prior comments, many ordinary members of the public who are not associated with a professional organization have no records of the comments they made in 2015.

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