

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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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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