June 14, 2018

Bureau of Land Management
California Desert District
Matt Toedtli, Planning and Environmental Coordinator
Attn: WMRNP Plan Amendment
22835 Calle San Juan de Los Lagos
Moreno Valley, CA 92553
Email: blm_ca_wemo_project@blm.gov


Specifically, this letter address Travel Management Area 3 (TMA 3), Alternative 2, Route Subdesignation Alternative 2, Street Legal Only (Alternative 2.2 SLO).

Dear Matt Toedtli,

The Morongo Basin Conservation Association, its board and members, have been diligent in researching, educating community members, and responding to each iteration of the West Mojave Plan (WEMO) particularly TMA 3. TMA 3 stretches from the Wonder Valley subregion to the Juniper Flats subregion south of Apple Valley. Within TMA 3 there are five subregions: Juniper Flats, Rattlesnake Canyon, Sand to Snow National Monument, Joshua Tree, and Wonder Valley.

This time around it appears we have generally been heard. If TMA 3 Alternative 2.2 SLO is adopted many of the to the public and private land use conflicts with OHVs in the County unincorporated areas will be avoided. Alternative 2 emphasizes protection of physical, biological, and heritage resources, while providing for the smallest transportation and travel network focused on through access, and the most limited acreage and forage allocation dedicated to livestock grazing, comparatively.

Background

1. County OHV Ordinance, the rules of the road

Zoning of county unincorporated land is predominantly Rural Living (RL) outside of community centers such as Joshua Tree, Lucerne Valley, and the cities of Twentynine Palms, Yucca Valley, and Apple Valley. Rural residents are generally scattered on 5-acre small tracts and many are organized for services under County Service Areas (CSA) or County Service Districts (CSD).
In the unincorporated RL areas within the Morongo Basin - from Wonder Valley (Maps 9, 14, 15) to Pioneertown and Friendly Hills area (Maps 11, 12, 17) and the Morongo Valley (Map 16) - there are no OHV riding areas or trails except on public land. The sign below was developed and manufactured by the County Public Works Department for posting on both maintained and unmaintained county roads in the Morongo Basin area. The wording was approved by County Counsel. The wording can be changed to support no OHV riding in other unincorporated areas within the County as needed.

The County OHV Ordinance and Code Section 28.0403 apply to the unincorporated areas throughout San Bernardino County.

Therefore, WEMO routes cannot begin or end on county land unless there is a staging area to accommodate trucks or trailers for towing. Routes beginning on private property must have written permission from owner on person.

Lands of the subregion containing the Pinto, Lucerne Valley, and Eastern Slopes, span diverse landscapes of the south-central Mojave Desert and the San Bernardino Mountains, from 3,000 feet to over 5,000 feet in elevation. The subarea includes most of Joshua Tree National Park, the north and east facing slopes of the San Bernardino Mountains, and desert ranges of the southern Mojave Desert.

The subarea’s central portion includes the vast Twentynine Palms Marine Corps Air Ground Combat Center and the growing communities of the Morongo Basin and Lucerne Valley. These are essentially surrounded by public lands that are important to maintaining a variety of sensitive natural resources.

Existing BLM National Conservation Lands play an important conservation role in the subarea. They have already been designated by Congress for conservation purposes, and they are not subject to the alternatives under this plan. DRECP LUPA Appendix A, Pages A-39-40 - Bold added.

All BLM ACECs have nationally significant values for which important criteria have been enumerated with overarching goals and objectives. Each objective has management actions to insure protection. A BLM CDNCL designation overlays many of the ACECs providing additional protection. There are 12 ACECs within TMA3 and their boundaries often overlap the individual TMA 3 map boundaries making it difficult to determine through access and % disturbance. The ACECs are described in the DRECP, LUPA, not in WEMO. The Conservation and Management Actions (CMA) for each ACEC in the WEMO plan (Appendix
H) refers to the CMAs in the DRECP LUPA. However, the DRECP CMAs govern the disturbance of utility-scale solar construction and operation over miles square parcels on 0 to 5% slopes. The scale of the WEMO route network is totally different from the DRECP. The thousands of miles of WEMO routes cross terrain with all degrees of slope (mountains to desert), a variety of soils, many erosive, during all seasons, with OHVs raising dust, emitting loud noises, and moving fast along trails wildlife and quiet recreationists use during the off OHV hours.

Table 1 below lists the TMAs Maps, the presence of Residential areas, the ACECs (12), the CDNCL overlay, Wilderness Areas (5) National Monuments (2), the presence of the Desert Linkage and a note on the erosiveness of the soils. Descriptions of the ACECs and CDNCL will be found in the DRECP LUPA, Look for the CDNCL lands in Appendix A and the index to the ACECs in Appendix B.

A column noting the presence or absence of the California Desert Linkage is provided because connectivity between the desert basins and ranges is critical to the resilience of plant and animal species with climate change. **NOTE:** A Linkage Design for the Joshua Tree – Twentynine Palms Connection-2008 South Wildlands (JT-29P) is missing from planning documents and maps for both the DRECP and the WEMO. It is an integral part of the Linkage Project for the California Deserts (See Map 33, page 66 of the Linkage Project), which is referenced throughout WEMO planning documents and maps. A portion of the Map 33 is inserted following Table 1. Future planning must include the JT-29P Linkage Project.

### TABLE 1: Protected areas, Desert linkages, and Erosive soils in TMA 3.

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<th>Residential Yes-unincorporated No residential area</th>
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*BLM ACEC acres and CDNCL acres are for the entire ACEC. They are not specific to individual mapped areas.

**Erosive soils are displayed on the PDF maps. They vary from hillside slopes, sandy roads, and washes.

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**Figure 5: Cut from A Linkage Network for the California Deserts - SC Wildlands 2012**
3 Air Quality in the Mojave Desert Air Basin

The MDAQMD Report 2013 (Appendix D) is not correct regarding PM10 and PM2.5 criteria pollutants from mobile sources using dirt roads in the TMA 3 subregions.

**OHV Open Areas are indirectly inventoried as area sources, as an element of the unpaved road dust and the fugitive windblown dust subcategories. OHV Open Areas are not significant contributors to either subcategory due to scale –** The WEMO Planning Area includes thousands of miles of maintained and unmaintained unpaved roads and tracks, and tens of millions of acres of disturbed surface, and the contributions of the relatively small OHV Open Area is equally relatively small. Regional experience with windblown dust has shown that heavily traveled unpaved roads and similar frequently disturbed (on at least a daily basis) surfaces are the primary contributor to regional dust problems. **Confining OHV activity to existing defined OHV Open Areas has been an element of regional dust control planning for more than 20 years and is an element of Federal PM 10 planning. OHV Open Areas are not a significant contributor to regional dust (PM 10) emissions.** Appendix D, Pages 3-4 Underlining added to support analysis below.

**BUT**

- WEMO is not a plan for confining OHV activity to relatively small existing OHV Open Areas. WEMO is planning for millions of OHV and motorcycle riders on over 6,000 miles of dirt routes scattered throughout the Mojave Desert planning area.
- Appendix B – WEMO Planning Area Ambient Monitoring Sites (Dust) MDAGMD lacks EPA/CARB approved PM 10 monitoring equipment at any location east of Victorville, Barstow, and at the Lucerne Valley Middle School. The list of stations is deceptive: a) Joshua Tree National Monument (now National Park) has two approved monitors that were recently (2016) upgraded to measure PM 10. But, more importantly for WEMO, the Park monitors are focused on air quality in the Park. b) The monitor in Twentynine Palms – Adobe Road #2 - was removed many years ago. c) Mojave National Preserve has no monitors. d) Barstow and Hesperia monitors are in urban locations and the WEMO dust producing areas are down wind of these locations.

This Report on the dust potential in the WEMO area does not meet NEPA requirements to inform project stakeholders


*The analysis of routes is based on the Minimization Criteria.
Federal Regulations 43 CFR 8342.1 requires designation of public lands and routes as open, limited, or closed based on protection of resources of public lands, safety of all users, and minimization of conflicts among the various uses of the public lands, and in accordance with the following criteria, which will be used to reference routes in the individual map analyses:*

1. **Areas and trails shall be located to minimize damage to soil, watershed, vegetation, air, or other resources of the public lands, and to prevent impairment of wilderness suitability.**
2. **Areas and trails shall be located to minimize harassment of wildlife or significant disruption of wildlife habitats. Special attention will be given to protect endangered or threatened species and their habitats.**
3. **Areas and trails shall be located to minimize conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or neighboring public lands,**
and to ensure the compatibility of such uses with existing conditions in populated areas, taking into account noise and other factors.

4. Areas and trails shall not be located in officially designated wilderness areas or primitive areas. Areas and trails shall be located in natural areas only if the authorized officer determines that off-road vehicle use in such locations will not adversely affect natural, aesthetic, scenic, or other values for which areas are established.

5. Individual Map Analysis based on MC and ACEC Planning documents

Green Routes – Motorized - are interpreted to mean legal for OHV riding.

Green Routes within an area can qualify under more than one of these criteria.

A. Green Routes that begin/end without a staging area for trailering from paved or unpaved roads in unincorporated county areas should be signed, construct a staging area, or designated closed or SLO, depending on applicable ACEC Management Actions, based on MC #s 1, 2, 3 and Co. Code Section 28,0403

B. Green Routes within a protective area that begin/end at a TLD or SLO should be signed and designated as either TLS or SLO based on MC #s 1, 2, 3.

C. Any of the above Green Routes on Congressionally designated CDNCL land, especially when it is protective of ACECs, National Monuments, wildlife linkages, and adjacent Wilderness Areas should be signed and designated SLO or closed, depending on applicable ACEC Management Actions, and MC #1 through 4

D. Green Routes that begin/end or cross ACECs without through access should be signed and designated closed or SLO based on individual ACEC goals and management objectives and MC #s 1, 2

E. Green Routes through scattered residential areas in unincorporated county land that attract OHV touring with accompanying noise, dust, and speed should be signed and designated closed or SLO based on MC #s 1, 2, 3 and County Code Section 28.0403.

F. Green Routes that conflict with established hiking trails should be signed closed and restored based on MC #3.

NOTE: When maps are used for illustration the USGS Layer is turned off to better see the protective layers.

TMA3 Map 1 Victorville, Apple Valley - Alternative 2, Subdesignation 2.2 SLO

Brisbane Valley Monkey Flower ACEC overlaps with Stoddard Mountain Grazing Allotment and both are within the Wildlife Linkage.

Criteria: A, D (as listed in 5 above)

Management Actions include the protection of viable Monkey Flower populations and the maintenance of the wildlife linkage for desert tortoise to move.

Alternative 2.2 SLO shows Green Routes confined within the ACEC boundary.

Routes: SV6509 -154073, SV6511- 153743, SV6510
TMA 3 Map 2 Apple Valley So, Fifteen Mile Valley - Alternative 2, Subdesignation 2.2 SLO

Juniper Flats Cultural ACEC is surrounded on three sides by the much larger Granite Mountain Wildlife Linkage ACEC which provides critical links for wildlife populations from the San Bernardino Mountains north to Granite Mountain. The CDNCL is an overlay on the Juniper Flats Cultural ACEC, The Desert Wildlife Linkage covers much of the mapped area. There are four protective overlays and the Round Mountain Grazing Allotment. The area embracing the mountains is a nightmare of green routes that begin and end at a TLD or SLO with no through access encouraging OHVs riders to go from wherever to wherever they please.

Criteria A, B, C, D, E, F tag route problems found throughout TMA 3.

For years the Friends of Juniper Flats has worked with the Barstow Field Office staff to bring order to the jumble of unauthorized routes. MBCA endorses and references the comments submitted by the Friends of Juniper Flats as the most informed and practical for that area. We also salute their years of dedication and hard manual labor to support the areas ecological and cultural resources and recreational opportunities.

TMA 3 Map 3 Cougar Buttes, Lucerne Valley - Alternative 2, Subdesignation 2.2 SLO

The mapped area is bisected by County Scenic Highway 247 and the unincorporated community of Lucerne Valley. The community is within CSA29 with businesses, residences, small ranches and farms spread through the area.

The Granite Mountain Corridor ACEC comes in at three places on the west. The Old Woman Springs Linkage ACEC comes in from the east joining with the Carbonate Endemic Plants RNA ACEC. Johnson Valley OHV Area occupies the north east portion of the mapped area and the Desert Wildlife Linkage runs through all the ACECs and the CDNCL. CDNCL overlay both the Old Woman Springs ACEC and the Carbonate Plants RNA ACEC.

The routes for the following locations on the map generally fall under Criteria A, B, C and D
Old Woman Springs Wildlife Linkage ACEC

Carbonate Endemic Plants RNA ACEC
Routes: RC3202-RC3201-82077, RC3200-82073, RC3200-102840, RC3202, 83971, 102841, Rc3205 103743, 103750, RC3205, 8591, RC3203, 10873, RC4214, 9883, 103738,

There are 2 areas that are major dust releaser when disturbed. The hillside routes have no doubt been there for some time but with the 2 industrial solar fields now in operation the air quality has suffered. See Air Quality above. Routes: 108971, JF3127, JF3125, 108926, JF 130, JF131, JF3113, JF3110, 108950, JF3139, JF1339, JF3115, JF3117-108943

Lucerne Dry Lake and DRECP DFA

The routes in Lucerne Dry Lake area fall under Criteria A, B, and F.
In addition to bridging 2 arms of the Desert Wildlife Linkage they also criss-cross a DRECP DFA.
Routes: 149198 – 149200, 149205 – SV5937
149202 – SV5904, 149201 -149203, 149204.

Any driving on the dry lake will cause high levels of dust for both up and downwind residents – it is not a good place for a utility solar field either.

TMA 3 Map 4 Melville Lake, Old Woman Springs - Alternative 2, Subdesignation 2.2 SLO
This map is dominated by the Johnson Valley OHV Area with bordering County, State, and BLM land. There is a CDNCL overlay on the Old Woman Springs Wildlife Linkage ACEC.
Alternative 2.2 fixes many of the trespass problems found in the previous edition of WEMO.

The following Green Routes fall under Criteria A, B, C, and D.
The majority of the land area is covered by the Granite Mountain Corridor ACEC with a partial overlay of CDNCL, the Desert Linkage Network, and the Round Mountain Grazing Allotment. Residential areas are crossed by Green Routes and the entire area is prone to erosion and dust. All the Green Routes fall under Criteria A, B, C, D, E, F and should be signed and designed as either closed or SLO, depending on applicable ACEC Management Actions. The ACEC has a 0.25% Disturbance Cap. The Route numbers are not listed here because BLM has the file of route numbers for this area on hand.

TMA 3, Map 6 Big Bear City, Fawnskin - Alternative 2, Subdesignation 2.2 SLO

The east half of this mapped area has unincorporated residential areas adjacent to and within the Carbonate Endemics RNA ACEC. Both the Carbonate Endemics and Old Woman Springs ACEC are also protected under the CDNCL designation. The Desert Wildlife Linkage traverses the Old Woman Springs Wildlife Linkage ACEC. The Rattlesnake Canyon Grazing Allotment is within the east arm of the linkage. The Carbonate Endemics ACEC has a 1% Disturbance Cap and the Old Woman Springs has a 0.5% Disturbance Cap. All areas surrounding Johnson Valley are prone to erosion.

All Green Routes within the area shown on the left fall under Criteria A, B, D, E, F and should be signed and designed as either closed or SLO, depending on applicable ACEC Management Actions. There are no Green Routes in the Granite Mountain Corridor ACEC on the west side of this mapped area. All Green Routes are within the area above, which comprises the remainder of the mapped area. The Route numbers are not listed here because BLM has the file of route numbers for this area on hand.
TMA 3 Map 7 Bighorn Canyon, Rattlesnake Canyon - Alternative 2, Subdesignation 2.2 SLO

The unincorporated community of Johnson Valley is gateway to the Johnson Valley OHV Area and bordered on three sides by an array of overlapping protected lands including: Bighorn Mountain Wilderness Area, Old Woman Springs Wildlife Linkage ACEC, CDNCL lands, and the Desert Wildlife Linkage. There is also a large area for management of the Pipes Canyon Huge Joshua Tree. The Rattlesnake Canyon Grazing Allotment overlaps all of the above. Many of the problem OHV riding areas are fixed with Alternative 2.2 SLO and those that remain fall under **Criteria A, B, C, D, E** and should be signed and designed as either closed or SLO, depending on applicable ACEC Management Actions. The Route numbers are not listed here because **BLM has the file of route numbers for this area on hand**.

TMA 3 Map 8 Goat Mountain, Landers - Alternative 2, Subdesignation 2.2 SLO

The unincorporated communities of Homestead Valley (County Service Area (CSA) 70) are bordered on the west by the Old Woman Springs ACEC overlaid by CDNCL, the Desert Wildlife Linkage, and Sand to Snow National Monument. To the north is Johnson Valley OHV Area and on the east side is a branch of the Desert Wildlife Linkage, the 29 Palms Marine Base, and Giant Rock, a favored destination for OHV touring.

Under Alternative 2.2, most of the problem Green Routes are now SLO. However Green Routes leading to Giant Rock from county land require staging areas or should be signed closed under **Criteria A. Routes**: 31294, 4371

Green Routes leading into or beginning within Old Woman Springs ACEC can fall under **Criteria A, B, C, D, E, or F** depending on location. The ACEC has a 0.5% Disturbance Cap and we wonder how this small area affects the whole. There are short routes that enter and end seemingly without a touring purpose. **Route 2350**
This snip shows multiple entrances into the ACEC and National Monument beginning from community roads and Hwy 247. It is a quagmire of routes that would take hours to sort out as to which is what. The purpose of this comment is to point out this awkward, complex, and hazardous situation. In lieu of BLM staff planning, with community support, *for the smallest travel network focused on through access*, all routes entering the ACEC from Homestead Valley into the Old Woman Springs ACEC and San to Snow NM must be signed and closed as TLD. If signed for SLO then staging must be available as per Co. Code Section 28.0403.

**TMA 3, Map 9 Lead Mountain SW, Deadman Lake SE - Alternative 2, Subdesignation 2.2 SLO**

This area, with typical checkerboard land ownership, is adjacent to the 29 Palms Marine Base. As seen in this clip, Alternative 2.2 and SLO is in compliance with Co. Code Section 28.0403 and eliminates conflicts.

**TMA 3, Map 10 Bristol Lake SW, Cleghorn Lakes - Alternative 2, Subdesignation 2.2 SLO**

This area traces the boundary of the Cleghorn Lakes Wilderness Area. If Alternative 2.2 is designated there are no routes conflicting with Criteria A through F.

**TMA 3, Map 11 Rimrock, Onyx Peak - Alternative 2, Subdesignation 2.2 SLO**

This is a complex area in the foothills of the San Bernardino Mountains as they grade into the high desert. Pioneertown, Rimrock, Bruns Canyon and Gamma Gulch are well known community areas with scattered housing and ranches. Protective designations include Old Woman Springs ACEC, Pipes Canyon ACEC, and a piece of Big Morongo Canyon ACEC and areas of CDNCL. There are two wilderness areas: Bighorn Mountain and San Gorgonio Wilderness Areas. A large portion of the public and private lands are part of the Desert Linkage Network.
Green Routes on this map demonstrate the usual problem of access and connectivity for travel between public and private land. The scenarios are found in Criteria A, B, C, D.

Green Routes in the area on the left.
RC2207, 126515, 126516, RC2201, 109205, RC2217, RC3331, 160660,
RC2207, 126515, 126516, RC2201, 109205, RC2217, RC3331, 160660,
RC2207, 126515, 126516, RC2201, 109205, RC2217, RC3331, 160660,
RC2207, 126515, 126516, RC2201, 109205, RC2217, RC3331, 160660,

In the Checkerboard area to the south the following routes had access or connectivity problems.
109191, RC2211, RC3331-10914-RC3331, RC2431, 127075, RC2429, RC2403, RC2403, RC2410, 127108-
RC2419-109095, RC2413, RC2447, RC2417, RC2419, RC2419-109095, RC1437, RC1432, RC1421-108235,
126978, RC1440.

I reference the comment letter from Sarah Kennington and Steve Bardwell, residents of Gamma Gulch for a more detailed look at the routes in their area along with history from their neighbors.

TMA 3 Map 12 Joshua Tree North - Alternative 2, Subdesignation 2.2 SLO
The area on this map is adjacent to populated areas of North Joshua Tree. The area with the Green Route problems is within the Sand to Snow National Monument and the Old Woman Springs ACEC, both of which are part of the CDNCL system. The Desert Linkage Network mostly covers Sand to Snow NM.

Access to the Monument is from Flamingo Heights. Green Routes on this map demonstrate the usual problem of access and connectivity for travel between public and private land. The scenarios are found in Criteria A, B, C, D.

Routes: RC1428-1008227, 126952, RC1429, RC1419, 108233-RC1418, 126979, 108232, 126970, 126971,
RC1437, RC1432-108234, 126978, 108238, RC1432-108234, 126978, 1008238, RC1412-109078, 126990,
127005, RC1412, 126992.
Under Alternative 2.2 I found no other route problems.
I again reference the comment letter from Sarah Kennington and Steve Bardwell for a more informed and nuanced knowledge of route problems in this area.

**TMA 3 Map 13, Twentynine Palms, Sunfair - Alternative 2, Subdesignation 2.2 SLO**
Alternative 2.2 does an excellent job of eliminating conflicts in the many small tract communities in this area. This writer lives in Desert Heights, to the east of Copper Mountain, so I speak from experience. There are no protective overlays in this area but, as mentioned on page 4 of this letter, *A Linkage Design for the Joshua Tree – 29 Palms Connection* is missing from the WEMO resource library. I attach here a map submitted for the previous WEMO draft which shows the linkage and the communities. The Green Routes scattered throughout the area are eliminated under Alternative 2.2. The few remaining problems are on Copper Mountain, which I will discuss below.

The importance of the linkage design cannot be overstated as it protects the populations of plants and animals that live in and move between the Joshua Tree National Park and the 29 Palms Marine Base. The missions of both the Park and Base require that they not become islands of biodiversity. The Base is one of the steady funders for the purchase of inholdings within the linkage to insure connectivity. Among the protected species that live on Copper Mountain are the Desert Tortoise and Burrowing Owl. Both are casualties for clueless OHV riders.
Most of the routes in the southern, highest elevation of Copper Mountain are designated TLS under Alternative 2.2. The few Green Routes that remain have the same problems of access to and from county land and lack continuity over the length of the route. The Green Routes with problems fall under Criteria B, E.


**TMA 3 Map 14 East of Valley Mountain, Valley Mountain - Alternative 2, Subdesignation 2.2 SLO**

This area is the Community of Wonder Valley CSA 70-M. My comments reference those submitted by its many residents and Community Off Road Vehicle Watch (COW). My contribution here is to include the map developed and submitted for the previous WEMO draft that shows the Joshua Tree to 29 Palms Linkage Design.
**Route:** WV 1948-78822 paralleling the Gas Pipeline is illegally accessed east of Shadow Mtn. Rd. This route should be designated SLO, TLD, or a staging area provided. **Criteria A**

**TMA 3 Map 15 East of Dale Lake - Alternative 2, Subdesignation 2.2 SLO**

Route 1948 - 78822 is discontinuous with SLO through Sheephole Pass paralleling Cleghorn Lakes Wilderness Area boundary.

**TMA 3 Map 16 Morongo Valley - Alternative 2, Subdesignation 2.2 SLO**

**Routes:** RC1135, 27974-79360 **Criteria A and F.** These Green Routes into the San Gorgonio Wilderness are accessed from county land illegally and should be closed or designated TLD. There is a considerable amount of OHV traffic through the neighborhoods that results in calls to County Code Enforcements and the BLM Palm Springs Office.

**TMA 3 Map 17 Joshua Tree South, Yucca Valley South - Alternative 2, Subdesignation 2.2 SLO**

Map released January 2018

Map released May 2018

Map 17 with the January 2018 release date showed the route through Section 5 as green. Map 17 with the May 2018 release date shows that route is now TLD. Hooray! The neighborhood will be thrilled. You received lots of letters that are based on the January 2018 map.
Similar to Map 17 above, the two versions of map 18 show a very different route designation. The Route 13518 is the road into 49 Palms Canyon in Joshua Tree National Park. It apparently is on BLM land and is now open to OHVs. I choose to believe this change in the May map is an unintended error and will be corrected.

6. Mojave Trails National Monument

The proclamation for Mojave Trails National Monument provided very clear direction that a separate Travel Management Plan needs to be created to replace the existing Travel Management Plan. The proclamation also has very specific guidance on management of existing roads and trails, and the prohibition on roads and trails that didn't exist at the time of the proclamation. Travel management planning is done as part of the larger effort of resource management planning, which should be completed with the greatest amount of input from local community members and businesses. The local communities of Twentynine Palms, Barstow, and Needles have all resolved to become "Gateways" to Mojave Trails National Monument or the portions of Route 66 therein and are enthusiastic about engaging to help determine the future of recreational use in the area.

For these reasons, Mojave Trails National Monument should not be included in the current WEMO plan, but instead travel management planning for the National Monument should proceed along a separate track.
7. Comment Letters MBCA endorses the following letters

1. Mojave Trails - authored by The Wilderness Society and Defenders of Wildlife, Conservation Lands Foundation - WEMO conformance to National Monument proclamation
2. Letter by Sarah Kennington and Steve Bardwell related to Pipes Canyon area
3. Letter by California Wilderness Coalition on Middle Knob National Conservation Lands
4. Letter by Community Off Road Vehicle Watch and community members in the Wonder Valley Area

A series of criteria was developed for these comments to facilitate the decision making based on the management objectives of the ACECs and the San Bernardino County OHV Ordinance and Code Section 48.0403. The checkerboard land ownership so predominant in TMA 3 is served by Alternative 2, Subdesignation 2 Street Legal Only and we urge its adoption for this area. There are still problems to be dealt with but far fewer under Alternative 2 than 4.

Please feel free to contact me with any questions you may have about these comments.
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Sincerely,

Pat Flanagan
Board Member, MBCA

For all the Board
Sarah Kennington
Steve Bardwell
David Fick
Laraine Turk
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Marina West
Claudia Sall
Ruth Rieman
Seth Shteir
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Supervisor James Ramos
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Frazier Haney, Conservation Lands Foundation
Sheara Cohen, The Wilderness Society