

APPENDIX I
RESPONSES TO COMMENTS ON DRAFT SEIS

**APPENDIX I
 RESPONSES TO COMMENTS
 ON DRAFT SUPPLEMENTAL EIS**

Table I-1: Responses to Comments on NEPA Process

Subsection 1.1 Public Participation

Comment 1.1-1: Request extension of Draft Supplemental EIS comment period	
	<p><i>Summary of Comments:</i> These comments request that the Draft Supplemental EIS comment period be extended. The comments provide a variety of reasons, including stating that none of the alternatives are acceptable since they do not fulfill the Court’s mandate to minimize adverse impacts and conflicts, that the size and complexity of the document require additional review time, and that additional review time will allow commenters to bring forth additional information to help inform BLM’s decision.</p>
	<p><i>Response to Comments:</i> The Draft Supplemental EIS comment period was re-opened in September 2015 for an additional 120 days. In addition, the Draft SEIS has been developed, and will be distributed for another round of public review.</p>
Comment 1.1-2: Failure to follow requirements for public hearings, notices, and availability of materials for public review and comment	
	<p><i>Summary of Comments:</i> These comments generally state that BLM did not follow requirements for public hearings, notices, and opportunities for public review and comment. Some comments simply make a general statement, without identifying specific deficiencies. Others identify specific items, such as stating that BLM failed to provide access to hard-copies of the Draft Supplemental EIS and maps, that BLM failed to answer questions at the public meetings, or that BLM failed to provide the names of the preparers of the Draft Supplemental EIS.</p>
	<p><i>Response to Comments:</i> The agency followed all requirements of the BLM NEPA Handbook (H-1790-1) and Land Use Planning Handbook (H-1601-1) with respect to providing opportunities for public input into the WMRNP. The efforts associated with pre-planning and scoping are described in Section 5.4 of the Draft Supplemental EIS. The scoping process included publication of two Notices of Intent, two overview scoping meetings, eight public travel designation workshops, and three public workshops focused on tribal communities. Throughout this process, the agency encouraged members of the public to sign up for receipt of additional notices and copies of the Draft Supplemental EIS. Upon publication, the Draft Supplemental EIS, on DVD, was distributed to approximately 200 people and agencies on the mailing list, and another 600 people who requested copies directly from BLM staff or during public meetings. In addition to being published in the Federal Register, on the project website, and in local publications, notice of the availability of the Draft Supplemental EIS and public meetings was mailed to more than 1,200 persons who had requested notification. The agency then held four public review meetings at locations throughout the planning area. The public review period was re-opened in September 2015 and 2 additional open houses were held in December. In addition, the Draft SEIS has been developed, and will be distributed for another round of public review.</p>

Table I-1: Responses to Comments on NEPA Process

Comment 1.1-3: Difficulty accessing or using the Draft Supplemental EIS, or the maps, on BLM website	
	<p>Summary of Comments: These comments generally describe difficulties with accessing the Draft Supplemental EIS on BLM’s website, or with using the maps provided with the Draft Supplemental EIS, either on the BLM website or on the DVDs. The comments request extension of the public comment period to allow further review of the maps. The comments do not identify specific text in the Draft Supplemental EIS that is deficient.</p>
	<p>Response to Comments: It is acknowledged that the volume of data provided on the maps is enormous, due to the very large size of the planning area and large number of routes. Due to this large size, there was no feasible method for making the material publicly available in a small, easily downloadable file sizes. Knowing the large size of the files, the agency made the information available in two different forms – through the project website and on DVD. The agency immediately responded when reviewers expressed that they had difficulty accessing the files, by offering technical support and supplying approximately 600 DVDs upon request. In trying to make it possible for the public to review every one of the hundreds of thousands of routes with respect to dozens of different resources, the agency considered several different methods for portraying the information on maps. The use of interactive maps, where a reviewer can focus in on their area of interest and individually review each of the affected resources, is a common tool for graphically presenting these types of data for review. In doing so, the agency understood that all users may not be familiar with the technology. To address this, information describing how to use the system was included in a file on the DVD, called “Tips and Tricks for the Interactive Route Maps”. The agency also responded to dozens of requests from users who requested assistance, and provided staff at four public meetings to demonstrate the use of the maps. The agency received numerous comments, both in public comments on the Draft Supplemental EIS and in person at the meetings, praising the usefulness of the maps.</p>
Comment 1.1-4: Failure to include maps in Draft Supplemental EIS file or to provide all background files for maps	
	<p>Summary of Comments: These comments request that the GIS layers and inventory data be made available to the public, or state that the inclusion of the maps in a file separate from the Draft Supplemental EIS leaves the Draft Supplemental EIS incomplete.</p>
	<p>Response to Comments: Information from the GIS layers is available (shown) on the maps provided in the DEIS. The GIS data used for the Draft Supplemental EIS will be posted when the ROD is signed.</p>
Comment 1.1-5: Support for/appreciation of map features	
	<p>Summary of Comments: These comments generally provide positive comments on, and appreciation for, the functionality or content of the maps.</p>
	<p>Response to Comments: The comments in favor of the use of interactive maps to present the routes and the potentially affected resources are noted. No changes to the Draft SEIS have been requested, and none have been made.</p>

Table I-1: Responses to Comments on NEPA Process

Comment 1.1-6: Readability of the Draft Supplemental EIS	
	<p>Summary of Comments: These comments state that the Draft Supplemental EIS is not written in a plain, easily understandable manner, as is required by NEPA. Some comments provide analysis of the text of the Draft Supplemental EIS to measure its readability. The analysis demonstrates that the text of the Draft Supplemental EIS is confusing, and largely too complicated to meet the 40 CFR 1502 requirements for writing of a Draft Supplemental EIS in plain and concise language. The comments provide examples of how comparative information could be re-organized to improve the readability of the document.</p>
	<p>Response to Comments: The Draft SEIS has been amended from the previous Draft Supplemental EIS to enhance readability. It is hoped that it is clearer and more understandable for the commenter.</p>
Comment 1.1-7: General support for the approach of the WMRNP and route evaluation process	
	<p>Summary of Comments: These comments generally state that the WMRNP is an improvement on previous WEMO travel management efforts, and is likely to provide for improved preservation of resources. The comments encourage continued use of the process through the Travel Management Plans.</p>
	<p>Response to Comments: The comments in favor of the approach of the Draft Supplemental EIS and the route evaluation process are noted. No changes to the Draft SEIS have been requested, and none have been made.</p>
Comment 1.1-8: General objection to the approach of the Draft Supplemental EIS	
	<p>Summary of Comments: These comments generally oppose the approach used, or the range of alternatives evaluated. They recommend that none of the alternatives be adopted, and that the WMRNP be re-started, or another Draft Supplemental EIS issued for public comment before the Final Supplemental EIS is issued. The comments are made both by commenters who advocate reducing routes and protecting more resources, and commenters who would prefer to open more routes.</p>
	<p>Response to Comments: BLM followed all requirements of the BLM NEPA Handbook (H-1790-1) in acquiring public input into the scope of analyses and range of alternatives that were employed in the Draft Supplemental EIS.</p>

Subsection 1.2 Consultation

Comment 1.2-1: Requests that BLM consult with affected agencies, organizations, and communities	
	<p>Summary of Comments: These comments generally request that BLM consult with other law enforcement agencies, agencies that manage adjacent jurisdictions, outside organizations, or communities regarding the impact of the WMRNP on their enforcement capability, route network, stakeholders, or residents. Some of the comments state that BLM has not consulted, while others simply request future consultation. Some of the comments provide names of specific agencies or organizations that should be invited to consult, while other comments do not identify specific agencies or organizations.</p>
	<p>Response to Comments: Most of the agencies or organizations mentioned in these comments have already been included in consultations regarding the WMRNP up to this point of the project. In response to the comments, the agency has reviewed the requests to ensure that all of the requested parties are included on the mailings lists, for future communications.</p>

Table I-1: Responses to Comments on NEPA Process

Comment 1.2-2: Request to be kept informed of activities or participate in decisions on specific routes	
	<p><i>Summary of Comments:</i> These comments request that BLM keep the commenter, or others mentioned by the commenter, informed of activities, or allow the commenter to participate in decisions associated with specific routes or areas.</p>
	<p><i>Response to Comments:</i> Most of the agencies or organizations mentioned in these comments have already been included in consultations regarding the WMRNP up to this point of the project. In response to the comments, the agency has reviewed the requests to ensure that all of the requested parties are consulted on future decisions related to specific routes.</p>
Comment 1.2-3: Request to be included in consultation efforts	
	<p><i>Summary of Comments:</i> These comments request that BLM include the commenter, or others mentioned by the commenter, as a consulting party in future consultation efforts associated with the Programmatic Agreement with the SHPO and ACHP, or informal government-to-government consultation.</p>
	<p><i>Response to Comments:</i> If the BLM determines that local government involvement should be more explicit than is currently contemplated in the PA, then the agency will consult with tribes in the planning area and incorporate tribal participation.</p>
Comment 1.2-4: Draft Supplemental EIS should incorporate partnerships	
	<p><i>Summary of Comments:</i> These comments state that the Draft Supplemental EIS should incorporate partnerships with stakeholders. Some of the comments recommend specific groups that desire to be involved in partnerships and other recommend the BLM apply for funding from specific organizations.</p>
	<p><i>Response to Comments:</i> Partnerships are an important component of management of the WEMO Planning Area and are discussed in Appendix G and Section 3.11 on page 3.11-14. Additional information on partnerships can be found in the TMPs in Section 5.5.5 Partnerships.</p>
Comment 1.2-5: Incorporation of the Cultural Resource Programmatic Agreement	
	<p><i>Summary of Comments:</i> These comments state that the public should have been permitted to review and comment on the Section 106 Programmatic Agreement.</p>
	<p><i>Response to Comments:</i> BLM has followed all legal requirements for public participation under NHPA and NEPA.</p>

Subsection 1.3 Future Use of Supplemental EIS

Comment 1.3-1: Request that the WMRNP process be used to establish a mechanism for designation of future routes	
	<p><i>Summary of Comments:</i> These comments request that BLM use the WMRNP process to establish a mechanism that can be used to designate routes in the future without the need for CDCA Plan Amendment.</p>
	<p><i>Response to Comments:</i> Chapter 2 of the Draft Supplemental EIS discusses how the proposed Plan Amendments are intended to assist BLM in identifying future changes to the route network that would require an additional Plan Amendment, and which could be made without a new Plan Amendment.</p>

Table I-1: Responses to Comments on NEPA Process

Comment 1.3-2: Process for making decisions from the Supplemental EIS	
	<p>Summary of Comments: These comments request that the Draft Supplemental EIS provide a more specific description of how the various decisions resulting from the Supplemental EIS will be adopted.</p>
	<p>Response to Comments: Section 1.2 of the Draft Supplemental EIS discusses how the Record of Decision will identify all decisions adopted by BLM as part of the WMRNP.</p>
Subsection 1.4 NEPA Sufficiency	
Comment 1.4-1: Sufficiency of Purpose and Need Statement	
	<p>Summary of Comments: These comments provide a variety of both general and specific recommendations for modification of the Purpose and Need Statement in the Draft Supplemental EIS.</p>
	<p>Response to Comments: The Purpose and Need Statement was developed based on the specifications of the Court Order, which directed that the Supplemental EIS be developed, along with public input collected during the public scoping process. Public comments on the Purpose and Need Statement in the Draft Supplemental EIS were considered by BLM in development of the Draft SEIS.</p>
Comment 1.4-2: CEQA analysis required	
	<p>Summary of Comments: These comments state that, because the project is located in California, the WMRNP and/or associated implementation actions must be evaluated under CEQA, as well as NEPA.</p>
	<p>Response to Comments: The proposed action and alternatives are federal actions only, and do not involve any actions by State or local agencies. Therefore, CEQA is not applicable to the WMRNP.</p>
Comment 1.4-3: The WMRNP should be coordinated with DRECP	
	<p>Summary of Comments: These comments request better coordination between WMRNP and DRECP. Some comments state that WMRNP does not incorporate the changes that are proposed under DRECP. Others point out that the WMRNP makes statements about adopting the DRECP plan implementation strategy, even though that strategy has not been adopted yet. Other comments requested that the Final Supplemental EIS clearly indicate where changes were made in order to be consistent with DRECP. Some comments request that the WMRNP SEIS discuss how the DRECP disturbance caps were considered. Many commenters included their DRECP comments as an attachment to the WMRNP comments.</p>
	<p>Response to Comments: In 2016, BLM made the decision to delay completion of the WMRNP until DRECP had been completed, and to re-issue the WMRNP as a Draft SEIS, to allow it to incorporate data and decisions associated with DRECP.</p>
Comment 1.4-4: The WMRNP should not be coordinated with DRECP	
	<p>Summary of Comments: The comments object to the creation of a nexus between DRECP and the WMRNP, or to closing routes because of land use restrictions implemented as part of DRECP.</p>
	<p>Response to Comments: The comment is noted. However, in 2016, BLM made the decision to delay completion of the WMRNP until DRECP had been completed, and to re-issue the WMRNP as a Draft SEIS, to allow it to incorporate data and decisions associated with DRECP.</p>

Table I-1: Responses to Comments on NEPA Process

Comment 1.4-5: Consideration of other future regulatory requirements	
	<p><i>Summary of Comments:</i> These comments state that the route network will need to be updated for newly enacted wildlife protections by the CDFW, as well as future protections.</p>
	<p><i>Response to Comments:</i> As the WMRNP process has moved forward, BLM has continued to identify and update the route network and SEIS based on applicable regulatory protections.</p>
Comment 1.4-6: Supplemental Draft EIS is required based on the addition of any new alternative	
	<p><i>Summary of Comments:</i> These comments state that BLM must prepare and circulate another Supplemental Draft EIS, if another alternative is evaluated, if that alternative significantly differs from the original alternatives.</p>
	<p><i>Response to Comments:</i> In 2016, BLM made the decision to delay completion of the WMRNP until DRECP had been completed, and to re-issue the WMRNP as a Draft SEIS, to allow it to incorporate data and decisions associated with DRECP.</p>

Table I-2: Responses to Comments on Proposed CDCA Plan Amendments

Subsection 2.1 Comments in Favor of Proposed Plan Amendments

Comment 2.1-1: Comments in favor of part or all of PA VII – Update parameters for C Routes	
	<i>Summary of Comments:</i> These comments express support for adopting parts or all of PA VII, which would update the parameters for Competitive (C) Routes.
	<i>Response to Comments:</i> Comments in favor of the Plan Amendments generally did not provide additional information regarding the analysis; therefore, no changes were made to the Draft SEIS. The comments will be considered by BLM in the Record of Decision.
Comment 2.1-2: Comments in favor of PA IX – Changing WEMO Plan limitations on access into Rand Mountains - Fremont Valley Management Area	
	<i>Summary of Comments:</i> These comments favor adoption of PA IX, which would change the WEMO Plan limitations on access to the Rand Mountains - Fremont Valley Management Area.
	<i>Response to Comments:</i> Comments in favor of the Plan Amendments generally did not provide additional information regarding the analysis; therefore, no changes were made to the Draft SEIS. The comments will be considered by BLM in the Record of Decision.
Comment 2.1-3: Comments in favor of PA XI – Reallocate AUMs and modify allotment boundaries	
	<i>Summary of Comments:</i> These comments favor the adoption of PA XI – Reallocate AUMs and modify allotment boundaries, in order to protect resources.
	<i>Response to Comments:</i> Comments in favor of the Plan Amendments generally did not provide additional information regarding the analysis; therefore, no changes were made to the Draft SEIS. The comments will be considered by BLM in the Record of Decision.

Subsection 2.2 Comments Opposed to Proposed Plan Amendments

Comment 2.2-1: Comments opposed to the adoption of PA I – Change the CDCA Plan language that limits the WEMO route network to existing routes of travel as of 1980	
	<i>Summary of Comments:</i> These comments object to the adoption of proposed PA I – Change the CDCA Plan language that limits the WEMO route network to existing routes of travel as of 1980.
	<i>Response to Comments:</i> Comments opposed to the Plan Amendments generally did not provide additional information regarding the analysis; therefore, no changes were made to the Draft SEIS. The comments will be considered by BLM in the Record of Decision.
Comment 2.2-2: Comments opposed to the adoption of PA II – Update the CDCA Plan to incorporate the TTM process	
	<i>Summary of Comments:</i> These comments opposed the adoption of PA II – Update the CDCA Plan to incorporate the TTM process. The comments oppose the elimination of Multiple Use Classes as a mechanism for governing appropriate land use actions.
	<i>Response to Comments:</i> As a result of elimination of MUCs in DRECP, PA-II was eliminated in the Draft SEIS.

Comment 2.2-3: Comments opposed to all or part of PA VII – Update parameters for C Routes	
	<p><i>Summary of Comments:</i> These comments oppose adoption of some components of, or alternatives for, PA VII, which would update the parameters for Competitive (C) Routes.</p>
	<p><i>Response to Comments:</i> Comments opposed to the Plan Amendments generally did not provide additional information regarding the analysis; therefore, no changes were made to the Draft SEIS. The comments will be considered by BLM in the Record of Decision.</p>
Comment 2.2-4: Comments opposed to all or part of PA VIII – Modify general access designations related to washes, sand dunes, and dry lakes	
	<p><i>Summary of Comments:</i> These comments oppose adoption of some components of, or alternatives for, PA VIII, which would modify general access designations related to washes, sand dunes, and dry lakes.</p>
	<p><i>Response to Comments:</i> Comments opposed to the Plan Amendments generally did not provide additional information regarding the analysis; therefore, no changes were made to the Draft SEIS. The comments will be considered by BLM in the Record of Decision.</p>
Comment 2.2-5: Comments opposed to PA IX – Changing WEMO Plan limitations on access into Rand Mountains - Fremont Valley Management Area	
	<p><i>Summary of Comments:</i> These comments oppose adoption of PA IX, which would change the WEMO Plan limitations on access to the Rand Mountains - Fremont Valley Management Area.</p>
	<p><i>Response to Comments:</i> Comments opposed to the Plan Amendments generally did not provide additional information regarding the analysis; therefore, no changes were made to the Draft SEIS. The comments will be considered by BLM in the Record of Decision.</p>
Comment 2.2-6: Comments opposed to PA X – Changing WEMO Plan limits on stopping and parking adjacent to designated routes	
	<p><i>Summary of Comments:</i> These comments oppose adoption of PA X, which would change the WEMO Plan limitations on stopping and parking adjacent to designated routes. Some of these comments state a preference for wider limits, or no limits, in order to increase access. Other comments state a preference for narrower limits, in order to protect resources.</p>
	<p><i>Response to Comments:</i> Comments opposed to the Plan Amendments generally did not provide additional information regarding the analysis; therefore, no changes were made to the Draft SEIS. The comments will be considered by BLM in the Record of Decision.</p>
Comment 2.2-7: Comments opposed to PA XI – Reallocate AUMs and modify allotment boundaries	
	<p><i>Summary of Comments:</i> These comments oppose the adoption of PA XI – Reallocate AUMs and modify allotment boundaries. These comments oppose the inclusion of changes to grazing allotments in the alternatives evaluated in the Draft Supplemental EIS. The comments also state that the Draft Supplemental EIS does not analyze the impacts that would occur as a result of the termination of grazing.</p>
	<p><i>Response to Comments:</i> Comments opposed to the Plan Amendments generally did not provide additional information regarding the analysis; therefore, no changes were made to the Draft SEIS. The comments will be considered by BLM in the Record of Decision.</p>

Subsection 2.3 Comments Regarding Development and Analysis of the Proposed Plan Amendments

Comment 2.3-1: Compliance of Plan Amendments with FLPMA and the CDCA Plan	
	<p>Summary of Comments: These comments request that the Draft Supplemental EIS provide more information on the manner in which the proposed Plan Amendments are consistent with FLPMA and the CDCA Plan. These comments reference specific text from FLPMA and the CDCA Plan which describes the issues that the BLM must consider in LMP revisions. The commenters have highlighted specific passages in the text that they contend was not adequately considered in the Draft Supplemental EIS. The comments contend that the Draft Supplemental EIS addresses only limited elements of the CDCA Plan, and must address all elements.</p>
	<p>Response to Comments: Sections 2.1.2 and 2.2.1 of the Draft Supplemental EIS specifically reference sections of FLPMA, the CDCA Plan, BLM’s Travel and Transportation Management Handbook, and other BLM regulations and guidance that must be addressed under the WMRNP. The Draft Supplemental EIS addresses all CDCA Plan elements that would be affected by the proposed Plan Amendments. In addition, the Draft Supplemental EIS addresses all of the resources that are the subject of the CDCA Plan elements.</p>
Comment 2.3-2: Failure to provide full text of the proposed Plan Amendments	
	<p>Summary of Comments: These comments state that the general description of the proposed Plan Amendments is insufficient to allow public review of the proposal, and that the full text must be provided and analyzed.</p>
	<p>Response to Comments: The Draft Supplemental EIS provides a description of each proposed Plan Amendment and the objectives each Plan Amendment needs to meet, and describes the reason each Plan Amendment is needed, based on the requirements of the Court Order, BLM regulations, and BLM guidance. The specific language of each PA could not be developed until BLM obtained public input through review of the Draft SEIS. The specific language will be available for public review following publication of the Draft SEIS.</p>
Comment 2.3-3: Failure to analyze alternatives to all of the proposed Plan Amendments	
	<p>Summary of Comments: These comments state that the Draft Supplemental EIS must analyze alternatives to all of the proposed Plan Amendments, and point out that there are no alternatives to PA-I, PA-II, and PA-IV.</p>
	<p>Response to Comments: Section 2.1.2 of the Draft Supplemental EIS specifically describes why alternatives are not considered for some of the proposed Plan Amendments. The rationale, in each case, is that the existing language of the CDCA Plan no longer applies because it has been overridden by other legislation, regulation, or guidance. In effect, these items have already been changed by that legislation, regulation, or guidance, and thus the proposed amendments are simply incorporating those changes.</p>
Comment 2.3-4: Alternatives to the proposed Plan Amendments are inadequate	
	<p>Summary of Comments: These comments state that the alternatives evaluated for some of the Plan Amendments are inadequate, do not comply with the goals and direction of the CDCA Plan, do not present a range of alternatives, and do not incorporate the minimization criteria or Executive Orders 11,644 or 11,989.</p>

	<p>Response to Comments: Section 2.1.2 of the Draft Supplemental EIS specifically describes the alternatives developed for the Plan Amendments that can be varied. Those alternatives were developed using input from the public scoping process. These comments were considered by BLM, in determining whether additional alternatives merited consideration in the Draft SEIS.</p>
<p>Comment 2.3-5: Comments on the sufficiency of analysis of the proposed Plan Amendments</p>	
	<p>Summary of Comments: These comments state that the analysis of the proposed Plan Amendments is insufficient. Some comments state that the analysis does not apply or address the minimization criteria. Other comments request an analysis of the impact of the proposed Plan Amendments by evaluating the condition and trend of ACECs and NLCS lands.</p>
	<p>Response to Comments: The resources analyzed within Chapters 3 and 4 include all of the resources from the minimization criteria of 43 CFR 8342.1. The analysis of each of those resources, including ACECs and NLCS lands, specifically addresses the impact of each of the proposed Plan Amendments.</p>
<p>Comment 2.3-6: Comments on the sufficiency of analysis of PA I – Change the CDCA Plan language that limits the WEMO route network to existing routes of travel as of 1980</p>	
	<p>Summary of Comments: These comments state that the Draft Supplemental EIS does not sufficiently analyze the environmental impacts of, or analyze alternatives to, proposed PA I – Change the CDCA Plan language that limits the WEMO route network to existing routes of travel as of 1980. The comments state that the Draft Supplemental EIS does not assess the impacts of the proposed change, does not provide a rationale for the proposed change, should have analyzed alternatives to the PA, and that the change was not directed by the Court.</p>
	<p>Response to Comments: The rationale for PA I, including the reasons why only two alternatives (No Action Alternative and the Proposed Action) to PA I are feasible, is provided in Section 2.1.2. The impacts of PA I, including the No Action Alternative and the Proposed Action, are specifically discussed under each resource in Chapter 4. The Draft Supplemental EIS did not claim that the Court ordered that PA I be considered. Section 1.2 of the Draft Supplemental EIS discusses the reasons for inclusion of PA I in the WMRNP, which are based on conformance with BLM regulations and guidance.</p>
<p>Comment 2.3-7: Comments on the sufficiency of analysis of PA VI – Adopt Travel Management Areas</p>	
	<p>Summary of Comments: These comments state that the Draft Supplemental EIS does not sufficiently analyze the environmental impacts of, or analyze a full range of alternatives to, proposed PA VI – Adopt Travel Management Areas. The comments state that the Draft Supplemental EIS does not consider a sufficient range of alternatives.</p>
	<p>Response to Comments: BLM used the scoping process to obtain public input into the development of TMA alternatives to be considered under PA VI. The impacts of PA VI, including the No Action Alternative and two alternative PAs, were specifically discussed under each resource in Chapter 4.</p>
<p>Comment 2.3-8: Comments on the sufficiency of analysis of PA VII – Update parameters for C Routes</p>	
	<p>Summary of Comments: These comments state that the Draft Supplemental EIS does not sufficiently analyze the environmental impacts of PA VII, which would update the parameters for Competitive (C) Routes. The comments state that the Draft Supplemental EIS does not consider a sufficient range of alternatives, does not identify the specific routes, and has not identified all resources along the proposed routes.</p>

	<p><i>Response to Comments:</i> BLM used the scoping process to obtain public input into the development of alternative parameters for C Routes to be considered under PA VII. The impacts of PA VII, including the No Action Alternative and three action alternatives, were specifically discussed under each resource in Chapter 4.</p>
<p>Comment 2.3-9: Comments on the sufficiency of analysis of PA VIII – Modify general access designations related to washes, sand dunes, and dry lakes</p>	
	<p><i>Summary of Comments:</i> These comments state that the Draft Supplemental EIS does not sufficiently analyze the environmental impacts of PA VIII, which would modify general access designations related to washes, sand dunes, and dry lakes. The comments state that the Draft Supplemental EIS does not consider a sufficient range of alternatives, does not address impacts on Cuddeback Lake, and has not identified all resources associated with the dry lakes.</p>
	<p><i>Response to Comments:</i> BLM used the scoping process to obtain public input into the development of alternative parameters for the dry lakes to be considered under PA VIII. The impacts of PA VIII, including the No Action Alternative and three action alternatives, were specifically discussed under each resource in Chapter 4. Impacts to Cuddeback Lake were discussed under all resources in Chapter 4.</p>
<p>Comment 2.3-10: Comments on the sufficiency of analysis of PA IX – Changing WEMO Plan limitations on access into Rand Mountains - Fremont Valley Management Area</p>	
	<p><i>Summary of Comments:</i> These comments state that the Draft Supplemental EIS does not sufficiently analyze the environmental impacts of PA IX – Changing WEMO Plan limitations on access into Rand Mountains - Fremont Valley Management Area. The comments state that the Draft Supplemental EIS does not provide any documentation from operation of the permit system for the past 9 years.</p>
	<p><i>Response to Comments:</i> Additional text regarding the permit system in the Rand Mountains has been added in Section 2.1.2.</p>
<p>Comment 2.3-11: Comments on the sufficiency of analysis of PA XI – Reallocate AUMs and modify allotment boundaries</p>	
	<p><i>Summary of Comments:</i> These comments state that the Draft Supplemental EIS does not sufficiently analyze the environmental impacts, or analyze a sufficient range of alternatives to, PA XI – Reallocate AUMs and modify allotment boundaries. The comments also contend that the scope of the alternatives do not conform to the recommendations of DRECP.</p>
	<p><i>Response to Comments:</i> The Draft SEIS for WMRNP was delayed to allow it to incorporate the final decisions made regarding grazing by DRECP. Proposed PA V (Update the Grazing Program to Reflect Changes made in the 2012 Appropriations Act) was made in the DRECP, so is now moot, and has been removed from the Draft SEIS. Many of the changes proposed under PA XI (Reallocate AUMs) were also made in DRECP, and have also been removed from the Draft SEIS. The only action related to grazing that remains in the WMRNP is an alternative (Alternative 2) which, under PA VII, would reallocate AUMs in active grazing allotments in DWMAAs.</p>

Table I-3: Responses to Comments on Proposed Changes to Grazing Allotments

Subsection 3.1 Comments In Favor of Grazing

Comment 3.1-1: General support for grazing components of Alternative 3	
	<p>Summary of Comments: These comments generally support the grazing components of Alternative 3. The comments do not provide specific locations, nor do they identify specific text in the Draft Supplemental EIS that is deficient.</p>
	<p>Response to Comments: The Draft SEIS for WMRNP was delayed to allow it to incorporate the final decisions made regarding grazing by DRECP. Proposed PA V (Update the Grazing Program to Reflect Changes made in the 2012 Appropriations Act) was made in the DRECP, so is now moot, and has been removed from the Draft SEIS. Many of the changes proposed under PA XI (Reallocate AUMs) were also made in DRECP, and have also been removed from the WMRNP Draft SEIS. The only action related to grazing that remains in the WMRNP is an alternative (Alternative 2) which, under PA VII, would reallocate AUMs in active grazing allotments in DWMA.s.</p>
Comment 3.1-2: Requests to continue to allow grazing in specific areas	
	<p>Summary of Comments: These comments request that grazing be allowed to continue, without changes, in specific areas.</p>
	<p>Response to Comments: The Draft SEIS for WMRNP was delayed to allow it to incorporate the final decisions made regarding grazing by DRECP. Proposed PA V (Update the Grazing Program to Reflect Changes made in the 2012 Appropriations Act) was made in the DRECP, so is now moot, and has been removed from the Draft SEIS. Many of the changes proposed under PA XI (Reallocate AUMs) were also made in DRECP, and have also been removed from the Draft SEIS. The only action related to grazing that remains in the WMRNP is an alternative (Alternative 2) which, under PA VII, would reallocate AUMs in active grazing allotments in DWMA.s.</p>

Subsection 3.2 Comments Opposed to Grazing

Comment 3.2-1: General support for the elimination of grazing proposed under Alternative 2	
	<p>Summary of Comments: These comments generally support the grazing components of Alternative 2, which would eliminate grazing. The comments do not provide specific locations, nor do they identify specific text in the Draft Supplemental EIS that is deficient.</p>
	<p>Response to Comments: The Draft SEIS for WMRNP was delayed to allow it to incorporate the final decisions made regarding grazing by DRECP. Proposed PA V (Update the Grazing Program to Reflect Changes made in the 2012 Appropriations Act) was made in the DRECP, so is now moot, and has been removed from the Draft SEIS. Many of the changes proposed under PA XI (Reallocate AUMs) were also made in DRECP, and have also been removed from the Draft SEIS. The only action related to grazing that remains in the WMRNP is an alternative (Alternative 2) which, under PA VII, would reallocate AUMs in active grazing allotments in DWMA.s.</p>
Comment 3.2-2: Requests to reduce/eliminate grazing in specific areas	
	<p>Summary of Comments: These comments request that grazing be reduced or eliminated in specific areas.</p>

	<p><i>Response to Comments:</i> The Draft SEIS for WMRNP was delayed to allow it to incorporate the final decisions made regarding grazing by DRECP. Proposed PA V (Update the Grazing Program to Reflect Changes made in the 2012 Appropriations Act) was made in the DRECP, so is now moot, and has been removed from the Draft SEIS. Many of the changes proposed under PA XI (Reallocate AUMs) were also made in DRECP, and have also been removed from the Draft SEIS. The only action related to grazing that remains in the WMRNP is an alternative (Alternative 2) which, under PA VII, would reallocate AUMs in active grazing allotments in DWMA.</p>
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Subsection 3.3 Comments Regarding the Sufficiency of the Analysis of Grazing

Comment 3.3-1: Specific comments on the sufficiency of the analysis of grazing in the Draft Supplemental EIS	
	<p><i>Summary of Comments:</i> These comments request specific changes to information provided about grazing allotments, or recommend changes in the analysis of the impacts of grazing.</p>
	<p><i>Response to Comments:</i> The Draft SEIS for WMRNP was delayed to allow it to incorporate the final decisions made regarding grazing by DRECP. Proposed PA V (Update the Grazing Program to Reflect Changes made in the 2012 Appropriations Act) was made in the DRECP, so is now moot, and has been removed from the Draft SEIS. Many of the changes proposed under PA XI (Reallocate AUMs) were also made in DRECP, and have also been removed from the Draft SEIS. The only action related to grazing that remains in the WMRNP is an alternative (Alternative 2) which, under PA VII, would reallocate AUMs in active grazing allotments in DWMA.</p>

Table I-4: Responses to Comments on the Proposed Route Network and Alternatives

Subsection 4.1 Comments on the Portrayal of Routes on Maps

Comment 4.1-1: Maps are not complete, up-to-date, or contain errors in land ownership or route configurations	
	<p>Summary of Comments: These comments point out information, such as property boundaries, land ownership, route locations, and geographic features, which are not correctly presented on the maps. These comments provide specific information, from on-the-ground observations and knowledge, of errors in the maps’ depiction of individual routes and/or land ownership. Some of the comments point out missing designations or sub-designations on the maps. The comments generally do not provide an opinion regarding whether the route ought to be opened or closed, just that the depiction of the route on the map needs to be corrected.</p>
	<p>Response to Comments: The agency has reviewed the specific issues identified in these comments and corrected the maps as needed.</p>
Comment 4.1-2: Provide additional resource layers, or added resource layers to cover specific areas, on maps	
	<p>Summary of Comments: These comments point out specific information that was not provided on the maps, such as resources that are not included in the resource layers on the maps, and therefore leave the analysis incomplete. Specific areas referenced in the comments include:</p> <ul style="list-style-type: none"> • The Black Lava Butte and Flat Top Mesa area, proposed as an ACEC in DRECP, is not shown as an ACEC on the maps. • Specific areas (such as Parson’s Ranch) should be identified as Residential Areas on the resource layers. • The layers do not identify the Morongo Basin as a critical wildlife linkage. <p>Some of the comments also contend that some of the resource layers are the same as was used in the 2006 WEMO Plan, and are therefore outdated.</p>
	<p>Response to Comments: The agency has reviewed the proposed changes to and the addition of resource layers identified in these comments, and corrected the maps as needed. Where changes to these resource layers resulted in the need to re-consider designation of one or more routes, those designation changes were made, and were accounted for in the route mileage tables in Chapter 4 of the Draft SEIS.</p>
Comment 4.1-3: Request for indication of street-legal routes on the maps	
	<p>Summary of Comments: These comments request that “street legal” routes be identified on the maps in a separate color from “motorized/open” routes, so that reviewers can determine whether routes of interest are open or closed to OHVs.</p>
	<p>Response to Comments: The maps in the Draft SEIS have been revised to show routes with the subdesignation of “street legal”, to more clearly identify these routes.</p>
Comment 4.1-4: Objection to manner in which routes are shown on maps	
	<p>Summary of Comments: These comments object to how routes are shown on the maps. Some comments state that the route types indicated on the maps do not conform to the route inventory guidance that recognizes roads, primitive roads, and trails. Others state that the change in route numbering from previous route designation efforts in WEMO makes it difficult to compare the designations, or that the subdesignations cannot be determined from the maps.</p>

	<p><i>Response to Comments:</i> Previous route numbers were used wherever viable, but the update and correction of the route inventory required substantial changes to the previous numbering system. The asset classification of routes as roads, primitive roads, and trails are not mapped in the Draft SEIS as this classification is primarily used for explaining the state of construction and maintenance on a route. However, information regarding the asset classification of each route can be found in the TMPs in Appendix G. The maps in the Draft SEIS have been updated to show route subdesignations separately.</p>
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Subsection 4.2 Comments on the Route Inventory, Baseline, and No Action Alternative Network

Comment 4.2-1: Adequacy of the Draft Supplemental EIS as a Supplement to the 2006 WEMO EIS	
	<p><i>Summary of Comments:</i> These comments state that the acknowledgement of the inaccurate route inventory used in the 2006 WEMO EIS makes all analyses in that EIS questionable, not just the issues identified as deficient by the Court. As a result, the development of the WMRNP as a Supplemental EIS, focused only on the issues identified by the Court, may not be appropriate.</p>
	<p><i>Response to Comments:</i> The Supplemental EIS is not limited to the issues identified by the Court. Though new information is considered in the Draft SEIS that addresses the issues identified by the Court, the Draft Supplemental EIS analyzed and considered all potential issues that have changed since the 2006 WEMO EIS utilizing updated route inventory and resource data. For issues where there has been no change since the 2006 EIS, the WMRNP Draft SEIS utilizes information and analysis from the 2006 EIS.</p>
Comment 4.2-2: The process for inventorying routes and trails was flawed	
	<p><i>Summary of Comments:</i> These comments state that process of relying on aerial photograph analysis to develop the route inventory is flawed because it did not include ground truthing, categorized natural features as existing routes, and failed to identify non-motorized trails. Some of the comments point out that, by failing to identify non-motorized trails and cattle trails, these features have been opened to motorcycle use, which is much more damaging to resources.</p>
	<p><i>Response to Comments:</i> As discussed on Page 2-18, the GIS route inventory data was checked against field surveys in 2012 and therefore is not based entirely on aerial photographs. The inventory data included non-motorized routes and each action alternative includes non-motorized routes. Additional text has been added to Page 2-18 to clarify that ground truthing is being conducted continually and the route inventory is updated continually as a result. In addition, BLM has encouraged the public to provide route-specific comments on the current status and use of routes and to identify any routes that may be missing from the inventory. More than 5,600 route specific comments were received in the public comment period. BLM individually reviewed these comments and made appropriate changes to route designations, subdesignations, etc. if needed. Additional changes to the route inventory and network will be made in the future as issues are identified by BLM staff, or are communicated to BLM by the public.</p>
Comment 4.2-3: The basis of the No Action Alternative is unlawful	
	<p><i>Summary of Comments:</i> These comments state that the No Action Alternative is unlawful because it is based on the WEMO 2006 designation, which was found to be unlawful, and was specifically precluded in the Court Order. The comments also contend that use of the route inventory as the baseline for analysis, instead of use of the No Action Alternative as the baseline, is unlawful, unclear, and inaccurate.</p>

	<p><i>Response to Comments:</i> The Court did not remand the No Action Alternative in place through the WMRNP process, but rather commented on the sufficiency of analysis of the alternative. The No Action Alternative represents the route designations that are currently in effect, and thus is an appropriate alternative that meets the requirements of NEPA.</p>
<p>Comment 4.2-4: BLM has not adequately signed trails in accordance with the Court order.</p>	
	<p><i>Summary of Comments:</i> These comments state that BLM has not adequately signed trails in accordance with the Court order that all routes are to be considered closed unless signed as open</p>
	<p><i>Response to Comments:</i> Since 2014, BLM has been actively signing throughout the planning area.</p>

Subsection 4.3 Comments on the Route Network Alternatives

<p>Comment 4.3-1: Range of Alternatives does not include an alternative with a reduced route network, or alternatives that would minimize impacts, as directed by the Court</p>	
	<p><i>Summary of Comments:</i> These comments state that the alternatives analyzed in the Draft Supplemental EIS do not represent a range, do not comply with the Court’s requirement to analyze an alternative with a reduced mileage of routes, do not distinguish between routes for access versus routes for recreation, and do not include alternatives that would minimize resource impacts.</p>
	<p><i>Response to Comments:</i> The Court’s Remedy Order required that the agency consider at least one alternative that analyzes a less extensive route network (Summary Judgment, Page 4 of 17, Lines 3-4). Alternative 2 was developed specifically to meet this requirement.</p>
<p>Comment 4.3-2: The Draft Supplemental EIS does not clearly describe the action</p>	
	<p><i>Summary of Comments:</i> These comments state that the Draft Supplemental EIS does not clearly describe the action that is being evaluated.</p>
	<p><i>Response to Comments:</i> The Draft SEIS maps have been revised to more clearly depict the various route subdesignations. Thus, the allowable uses on each route are further clarified. The designation and subdesignation information by route is also displayed in maps and tables in each TMP.</p>
<p>Comment 4.3-3: Analysis must include conformance with BLM management policies and regulations</p>	
	<p><i>Summary of Comments:</i> These comments state that the analysis of alternatives in the Draft Supplemental EIS does not address how the alternatives conform to BLM management policies and regulations. The comments specify Manual 6840, 43 CFR 4180, and IM-2016-013. They also request that the SEIS provide a more comprehensive discussion of the various management regulations and policies related to travel management and grazing.</p>
	<p><i>Response to Comments:</i> Special-status species are analyzed in Section 4.4. Rangeland Health Standards are analyzed in Section 4.3. In addition, BLM is consulting with USFWS on threatened and endangered species as required under the Endangered Species Act. These analyses already conform to Manual 6840 and 43 CFR 4180 and the comments do not identify any specific conformity issues. A minimization measure has been added to the list of minimization measures in Table 2.1-3 regarding consideration of IM-2016-013 in restoration activities.</p>

Subsection 4.4 Preference for Alternatives and Route Designations that Favor Route Closure or Limitation to Enhance Resource Protection

Comment 4.4-1: General opposition to Alternative 3, any alternative that increases the mileage of routes, or to designation of routes as motorized/open based on general citation of 43 CFR 8342.1 or the Court Order	
	<p><i>Summary of Comments:</i> These comments oppose adoption of Alternative 3, or generally oppose increasing the mileage of off-road vehicle (ORV) routes, and generally cite the minimization criteria in 43 CFR 8342.1, or refer to the requirements of the Court to minimize routes, as rationale to designate routes as closed. These comments typically do not provide a list of specific resources that are impacted, or do not cite a specific subsection of 43 CFR 8342.1. These comments also do not provide specific locations where routes should be closed, nor do they identify specific text in the Draft Supplemental EIS that is deficient.</p>
	<p><i>Response to Comments:</i> These are general comments that express a preference for route closure, but do not provide route-specific information. Where specific comments regarding the impact of a route to a specific resource have been made, the agency has reviewed the route designation and made revisions where appropriate.</p> <p>Both the CDCA Plan and FLPMA recognize the need to balance use of public lands with protection of public resources. As required by FLPMA, public lands must be managed in a manner that protects the quality of public land resources, and that provides for outdoor recreation and human occupancy and use (43 USC 1701(a)(8)). As discussed in Section 2.2.1 of the Draft Supplemental EIS, all alternatives incorporate the CDCA Plan goal to provide for the use and access to public lands, and resources within the CDCA, including economic, educational, scientific, and recreational uses, in a manner that enhances, wherever possible—and that does not diminish, on balance—the environmental, cultural and aesthetic values of the desert and of its productivity, as identified in Sections 601 and 103 of FLPMA. The CDCA Plan recognized the sometimes complex and conflicting mandates that provide for both use and protection of a variety of public resources, and the key role of access across public lands.</p> <p>Based on this need to balance access and resource protection, it is not possible or appropriate to close all routes that are co-located with potentially affected resources.</p>
Comment 4.4-2: General opposition to designation of routes as motorized/open based on 43 CFR 8342.1 (a)	
	<p><i>Summary of Comments:</i> These comments oppose increasing the mileage of off-road vehicle (ORV) routes based on the minimization criteria in 43 CFR 8342.1 (a). These comments generally cite one or more resources covered under 43 CFR 8342.1 (a), including soil, watershed, vegetation, air, other resources of the public lands (such as cultural resources), and wilderness suitability. These comments do not provide specific locations where routes should be closed, nor do they identify specific text in the Draft Supplemental EIS that is deficient.</p>

	<p><i>Response to Comments:</i> These are general comments that express a preference for route closure in order to protect soil, watershed, vegetation, air, other resources of the public lands (such as cultural resources), and wilderness suitability. Impacts to these resources were considered in the designation of all routes, using the process described in Section 2.1.4 of the Draft Supplemental EIS. However, these comments do not provide route-specific information. Where specific comments regarding the impact of a route to a specific resource have been made, the agency has reviewed the route designation and made revisions where appropriate. Based on the need to balance access and resource protection, it is not possible or appropriate to close all routes that are co-located with potentially affected resources.</p>
<p>Comment 4.4-3: General opposition to designation of routes as motorized/open based on 43 CFR 8342.1 (b)</p>	
	<p><i>Summary of Comments:</i> These comments oppose increasing the mileage of off-road vehicle (ORV) routes based on the minimization criteria in 43 CFR 8342.1 (b). These comments generally cite one or more resources covered under 43 CFR 8342.1 (b), including wildlife and wildlife habitats. These comments do not provide specific locations where routes should be closed, nor do they identify specific text in the Draft Supplemental EIS that is deficient.</p>
	<p><i>Response to Comments:</i> These are general comments that express a preference for route closure in order to protect wildlife, wildlife habitats, and areas designated for the protection of wildlife resources. Impacts to these resources were considered in the designation of all routes, using the process described in Section 2.1.4 of the Draft Supplemental EIS. However, these comments do not provide route-specific information. Where specific comments regarding the impact of a route to a specific resource have been made, the agency has reviewed the route designation and made revisions where appropriate. Based on the need to balance access and resource protection, it is not possible or appropriate to close all routes that are co-located with potentially affected resources.</p>
<p>Comment 4.4-4: General opposition to designation of routes as motorized/open based on 43 CFR 8342.1 (d)</p>	
	<p><i>Summary of Comments:</i> These comments oppose increasing the mileage of off-road vehicle (ORV) routes based on the minimization criteria in 43 CFR 8342.1 (d). These comments generally cite the presence of routes in or near officially designated Wilderness Areas or Wilderness Study Areas. Most of these comments do not provide specific locations where routes should be closed, nor do they identify specific text in the Draft Supplemental EIS that is deficient.</p>
	<p><i>Response to Comments:</i> These are general comments that express a preference for route closure in order to protect designated Wilderness Areas or Wilderness Study Areas. Impacts to these areas were considered in the designation of all routes, using the process described in Section 2.1.4 of the Draft Supplemental EIS. However, these comments do not provide route-specific information. Where specific comments regarding the impact of a route to a specific resource have been made, the agency has reviewed the route designation and made revisions where appropriate. Based on the need to balance access and resource protection, it is not possible or appropriate to close all routes that are co-located with potentially affected resources.</p>
<p>Comment 4.4-5: General opposition to designation of routes as motorized/open in desert washes, dry lakes, sand dune areas, and/or riparian areas</p>	
	<p><i>Summary of Comments:</i> The comments generally request that routes in desert washes, dry lake, and sand dune areas be designated as closed. The comments do not provide specific locations or rationale, nor do they identify specific text in the Draft Supplemental EIS that is deficient.</p>

	<p><i>Response to Comments:</i> These are general comments that express a preference for route closure in order to protect resources associated with desert washes, dry lakes, and/or sand dune areas. Impacts to these areas were considered in the designation of all routes, using the process described in Section 2.1.4 of the Draft Supplemental EIS. However, these comments do not provide route-specific information. Where specific comments regarding the impact of a route to a specific resource have been made, the agency has reviewed the route designation and made revisions where appropriate. Based on the need to balance access and resource protection, it is not possible or appropriate to close all routes that are co-located with potentially affected resources.</p>
Comment 4.4-6: Request routes that are duplicative be designated as closed	
	<p><i>Summary of Comments:</i> The commenters request that the WMRNP does not designate as motorized/open any vehicle routes that are duplicative. The comments do not provide specific locations, nor do they identify specific text in the Draft Supplemental EIS that is deficient.</p>
	<p><i>Response to Comments:</i> These are general comments that state a preference for closure of routes based only on duplication. Each route was individually analyzed with respect to the objectives of each alternative, identified access needs, and the user conflicts and resource protections specified in 43 CFR 8342.1. Duplication, on its own, is not a criterion in 43 CFR 8342.1 and therefore was not directly used as a criterion in the WMRNP analysis. However, in cases where duplication had led to identifiable user conflicts or resource impacts, and where the duplicative routes could be closed without unacceptable disruption to access needs, then these routes were closed. BLM has solicited input from the public regarding routes that may be causing user conflicts or resource impacts, including cases where these impacts are caused by route duplication. BLM has made changes in response to this public input, and will continue to solicit public input and make appropriate route designation changes in the future. In some cases, access needs dictated a need for adjacent routes that appear to be duplicative, but which are not actually duplicative. Therefore, the appearance of duplication on a map, on its own, cannot be used to close routes.</p>
Comment 4.4-7: Request routes that could lead to vehicle trespass be designated as closed	
	<p><i>Summary of Comments:</i> The commenters request that the WMRNP does not designate as motorized/open any vehicle routes that could lead to trespass into Wilderness Areas, across private land, or onto adjacent Federal land such as Department of Defense land or National Parks. The comments often state that designating routes adjacent to these areas gives the appearance of BLM making designations for routes that are outside of BLM jurisdiction (i.e., authorizing motorized use on the adjacent land). The comments do not provide specific locations, nor do they identify specific text in the Draft Supplemental EIS that is deficient.</p>

	<p><i>Response to Comments:</i> These are general comments that state a preference for closure of routes based only on the potential for trespass on adjacent jurisdictions. Each route was individually analyzed with respect to the objectives of each alternative, identified access needs, and the user conflicts and resource protections specified in 43 CFR 8342.1. Potential for trespass, on its own, is not a criterion in 43 CFR 8342.1 and therefore was not directly used as a criterion in the WMRNP analysis. However, in cases where trespass had led to identifiable user conflicts or resource impacts, and where the routes could be closed without unacceptable disruption to access needs, then these routes were closed. BLM has solicited input from the public regarding routes that may be causing user conflicts or resource impacts, including cases where these impacts are caused by trespass. BLM has made changes in response to this public input, and will continue to solicit public input and make appropriate route designation changes in the future. In some cases, access needs dictated a need for routes that appear to provide a potential for trespass. Therefore, the appearance of the potential for trespass, on its own, cannot be used to close routes.</p>
<p>Comment 4.4-8: Request that route designations be more closely aligned with on-the-ground data from field surveys</p>	
	<p><i>Summary of Comments:</i> The commenters question whether routes identified in the inventories actually exist on the ground. Some of them request that the WMRNP not designate as motorized/open any vehicle routes that have not been surveyed in the field within the past 5 years. Other comments suggest that field survey data would provide valuable data on route usage, which would then improve the designation process. The comments do not provide specific locations, nor do they identify specific text in the Draft Supplemental EIS that is deficient.</p>
	<p><i>Response to Comments:</i> As discussed on Page 2-18, the GIS route inventory data was checked against field surveys in 2012. Additional text has been added to Page 2-18 to clarify that ground truthing is being conducted continually and the route inventory is updated continually as a result. In addition, BLM has encouraged the public to provide route-specific comments on the current status and use of routes. More than 5,600 route specific comments were received in the public comment period. BLM individually reviewed these comments and made appropriate changes to route designations, subdesignations, etc. if needed. Additional changes to the route inventory and network will be made in the future as issues are identified by BLM staff, or are communicated to BLM by the public.</p>
<p>Comment 4.4-9: Request that all routes that have been created illegally should be designated as closed</p>	
	<p><i>Summary of Comments:</i> The comments request that all routes that have been created illegally, as a result of route proliferation, should be designated as closed in the WMRNP.</p>

	<p><i>Response to Comments:</i> These are general comments that state a preference for closure of routes based only on the manner in which they were created. Each route was individually analyzed with respect to the objectives of each alternative, identified access needs, and the user conflicts and resource protections specified in 43 CFR 8342.1. The manner of route creation, on its own, is not a criterion in 43 CFR 8342.1, and because there is no way to tell if a particular route was created illegally, this was not directly used as a criterion in the WMRNP analysis. In cases where a route may have been created illegally, it was still evaluated for access needs, user conflicts, and resource impacts, and where the routes could be closed without unacceptable disruption to access needs, then these routes were closed. BLM has solicited input from the public regarding routes that may be causing user conflicts or resource impacts, including cases where these impacts are caused by illegally-created routes. BLM has made changes in response to this public input, and will continue to solicit public input and make appropriate route designation changes in the future.</p>
Comment 4.4-10: Request routes that are not used, or are rarely used, be designated as closed	
	<p><i>Summary of Comments:</i> The commenters request that the WMRNP not designate as motorized/open any vehicle routes that are not used or are rarely used. The comments do not provide specific locations, nor do they identify specific text in the Draft Supplemental EIS that is deficient.</p>
	<p><i>Response to Comments:</i> These are general comments that state a preference for closure of routes based only on an impression that they are never, or rarely, used. Each route was individually analyzed with respect to the objectives of each alternative, identified access needs, and the user conflicts and resource protections specified in 43 CFR 8342.1. Frequency of use, on its own, is not a criterion in 43 CFR 8342.1 and therefore was not directly used as a criterion in the WMRNP analysis. However, in cases where rarely used routes could be closed without unacceptable disruption to access needs, then these routes were closed. BLM has solicited input from the public regarding routes that may be causing user conflicts or resource impacts, including cases where these impacts are caused by routes that are rarely used. BLM has made changes in response to this public input, and will continue to solicit public input and make appropriate route designation changes in the future. In some cases, access needs dictated a need for routes that appear to be rarely used, but which actually serve a valid authorized use. Therefore, the appearance of a low frequency of use, on its own, cannot be used to close routes. As discussed in the TMPs, if linear features in the WMRNP inventory show evidence of natural rehabilitation and are not readily apparent to the casual passerby on-the-ground, documentation of such conditions will be recorded and then these linear features may be removed from the inventory.</p>
Comment 4.4-11: Request routes in areas that are proposed for protection in other BLM plans be designated as closed	
	<p><i>Summary of Comments:</i> The commenters request that the WMRNP not designate as motorized/open any vehicle routes that are in areas proposed for protection under other BLM plans, including DRECP. Some of the comments request a delay in both WMRNP and DRECP so that they can be coordinated. Other comments state that the resource layers on the Draft Supplemental EIS maps should be revised to incorporate the DRECP recommendations. Some of these comments provide specific locations, while others do not. The comments do not identify specific text in the Draft Supplemental EIS that is deficient.</p>

	<p><i>Response to Comments:</i> Alternative 4 in the Draft SEIS was revised to incorporate decisions made in the DRECP. The public comment period for the WMRNP was re-opened in September 2015 in order to allow BLM to incorporate the final DRECP decisions into the evaluation of a revised WMRNP alternative (Alternative 4).</p>
Comment 4.4-12: Request routes in areas with wilderness characteristics be designated as closed	
	<p><i>Summary of Comments:</i> These comments request that specific routes, or routes in specific areas, be closed or limited due to the presence of wilderness characteristics.</p>
	<p><i>Response to Comments:</i> A finding that lands have wilderness characteristics does not imply a management decision, or a finding of suitability to become part of the National Wilderness Preservation System. Route designations are based on the lands which have been designated to be managed for wilderness characteristics under DRECP. For each of the individual routes or areas cited in the comments, BLM reviewed and re-considered the proposed designation.</p>
Comment 4.4-13: Request that camping be prohibited in areas of sensitive resources	
	<p><i>Summary of Comments:</i> The comments request that camping be prohibited in areas of sensitive resources, such as areas near sensitive cultural resource sites.</p>
	<p><i>Response to Comments:</i> These are general comments that state a preference for prohibition of camping based on proximity to sensitive resources. Each designated camping area was individually analyzed with respect to the objectives of each alternative, identified user needs, and the user conflicts and resource protections specified in 43 CFR 8342.1, which includes sensitive resources such as cultural resources. In addition, the allowable distance for vehicle-based camping from established routes was varied among the alternatives, in part to protect cultural resources. BLM has solicited input from the public regarding camping areas that may be causing user conflicts or resource impacts, including cases where there are impacts to sensitive resources. BLM has made changes in response to this public input, and will continue to solicit public input and make appropriate changes in the future. In the future, should sensitive resources, such as cultural resource sites, be at risk, BLM has the authority to limit the stopping, parking, and camping distance to protect these resources.</p>
Comment 4.4-14: Request that routes in wildlife mitigation lands be designated as closed	
	<p><i>Summary of Comments:</i> The commenters request that the WMRNP not designate as motorized/open any vehicle routes in or adjacent to lands designated as wildlife mitigation, land bank, or land trust, including lands established as mitigation for large-scale renewable energy projects, and lands managed for conservation by other agencies. Some of the comments request that mitigation lands be identified, and impacts to them specifically analyzed, in the Draft Supplemental EIS. The comments do not provide specific locations, nor do they identify specific text in the Draft Supplemental EIS that is deficient.</p>

	<p><i>Response to Comments:</i></p> <p>These are general comments that state a preference for closure of routes based only on their presence in or proximity to mitigation lands. There is no regulation or requirement for BLM to limit access in or near mitigation lands or preclude route designation within these areas. Each route was individually analyzed with respect to the objectives of each alternative, identified access needs, and the user conflicts and resource protections specified in 43 CFR 8342.1. Presence in or proximity to mitigation lands, on its own, is not a criterion in 43 CFR 8342.1 and therefore was not directly used as a criterion in the WMRNP analysis. However, in cases where routes within or adjacent to mitigation lands could be closed without unacceptable disruption to access needs, such as in the Desert Tortoise Research Natural Area, then these routes were closed. BLM has solicited input from the public and resource agencies regarding routes that may be causing user conflicts or resource impacts, including cases where these impacts are caused by routes within or adjacent to mitigation lands. BLM has made changes in response to this input, and will continue to solicit input and make appropriate route designation changes in the future.</p> <p>In some cases, access needs dictated a need for routes that are located within or adjacent to mitigation lands. Therefore, the presence of a route within or adjacent to mitigation lands, on its own, cannot be used to close routes. BLM is not making any route designations on lands not under BLM management.</p>
<p>Comment 4.4-15: Request to designate routes that are very short, or which have no name or number, or are not shown on maps, as closed</p>	
	<p><i>Summary of Comments:</i></p> <p>These comments generally request that very short routes be closed, because they do not meet basic characteristics that BLM has defined for WEMO, or because they are not named or numbered, or are not shown on maps. The comments state that these types of routes tend to occur in checker-boarded land, resulting in very short segments connecting on both ends to private land. The routes are often called “orphan routes”. The comments do not provide specific locations, nor do they identify specific text in the Draft Supplemental EIS that is deficient.</p>
	<p><i>Response to Comments:</i></p> <p>These are general comments that state a preference for closure of routes based only on their short length, or lack of an identifying route number. Each route was individually analyzed with respect to the objectives of each alternative, identified access needs, and the user conflicts and resource protections specified in 43 CFR 8342.1. Length or assignment of a route number, on its own, are not criteria in 43 CFR 8342.1 and therefore were not directly used as criteria in the WMRNP analysis. However, in cases where short routes had led to identifiable user conflicts or resource impacts, and where the short routes could be closed without unacceptable disruption to access needs, then these routes were closed. BLM has solicited input from the public regarding routes that may be causing user conflicts or resource impacts, including cases where these impacts are caused by short routes or routes with no previously designated route number or name. BLM has made changes in response to this public input, and will continue to solicit public input and make appropriate route designation changes in the future.</p> <p>In some cases, access needs dictated a need for routes that appear to be too short to support an access need. Therefore, the appearance of short routes on a map, on its own, cannot be used to close routes.</p>
<p>Comment 4.4-16: Request that crossing points of County roads be consolidated</p>	
	<p><i>Summary of Comments:</i></p> <p>These comments request that crossing points of County roads be consolidated, and signed, to minimize the number of crossing points.</p>

	<p><i>Response to Comments:</i> Throughout the WMRNP, BLM has coordinated with relevant Counties to obtain their input into the route designations, and BLM will continue to do so in the future. That input is expected to include requests to consolidate crossing points on County roads, which BLM will consider and implement where appropriate.</p>
<p>Comment 4.4-17: Request to reduce routes designated as motorized/open because agency is not properly managing the existing network</p>	
	<p><i>Summary of Comments:</i> These comments state that routes should be designated as closed because BLM is not properly managing or enforcing limitations on the existing network, and/or does not have the budget to manage the current network or an expanded network. The comments request that routes be closed to ORVs unless posted open, in order to prevent illegal new routes. The comments do not provide specific locations, nor do they identify specific text in the Draft Supplemental EIS that is deficient.</p>
	<p><i>Response to Comments:</i> Each route was individually analyzed with respect to the objectives of each alternative, identified access needs, and the user conflicts and resource protections specified in 43 CFR 8342.1. BLM considered areas of non-compliance and route proliferation when developing route designations under each alternative. In cases where non-compliance had led to identifiable user conflicts or resource impacts, and where routes in non-compliance areas could be closed without unacceptable disruption to access needs, then these routes were closed. BLM has solicited input from the public regarding routes that may be causing user conflicts or resource impacts, including routes within non-compliance and route proliferation areas. BLM has made changes in response to this public input, and will continue to solicit public input and make appropriate route designation changes in the future. Please see the section on signing in the TMPs for additional information regarding the signing of routes within the planning area, and the section on law enforcement for information on funding related to enforcement.</p>
<p>Comment 4.4-18: Request to reduce routes designated as motorized/open because of the economic impact</p>	
	<p><i>Summary of Comments:</i> These comments generally oppose OHV use resulting from route designation, because it has a negative impact on property values, County tax receipts, tourism, and/or costs for local law enforcement. The comments do not provide specific locations, nor do they identify specific text in the Draft Supplemental EIS that is deficient.</p>
	<p><i>Response to Comments:</i> Information has been added to Section 4.5.2 to discuss the potential for motorized vehicle use to have adverse impacts on property values and other socioeconomic factors. It is likely that there are localized negative effects in limited areas, but the overall effect of motorized access and recreation opportunities is positive.</p>
<p>Comment 4.4-19: Present other alternatives that reduce the number and mileage of proposed motorized routes</p>	
	<p><i>Summary of Comments:</i> These comments generally request that BLM present or analyze additional alternatives that reduce the number and mileage of motorized/open routes. The comments commonly state that none of the four alternatives are acceptable. The comments do not provide specific locations, nor do they identify specific text in the Draft Supplemental EIS that is deficient.</p>
	<p><i>Response to Comments:</i> The Court’s Remedy Order required that the agency consider at least one alternative that analyzes a less extensive route network (Summary Judgment, Page 4 of 17, Lines 3-4). Alternative 2 was developed specifically to meet this requirement.</p>

Comment 4.4-20: General support or preference for Alternative 1	
	<p><i>Summary of Comments:</i> These comments generally prefer selection of Alternative 1, the No Action Alternative. The comments do not provide specific locations, nor do they identify specific text in the Draft Supplemental EIS that is deficient.</p> <p><i>Response to Comments:</i> BLM notes your comments in support of Alternative 1. No changes have been made to the Draft SEIS.</p>
Comment 4.4-21: General support for Alternative 2	
	<p><i>Summary of Comments:</i> These comments generally prefer selection of Alternative 2. The comments do not provide specific locations, nor do they identify specific text in the Draft Supplemental EIS that is deficient.</p> <p><i>Response to Comments:</i> BLM notes your comments in support of Alternative 2. No changes have been made to the Draft SEIS.</p>
Comment 4.4-22: General support for Alternative 4	
	<p><i>Summary of Comments:</i> These comments generally support selection of Alternative 4.</p> <p><i>Response to Comments:</i> BLM notes your comments in support of Alternative 4. No changes have been made to the Draft SEIS.</p>

Subsection 4.5 Preference for Alternatives and Route Designations that Favor Route Closure or Limitation to Reduce User Conflicts, and to Enhance Non-Motorized and Non-Mechanized Recreation

Comment 4.5-1: Request routes designated for authorized land uses be limited to those uses	
	<p><i>Summary of Comments:</i> The comments generally request that routes designated for authorized land uses, such as mining or access to cell towers, be limited to those authorized uses only, and not be opened for use by OHVs. The comments do not provide specific locations, nor do they identify specific text in the Draft Supplemental EIS that is deficient.</p> <p><i>Response to Comments:</i> These are general comments that state a preference for restricting the use of routes associated with an authorized use (ROW, mining operation, etc.) to only the authorized uses of these routes. Each route was individually analyzed with respect to the objectives of each alternative, identified access needs, and the user conflicts and resource protections specified in 43 CFR 8342.1. Designation of a route for a specific, authorized use, on its own, is not a criterion in 43 CFR 8342.1 and therefore was not directly used as criteria in the WMRNP analysis. However, in cases where multiple uses of a route associated with an authorized use had led to identifiable user conflicts or resource impacts, and where the use of the route could be restricted without unacceptable disruption to access needs, then these routes were given a single subdesignation of “authorized/permitted”. BLM has solicited input from the public regarding routes that may be causing user conflicts or resource impacts, including cases where these impacts are caused by multiple uses of a route associated with an authorized use. BLM has made changes in response to this public input, and will continue to solicit public input and make appropriate route designation changes in the future.</p>

Comment 4.5-2: Comments on conflicts between motorized routes and grazing allotments	
	<p>Summary of Comments: These comments point out impacts associated with motorized vehicle routes in active grazing allotments. Some of the comments request that no new routes be designated as motorized/open in grazing allotments, or that the designation of routes does not lead to a reduction in AUMs. The comments cite current trespass and vandalism issues as rationale.</p>
	<p>Response to Comments: These are general comments that state a preference for not designating new routes in grazing allotments. The Draft SEIS for WMRNP was delayed to allow it to incorporate the final decisions made regarding grazing by DRECP. Proposed PA V (Update the Grazing Program to Reflect Changes made in the 2012 Appropriations Act) was made in the DRECP, so is now moot, and has been removed from the Draft SEIS. Many of the changes proposed under PA XI (Reallocate AUMs) were also made in DRECP, and have also been removed from the Draft SEIS. The only action related to grazing that remains in the WMRNP is an alternative (Alternative 2) which, under PA XI, would reallocate AUMs in active grazing allotments in DT ACECs.</p> <p>In addition, each route was individually analyzed with respect to the objectives of each alternative, identified access needs, and the user conflicts and resource protections specified in 43 CFR 8342.1. Presence of a route in a grazing allotment, on its own, is not a criterion in 43 CFR 8342.1 and therefore was not directly used as criteria in the WMRNP analysis. However, in cases where the presence of a route in a grazing allotment had led to identifiable user conflicts or resource impacts, and where the route could be closed without unacceptable disruption to access needs, then these routes were closed or restricted to a specific subdesignation. No AUMs were reduced (or increased) in any allotments as a result of route designation or closure.</p>
Comment 4.5-3: Request to designate routes based on full-range of recreational uses	
	<p>Summary of Comments: These comments generally request that BLM consider the full range of recreational uses, not just trail riding or OHV use, in making route designations. These are general comments that express a preference for designating for a specific recreational use, in order to enhance access and recreation opportunities and avoid conflicts between motorized use and other recreational activities. Specific recreation uses cited include hiking, biking, rockhounding, horse riding, and camping. Some of the comments object to the focus of the Draft Supplemental EIS on motorized recreation by non-street-legal vehicles, instead of non-motorized and non-mechanized recreation.</p>
	<p>Response to Comments: The comments in favor of designating routes based on all of their potential recreation uses are noted. Access and recreation opportunities were considered in the designation of all routes, using the process described in Section 2.1.4 of the Draft Supplemental EIS. However, these comments do not provide route-specific information. Where specific comments regarding the need to provide access or a certain recreation use have been made, the agency has reviewed the route designation and made revisions where appropriate.</p> <p>Based on the need to balance access and resource protection, it is not possible or appropriate to designate all routes that would enhance specific access or recreation activities.</p>
Comment 4.5-4: Request that more non-motorized and non-mechanized trails and staging areas be designated	
	<p>Summary of Comments: These comments generally provide support for hiking opportunities, or request that BLM designate more non-motorized and non-mechanized trails and staging areas for recreation use. Some of these comments are general, while others specify the desire to minimize conflicts with ORVs. Some of the comments state that the WMRNP does not conform to the TTM guidance because there is only one alternative that designates non-motorized or non-mechanized trails.</p>

	<p><i>Response to Comments:</i> The three action alternatives (Alternatives 2, 3, and 4) include trails designated as non-motorized and non-mechanized. BLM has also considered at least one staging area and additional hiking trails in response to these comments. In addition to the routes designated as non-motorized or non-mechanized, equestrians and hikers are allowed to conduct overland travel and have access to many opportunities to use the trails within the many wilderness areas in the planning area. Non-motorized and non-mechanized routes were designated based on known destinations, resource issues, and information from BLM partner organizations. BLM has solicited input from the public regarding routes that may be designated as non-motorized and non-mechanized. BLM has made changes in response to this public input, and will continue to solicit public input and make appropriate route designation changes in the future.</p>
Comment 4.5-5: Request that shooting be limited to designated areas	
	<p><i>Summary of Comments:</i> These comments generally request that BLM limit recreational shooting to designated areas in order to protect the safety of recreation users in other areas. The comments do not provide specific locations, or identify Draft Supplemental EIS text that requires revision.</p>
	<p><i>Response to Comments:</i> The designation of locations for recreational shooting is not related to travel management and is outside of the scope of the WMRNP.</p>

Subsection 4.6 Preference for Alternatives and Route Designations that Favor Route Closure or Limitation to Reduce Impacts to Residents

Comment 4.6-1: General opposition to designation of routes as motorized/open based on 43 CFR 8342.1 (c)	
	<p><i>Summary of Comments:</i> These comments oppose increasing the mileage of off-road vehicle (ORV) routes based on the minimization criteria in 43 CFR 8342.1 (c). These comments generally cite one or more impacts covered under 43 CFR 8342.1 (c), including conflicts between off-road vehicle use and other recreation uses, compatibility of off-road vehicle use with existing conditions in populated areas, taking into account noise and other factors. These comments do not provide specific locations where routes should be closed, nor do they identify specific text in the Draft Supplemental EIS that is deficient.</p>
	<p><i>Response to Comments:</i> These are general comments that express a preference for route closure based on conflicts with other route uses and recreation uses, and compatibility of OHV use with existing conditions in populated areas. These issues were considered in the designation of all routes, using the process described in Section 2.1.4 of the Draft Supplemental EIS. However, these comments do not provide route-specific information. Where specific comments regarding the impact of a route to a specific resource have been made, the agency has reviewed the route designation and made revisions where appropriate. Based on the need to balance access and resource protection, it is not possible or appropriate to close all routes that are co-located with potentially affected resources.</p>

Comment 4.6-2: Request routes that intersect or coincide with private property, County Service Area roads, or roads and highways used by licensed vehicles be designated as closed, or otherwise limited

	<p>Summary of Comments: These comments generally request that BLM close routes that intersect or coincide with private property, County Service Area roads, roads maintained and funded by residents, or roads and highways used by licensed vehicles. The rationale provided in the comments is to reduce trespass, erosion, and proliferation of routes, and to avoid conflicts with residents and accidents with vehicles. Some of the comments state that, if this project is designating motorized vehicle use on County roads, then CEQA review is required. Some of the comments request that the Draft Supplemental EIS cite County ordinances related to OHV use of county roads and on private property of others. Many of the comments specifically request that routes in residential areas be designated as open to “street-legal” vehicles only.</p>
	<p>Response to Comments: BLM has worked with San Bernardino County and made necessary adjustment to designations related to County Service Area roads. In addition, BLM has worked with the counties within the planning area, and considered all public comments, in determining where street-legal sub-designations are appropriate to address user conflicts and impacts to residents. BLM does not make route designations on County roads, and CEQA analysis is not applicable to a Federal action entirely on Federal land.</p>

Comment 4.6-3: Request routes that are in rural communities be designated as closed

	<p>Summary of Comments: The comments generally request that BLM present alternatives or designate routes to avoid rural communities. They also request that the Draft Supplemental EIS analyze the impact of the transportation network on modifying the character of rural communities. The comments do not provide specific locations, nor do they identify specific text in the Draft Supplemental EIS that is deficient.</p>
	<p>Response to Comments: These are general comments that state a preference for closure of routes based only on their presence in rural areas. The Draft Supplemental EIS addresses impacts on rural communities in its sections on air quality (3.2), socioeconomics (3.5 and 4.5), and noise (3.12 and 4.12). Each route was individually analyzed with respect to the objectives of each alternative, identified access needs, and the user conflicts and resource protections specified in 43 CFR 8342.1. Presence in rural areas, on its own, is not a criterion in 43 CFR 8342.1 and therefore was not directly used as a criterion in the WMRNP analysis. However, in cases where routes present in rural areas had led to identifiable user conflicts or resource impacts, and where the routes could be closed without unacceptable disruption to access needs, then these routes were closed. BLM has solicited input from the public regarding routes that may be causing user conflicts or resource impacts, including cases where these impacts are caused by routes in rural areas. BLM has made changes in response to this public input, and will continue to solicit public input and make appropriate route designation changes in the future. In some cases, access needs dictated a need for routes that are located in rural areas. Therefore, the presence of a route in rural areas, on its own, cannot be used to close routes.</p>

Subsection 4.7 Preference for Alternatives and Route Designations that Enhance Access and Motorized Recreation

Comment 4.7-1: Support for Alternative 3 – Enhanced Access Alternative	
	<p>Summary of Comments: These comments generally support selection of Alternative 3, or some form of an Enhanced or Pro-Recreation Alternative, based on the high demand and need for motorized access and recreation opportunities. The comments do not provide specific locations, nor do they identify specific text in the Draft Supplemental EIS that is deficient.</p>
	<p>Response to Comments: The comments in favor of selection of Alternative 3 are noted. These are general comments that express a preference for designating routes as motorized/open in order to enhance access and recreation opportunities. Access and recreation opportunities were considered in the designation of all routes, using the process described in Section 2.1.4 of the Draft Supplemental EIS. However, these comments do not provide route-specific information. Where specific comments regarding the need to provide access or recreation opportunities have been made, the agency has reviewed the route designation and made revisions where appropriate. Based on the need to balance access and resource protection, it is not possible or appropriate to designate as motorized/open all routes that enhance access or recreation.</p>
Comment 4.7-2: General opposition to designating routes as closed	
	<p>Summary of Comments: These comments generally request that BLM not close routes. These comments state that motorized vehicle use of routes does not impact resources, and that the availability of motorized/open routes has been declining, reducing opportunities for motorized recreation. Some comments point out that closure of areas and routes results in concentrating use in other areas, resulting in increased impacts to resources. The comments do not provide specific locations, nor do they identify specific text in the Draft Supplemental EIS that is deficient.</p>
	<p>Response to Comments: The comments in favor of designating routes as motorized/open are noted. These are general comments that express a preference for designating routes as motorized/open in order to enhance access and recreation opportunities. Access and recreation opportunities were considered in the designation of all routes, using the process described in Section 2.1.4 of the Draft Supplemental EIS. However, these comments do not provide route-specific information. Where specific comments regarding the need to provide access or recreation opportunities have been made, the agency has reviewed the route designation and made revisions where appropriate. Based on the need to balance access and resource protection, it is not possible or appropriate to designate as motorized/open all routes that enhance access or recreation.</p>
Comment 4.7-3: Closure of routes does not conform to regulations and court rulings	
	<p>Summary of Comments: These comments generally oppose closure of routes by stating that closures violate access to authorized uses of public land, which is guaranteed under a variety of laws, regulations, and Court rulings. The comments cite the 1872 Mining Law, Multiple Surface Use Act, National Minerals and Mining Policy, FLPMA, United States vs New Mexico 1978, and Shoemaker vs United States Department of the Interior.</p>
	<p>Response to Comments: Public access to Federal lands is subject to FLPMA and 43 CFR 8342.1 regulations. If access to a mining claim or mining operation is needed (or for any authorized use), such access can be requested; the BLM would evaluate the request and allow access if appropriate.</p>

Comment 4.7-4: Comments questioning the significance of resources being protected	
	<p>Summary of Comments: These comments question whether specific resources are significant enough to be protected by their ACEC designation.</p>
	<p>Response to Comments: Each route was individually analyzed with respect to the objectives of each alternative, identified access needs, and the user conflicts and resource protections specified in 43 CFR 8342.1. Presence of a route in an ACEC, on its own, is not a criterion in 43 CFR 8342.1 and therefore was not directly used as a criterion in the WMRNP analysis. However, the resources for which the ACEC was designated were considered as part of 43 CFR 8342.1, and in cases where the presence of a route in an ACEC has led to identifiable user conflicts or resource impacts, and where the routes could be closed without unacceptable disruption to access needs, then these routes were closed. Determination of resource significance within ACECs is outside of the scope of the WMRNP. BLM has solicited input from the public regarding routes that may be causing user conflicts or resource impacts, including cases where these impacts are caused by routes in ACECs. BLM has made changes in response to this public input, and will continue to solicit public input and make appropriate route designation changes in the future.</p>
Comment 4.7-5: Support for emphasizing mitigation measures, as opposed to route closures and limitations, to reduce user conflicts and resource impacts	
	<p>Summary of Comments: These comments generally request that BLM emphasize mitigation measures, as opposed to route closures and limitations, to reduce user conflicts and resource impacts. These are general comments that express a preference for limiting use of routes, enforcing existing limitations, use fees, and education, instead of closing routes in order to achieve resource protection. The comments do not provide specific locations, nor do they identify specific text in the Draft Supplemental EIS that is deficient.</p>
	<p>Response to Comments: The comments in favor of emphasizing mitigation measures, as opposed to route closure, are noted. Both route closure and minimization, including limitation on motorized uses, were considered in the designation of all routes, using the process described in Section 2.1.4 of the Draft Supplemental EIS. However, these comments do not provide route-specific information. Where specific comments regarding the potential for minimization, as opposed to closure, have been made, the agency has reviewed the route designation and made revisions where appropriate. Based on the need to balance access and resource protection, it is not possible or appropriate to achieve all resource protection objectives simply through mitigation, and some level of closure is appropriate.</p>
Comment 4.7-6: Support for use of maps, signs, and published information to communicate access information	
	<p>Summary of Comments: These comments generally support BLM’s use of maps, signs, and published information to communicate access and resource protection information to the public, as opposed to route closure, in order to protect resources. The comments do not provide specific locations, nor do they identify specific text in the Draft Supplemental EIS that is deficient.</p>
	<p>Response to Comments: The comments supporting the use of maps, signs, kiosks, and published information to communicate route information to users are noted. These are general comments that do not provide route-specific information. Where specific comments regarding maps, signs, and additional published information have been provided, the agency considered this information in the development and implementation of the TMPs.</p>

Comment 4.7-7: Request to designate routes as motorized/open based on need to access authorized land uses

	<p>Summary of Comments: These comments generally request that BLM consider the need for access to authorized land uses, including mining claims, in making route designations. The comments do not provide specific locations, nor do they identify specific text in the Draft Supplemental EIS that is deficient.</p>
	<p>Response to Comments: The comments in favor of designating routes as motorized/open based on the need for access to authorized uses are noted. These are general comments that express a preference for designating routes as motorized/open in order to provide access for authorized uses. Access for authorized uses was considered in the designation of all routes, using the process described in Section 2.1.4 of the Draft Supplemental EIS. However, these comments do not provide route-specific information. Where specific comments regarding the need to provide access for authorized uses have been made, the agency has reviewed the route designation and made revisions where appropriate. Based on the need to balance access and resource protection, it is not possible or appropriate to designate as motorized/open all routes that provide access to specific authorized uses. The agency has ensured that access for all authorized uses is available, but that does not mean that all routes, or the most convenient routes, to an authorized land use have been designated for access. In some cases, the access to authorized uses is a more indirect route that avoids resource impacts.</p>

Comment 4.7-8: Request that dead-end trails be connected by designating the intervening segments as motorized/open

	<p>Summary of Comments: These comments generally request that BLM avoid dead-end routes by designating as motorized/open the intervening segments. Some comments request that these be designated to improve connectivity of the network. Others cite resource impacts that can occur by motorized vehicles getting trapped in dead-end areas. The comments do not provide specific locations, nor do they identify specific text in the Draft Supplemental EIS that is deficient.</p>
	<p>Response to Comments: The comments in favor of designating routes as motorized/open in order to connect areas or routes are noted. These are general comments that express a preference for designating routes as motorized/open in order to increase the connectivity of the network. Connectivity of the network was considered in the designation of all routes, using the process described in Section 2.1.4 of the Draft Supplemental EIS. However, these comments do not provide route-specific information. Where specific comments regarding the need to increase connectivity have been made, the agency has reviewed the route designation and made revisions where appropriate.</p>

Comment 4.7-9: Request that BLM seek opportunities to expand the route network through land acquisitions

	<p>Summary of Comments: These comments generally request that existing OHV routes on newly acquired private lands be designated as motorized/open, until a complete, publicly-reviewed designation can be made. The comments also request active efforts to acquire other properties or easements to expand the network. The comments do not provide specific locations, nor do they identify specific text in the Draft Supplemental EIS that is deficient.</p>
	<p>Response to Comments: Route designation on newly acquired lands is discussed in the TMPs. BLM would follow the route designation process on any newly acquired lands every five years (or sooner, if judged to be prudent by the Implementation Team) and would comply with applicable federal regulations and statutes, which would not allow a blanket designation of all routes on newly acquired lands either as open or closed.</p>

Comment 4.7-10: Request that more single-track trails be designated	
	<p>Summary of Comments: These comments generally request that BLM designate more single-track and motorcycle trails for recreational use. The comments do not provide specific locations, nor do they identify specific text in the Draft Supplemental EIS that is deficient.</p>
	<p>Response to Comments: The three action alternatives (Alternatives 2, 3, and 4) all include routes with the subdesignation of “motorcycle”, meaning travel on these route is limited to motorcycles only – other motorized vehicles are not allowed on these routes. The maps in the Draft Supplemental EIS have been updated to show route subdesignations separately. Motorcycle routes were designated based on known destinations, resource issues, and information from BLM partner organizations. BLM has solicited input from the public regarding routes that may be designated as motorcycle routes. BLM has made changes in response to this public input, and will continue to solicit public input and make appropriate route designation changes in the future.</p>
Comment 4.7-11: Request that BLM continue to provide access to paleontology sites	
	<p>Summary of Comments: These comments generally request that BLM designate routes that provide access to paleontology sites as motorized/open, or that the Draft Supplemental EIS specifically discuss how the effect on fossil inventory and management.</p>
	<p>Response to Comments: Each route was individually analyzed with respect to the objectives of each alternative, identified access needs, and the user conflicts and resource protections specified in 43 CFR 8342.1. Access to paleontology sites, on its own, is not a criterion in 43 CFR 8342.1 and therefore was not directly used as a criterion in the WMRNP analysis. BLM has solicited input from the public regarding access needs, including access to paleontology sites. BLM has made changes in response to this public input, and will continue to solicit public input and make appropriate route designation changes in the future.</p>
Comment 4.7-12: Request that routes already on the ground in the back-country be designated as motorized/open	
	<p>Summary of Comments: These comments generally request that routes that are in the back-country, and already exist on the ground, be designated as motorized/open. The comments do not provide specific locations, nor do they identify specific text in the Draft Supplemental EIS that is deficient.</p>
	<p>Response to Comments: Each route was individually analyzed with respect to the objectives of each alternative, identified access needs, and the user conflicts and resource protections specified in 43 CFR 8342.1. Access to/within back-country areas, on its own, is not a criterion in 43 CFR 8342.1 and therefore was not directly used as a criterion in the WMRNP analysis. BLM has solicited input from the public regarding access needs, including access to/within back-country areas. BLM has made changes in response to this public input, and will continue to solicit public input and make appropriate route designation changes in the future.</p>
Comment 4.7-13: Opposed to restrictions on dispersed camping	
	<p>Summary of Comments: These comments generally oppose restrictions on camping. The comments do not provide specific locations, nor do they identify specific text in the Draft Supplemental EIS that is deficient.</p>

	<p><i>Response to Comments:</i> The WMRNP does not place any restrictions on dispersed camping. The analysis does consider restrictions on motorized vehicle access, based on access needs, user conflicts and resource impacts, as specified in 43 CFR 8342.1, and those restrictions may limit the use of vehicles to access desired camping sites. The WMRNP does designate camping areas, and BLM has solicited and incorporated input from the public regarding access to specific sites for camping. Vehicle-based camping along routes is considered for further restriction to reduce impacts to resources in accordance with 43 CFR 8342.1.</p>
<p>Comment 4.7-14: Request a protocol for coordination between BLM cultural resources staff and recreation staff</p>	
	<p><i>Summary of Comments:</i> These comments request that BLM implement a protocol for coordination between BLM cultural resources staff and recreation staff to re-direct routes around cultural resources, instead of closing them and fragmenting the network.</p>
	<p><i>Response to Comments:</i> In evaluating route designations based on access needs, user conflicts, and resource impacts, as specified in 43 CFR 8342.1, BLM considered continuity of the route network as one of the factors. In some instances, network continuity may be achieved by re-direction of routes if resource damage is occurring, though BLM would consider other alternatives to protect resources as well.</p>
<p>Comment 4.7-15: Opposed to restrictions on motorized vehicle access in washes, dry lakes, and/or sand dune areas</p>	
	<p><i>Summary of Comments:</i> These comments generally oppose any restrictions on motorized vehicle use in washes, dry lakes, and/or sand dune areas. The comments do not provide specific locations, nor do they identify specific text in the Draft Supplemental EIS that is deficient.</p>
	<p><i>Response to Comments:</i> The comments in favor of designating washes as motorized/open are noted. These are general comments that express a preference for designating washes as motorized/open. The manner in which washes are designated as motorized, closed, or limited is discussed in Section 2.1.2, in the discussion of proposed PA VIII. However, these comments do not provide route-specific information. Where specific comments regarding the route designation within a wash have been made, the agency has reviewed the route designation and made revisions where appropriate. Based on the need to balance access and resource protection, it is not possible or appropriate to designate as motorized/open all routes within washes.</p>
<p>Comment 4.7-16: Support for Alternative 3 in a specific area of Kern County</p>	
	<p><i>Summary of Comments:</i> These comments provide general support Alternative 3 in Township 10 North Range 14 West and Township 10 North Range 15 West, in Kern County, because it provides OHV opportunities, enhances the off-road riding experience, and provides resource protection.</p>
	<p><i>Response to Comments:</i> The comments in favor of selection of Alternative 3 in the specific area are noted. These are general comments that express a preference for designating routes as motorized/open in order to enhance access and recreation opportunities. Access and recreation opportunities were considered in the designation of all routes, using the process described in Section 2.1.4 of the Draft Supplemental EIS. Where specific comments regarding the need to provide access or recreation opportunities have been made, the agency has reviewed the route designation and made revisions where appropriate. Based on the need to balance access and resource protection, it is not possible or appropriate to designate as motorized/open all routes that enhance access or recreation opportunities.</p>

Comment 4.7-17: Request to address conflicts on Pacific Crest Trail	
	<i>Summary of Comments:</i> These comments request that conflicts between hikers and motorized vehicles on the Pacific Crest Trail be addressed.
	<i>Response to Comments:</i> Where BLM has identified conflicts on the Pacific Crest Trail between hikers and vehicles, BLM has made adjustments to route designations to reduce or avoid such conflicts.
Comment 4.7-18: Request that specific areas be designated as staging areas, camp sites, or horse facilities	
	<i>Summary of Comments:</i> These comments specify individual areas, and request that they be designated as staging areas, campsites, or horse facilities in order to enhance use for hiking and horseback riding. The comments do not identify specific text in the Draft Supplemental EIS that is deficient.
	<i>Response to Comments:</i> The specific areas and routes identified in these comments have been reviewed by the agency’s interdisciplinary teams, and revisions to the designations have been made, where appropriate.
Comment 4.7-20: Oppose closing trails into communities	
	<i>Summary of Comments:</i> The comments oppose closing trails that provide access for OHVs into the community, because the trails also provide access out of the community for residents.
	<i>Response to Comments:</i> The specific areas and routes identified in these comments have been reviewed by the agency’s interdisciplinary teams, and revisions to the designations have been made, where appropriate.
Comment 4.7-21: Opposition to Street Legal Only Designation	
	<i>Summary of Comments:</i> These comments oppose designating route in residential communities as street-legal only, because that designation eliminates the ability of residents who use OHVs for their ordinary transportation.
	<i>Response to Comments:</i> The current street legal designations are temporary. The ultimate designation will be made following consideration of all impacts, including impacts to residential communities.

Subsection 4.8 Recommendations for Implementation and Mitigation

Comment 4.8-1: Specific recommendations for signing	
	<i>Summary of Comments:</i> These comments make specific recommendations regarding the manner in which trails and routes should be signed.
	<i>Response to Comments:</i> Where specific comments regarding signing methods have been provided, the agency considered this information in the development and implementation of the TMPs.
Comment 4.8-2: Recommendations for specific mitigation measures to be implemented to address resource impacts	
	<i>Summary of Comments:</i> These comments provide specific recommendations for mitigation measures to be implemented to reduce resource impacts. Proposed mitigation measures include limiting access in desert tortoise conservation areas to street-legal vehicles, implementing speed limits, implementing systematic monitoring to address unanticipated impacts, maintain berms to avoid impacts to tortoise, fencing of areas to protect wildlife, and grazing buffers near water resources.

	<p>Response to Comments: BLM uses a variety of mitigation measures to protect resources. Mitigation measures related to special status species are often dictated in USFWS Biological Opinions, for which speed limits and berms are standard measures in the WEMO planning area for desert tortoise. Other mitigation measures mentioned in the comments are used where appropriate.</p>
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Subsection 4.9 Comments on the Sufficiency of Analysis of the Route Network Alternatives

Comment 4.9-1: The analysis does not follow the guidelines of the TTM Handbook H-8342	
	<p>Summary of Comments: These comments state that the analysis in the Draft Supplemental EIS does not follow the requirements of the TTM Handbook, H-8342.</p>
	<p>Response to Comments: All resources and issues discussed in 43 CFR 8342.1 are discussed in Chapters 3 and 4 of the Draft Supplemental EIS as required.</p>
Comment 4.9-2: The discussions of OHV use, trends, and impacts in the Draft Supplemental EIS are biased in favor of pro-OHV groups.	
	<p>Summary of Comments: These comments state that the discussions of OHV use, trends, and impacts in the Draft Supplemental EIS, specifically in Section 3.6, are biased in favor of a pro-OHV Plan. Some of the comments request that source information for statements about the long-term reduction in OHV access be provided.</p>
	<p>Response to Comments: Section 3.6 of the Draft Supplemental EIS discusses recreation as one of the many multiple uses allowed on BLM lands. The purpose of this section is to provide the existing conditions regarding recreation, including information regarding past and expected future trends in those conditions, to evaluate the impact of the route network alternatives on those conditions. It is not the purpose of this section to evaluate the impact of motorized recreation on all other resources and land uses within the planning area. Those evaluations are provided throughout the rest of the Draft Supplemental EIS.</p>
Comment 4.9-3: The use of the term “OHV” minimizes consideration of the impact of Off-Road Vehicles	
	<p>Summary of Comments: These comments object to the use of the term “off-highway vehicle (OHV)” in the SEIS, because it does not address the larger, more damaging issue of off-road vehicles.</p>
	<p>Response to Comments: According to the BLM Travel and Transportation Handbook, the phrase “Off-Highway Vehicle” is synonymous with “Off-Road Vehicle”.</p>
Comment 4.9-4: Specific comments regarding Sub-region and TMA boundaries	
	<p>Summary of Comments: These comments state disagreement with how specific sub-region and TMA boundaries were drawn. The specific area of interest is Homestead Valley, which was split into three different TMAs.</p>
	<p>Response to Comments: The major transportation arteries and proximity to Johnson Valley OHV area were considered in determining the boundaries of the TMAs around Homestead Valley. BLM will not be adjusting the boundaries of the TMAs, but will work with the Homestead Valley Community Council to address any issues.</p>

Comment 4.9-5: Disagree with contention that increase in route mileage would not lead to increase in miles traveled	
	<p>Summary of Comments: These comments disagree with the statements in the Draft Supplemental EIS regarding the effect of the total network mileage on the total OHV miles traveled. The comments provide rationale for the disagreement, and contend that, if this conclusion is incorrect, then the Draft Supplemental EIS underestimates the impacts to all resources.</p>
	<p>Response to Comments: Text on Pages 4.1-5 and 4.1-6 of the Draft Supplemental EIS discuss the basis for this assumption, including specific observations and data which support the assumption. Recreation levels, including OHV use, are driven by population growth and, to a lesser extent, economic conditions. The configuration and size of the network affects where OHV use occurs, but has little effect on the overall amount of use.</p>
Comment 4.9-6: Draft Supplemental EIS does not provide a detailed description of how the routes were analyzed, and document how each route was individually evaluated against the minimization criteria in 43 CFR 8342.1	
	<p>Summary of Comments: These comments state that the Draft Supplemental EIS does not sufficiently describe how the GIS analysis was done, or demonstrate how each route was individually evaluated against each of the criteria in 43 CFR 8342.1.</p>
	<p>Response to Comments: Each route was individually analyzed with respect to the objectives of each alternative, identified access needs, and the user conflicts and resource protections specified in 43 CFR 8342.1. The process used to designate routes is described in Section 2.1.4 of the Draft Supplemental EIS. Please see the text starting on page 2-18 of the Draft Supplemental EIS for how the GIS analysis was conducted and how route designation alternatives were developed.</p>
Comment 4.9-7: The Draft Supplemental EIS does not adequately analyze impacts of the proposed Plan Amendments and route networks with respect to the minimization criteria in 43 CFR 8342.1	
	<p>Summary of Comments: These comments generally state that the analysis of impacts with respect to the minimization criteria in 43 CFR 8342.1 is inadequate, or is not provided at all, in the Draft Supplemental EIS. These comments typically do not provide a list of specific resources that are impacted, or do not cite a specific subsection of 43 CFR 8342.1.</p>
	<p>Response to Comments: These are general comments that state that the analysis is inadequate, but do not provide route or resource-specific information. Where specific comments regarding the analysis of a resource has been made, the agency has reviewed the analysis and made revisions where appropriate.</p>
Comment 4.9-8: The Draft Supplemental EIS does not adequately analyze impacts of the proposed Plan Amendments and route networks with respect to 43 CFR 8342.1 (a) – Air Quality	
	<p>Summary of Comments: These comments state that the analysis of impacts with respect to the minimization criteria in 43 CFR 8342.1 (a) is inadequate, is not provided at all in the Draft Supplemental EIS, or fails to utilize and evaluate all available relevant information, including information that was used in DRECP. These comments are specific to the analysis of air quality. The comments address the impacts of dust emissions on residents, and on wildlife and vegetation.</p>

	<p><i>Response to Comments:</i> Tables 2.3-4 and 2.3-7, and Section 4.2.1.1 of the Draft Supplemental EIS, describe how proximity to sensitive receptors who could be affected by fugitive dust emissions was included in the evaluation of the route network alternatives. Section 4.4.1.2 acknowledges that fugitive dust deposition can adversely impact vegetation, and Section 4.4.2.2 acknowledges that fugitive dust can adversely impact wildlife. No changes were made to the Draft SEIS.</p>
<p>Comment 4.9-9: The Draft Supplemental EIS does not adequately analyze impacts of the proposed Plan Amendments and route networks with respect to 43 CFR 8342.1 (a) – Climate Change</p>	
	<p><i>Summary of Comments:</i> These comments state that the analysis of impacts with respect to the minimization criteria in 43 CFR 8342.1 (a) is inadequate, is not provided at all in the Draft Supplemental EIS, or fails to utilize and evaluate all available relevant information, including information that was used in DRECP. These comments are specific to the analysis of climate change.</p>
	<p><i>Response to Comments:</i> The analysis of climate change has been revised in Section 3.2.6 of the Draft SEIS, based on these comments, as well as additional guidance and requirements from EPA.</p>
<p>Comment 4.9-10: The Draft Supplemental EIS does not adequately analyze impacts of the proposed Plan Amendments and route networks with respect to 43 CFR 8342.1 (a) – Cultural Resources and Tribal Issues</p>	
	<p><i>Summary of Comments:</i> These comments state that the analysis of impacts with respect to the minimization criteria in 43 CFR 8342.1 (a) is inadequate, is not provided at all in the Draft Supplemental EIS, or fails to utilize and evaluate all available relevant information, including information that was used in DRECP. These comments are specific to the analysis of cultural resources and tribal issues. The comments address the amount of cultural resources data available, disagree that compliance with 43 CFR 8342.1 can be accomplished by consultation through SHPO and SCHP, and request that the Draft Supplemental EIS provide an analysis of environmental justice impacts based on a breakdown of ethnographic origin.</p>
	<p><i>Response to Comments:</i> Chapter 1 and Section 4.9 of the Draft Supplemental EIS have been revised to provide additional information on how cultural resources were considered. For environmental justice analysis, BLM has followed the requirements for Native American programs in E.O. 12898.</p>
<p>Comment 4.9-11: The Draft Supplemental EIS does not adequately analyze impacts of the proposed Plan Amendments and route networks with respect to 43 CFR 8342.1 (a) – Soils</p>	
	<p><i>Summary of Comments:</i> These comments state that the analysis of impacts with respect to the minimization criteria in 43 CFR 8342.1 (a) is inadequate, is not provided at all in the Draft Supplemental EIS, or fails to utilize and evaluate all available relevant information, including information that was used in DRECP. These comments are specific to the analysis of soil resources. The comments contend that the Draft Supplemental EIS does not provide an inventory of erodible soils, the use of slope to evaluate the potential for soil erosion has no basis, and that the Draft Supplemental EIS focuses only on erosion instead of compaction and loss of soil function.</p>
	<p><i>Response to Comments:</i> BLM acquired and evaluated additional GIS layers related to potential soil erosion, and incorporated that additional information into the revised route network in Alternative 4. Additional text describing this new information has been added to Section 3.3.1 of the Draft SEIS.</p>

Comment 4.9-12: The Draft Supplemental EIS does not adequately analyze impacts of the proposed Plan Amendments and route networks with respect to 43 CFR 8342.1 (a) – Lands With Wilderness Characteristics

	<p>Summary of Comments: These comments state that the analysis of impacts with respect to the minimization criteria in 43 CFR 8342.1 (a) is inadequate, is not provided at all in the Draft Supplemental EIS, or fails to utilize and evaluate all available relevant information, including information that was used in DRECP. These comments are specific to the analysis of impacts to lands with wilderness characteristics.</p>
	<p>Response to Comments: Route designations are based on the lands which have been designated to be managed for wilderness characteristics under DRECP. For each of the individual routes or areas cited in the comments, BLM reviewed and re-considered the proposed designation.</p>

Comment 4.9-13: The Draft Supplemental EIS does not adequately analyze impacts of the proposed Plan Amendments and route networks with respect to 43 CFR 8342.1 (a) – Water, Seeps, and Springs

	<p>Summary of Comments: These comments state that the analysis of impacts with respect to the minimization criteria in 43 CFR 8342.1 (a) is inadequate, is not provided at all in the Draft Supplemental EIS, or fails to utilize and evaluate all available relevant information, including information that was used in DRECP. These comments are specific to the analysis of surface water, seeps, springs, and riparian areas. The comments contend that the Draft Supplemental EIS does not analyze impacts to springs and seeps, that it does not evaluate compliance of the WMRNP with state water regulations, and that it does not evaluate hydrologic changes that could lead to flooding.</p>
	<p>Response to Comments: Surface water impacts are discussed throughout Section 4.3.2 Water Resources. Impacts to springs are discussed in Sections 4.3.2 Water Resources and 4.3.3 Riparian Areas. Seeps are discussed in the Section 4.3.3 Riparian Areas in the discussion of PAs, specifically PA XI under each alternative. Seeps are also discussed in Section 4.4.1 Vegetation in the table for each alternative describing acreage and mileage of routes within identified vegetation communities. Text has been added to discuss impacts of compacted routes on hydrology in Section 3.3.2.2.</p>

Comment 4.9-14: The Draft Supplemental EIS does not adequately analyze impacts of the proposed Plan Amendments and route networks with respect to 43 CFR 8342.1 (a) – Vegetation

	<p>Summary of Comments: These comments state that the analysis of impacts with respect to the minimization criteria in 43 CFR 8342.1 (a) is inadequate, is not provided at all in the Draft Supplemental EIS, or fails to utilize and evaluate all available relevant information, including information that was used in DRECP. These comments are specific to the analysis of vegetation. The comments contend that the Draft Supplemental EIS does not analyze impacts to Unusual Plant Assemblages (UPAs), specific species (desert cymopterus and Sanicle cymopterus), and the effects on the WMRNP on invasive plants. Some comments request that site-specific botanical surveys be conducted in areas where OHV routes would be designated.</p>
	<p>Response to Comments: Desert cymopterus and Ripley’s cymopterus (Cymopterus ripleyi var. saniculoides) are discussed in Section 4.4.1 Vegetation in the table for each alternative describing acreage and mileage of routes within identified vegetation communities. UPAs are discussed in section 4.3.3 Riparian Areas and throughout section 4.4.1 Vegetation Resources. Invasive species are discussed throughout Section 4.4.1 Vegetation. BLM is required to consider the best available data when conducting the NEPA analysis and there is no requirement for BLM to survey each individual species in order to complete NEPA analysis.</p>

Comment 4.9-15: The Draft Supplemental EIS does not adequately analyze impacts of the proposed Plan Amendments and route networks with respect to 43 CFR 8342.1 (b) – Wildlife Linkages

	<p>Summary of Comments: These comments generally state that the analysis of impacts with respect to the minimization criteria in 43 CFR 8342.1 (b) is inadequate, is not provided at all in the Draft Supplemental EIS, or fails to utilize and evaluate all available relevant information, including information that was used in DRECP. These comments request that the analysis address <i>A Linkage Design for the Joshua Tree-Twenty-nine Palms Connection</i>, in evaluating the impact of routes on wildlife.</p>
	<p>Response to Comments: BLM has acquired and considered the referenced document.</p>

Comment 4.9-16: The Draft Supplemental EIS does not adequately analyze impacts of the proposed Plan Amendments and route networks with respect to 43 CFR 8342.1 (b) – Desert Tortoise

	<p>Summary of Comments: These comments generally state that the analysis of impacts with respect to the minimization criteria in 43 CFR 8342.1 (b) is inadequate, is not provided at all in the Draft Supplemental EIS, or fails to utilize and evaluate all available relevant information, including information that was used in DRECP. These comments are specific to the analysis of impacts to the desert tortoise. The comments provide additional sources of data that were not considered in the Draft Supplemental EIS, and comment on additional source of impacts, such as habitat fragmentation, which they contend were not evaluates in the Draft Supplemental EIS. Some comments request that site-specific wildlife surveys be conducted in areas where OHV routes would be designated.</p>
	<p>Response to Comments: Impacts to the desert tortoise are discussed throughout Section 4.4.2 Wildlife Resources and specifically on pages 4.4-47-50 with mitigation measures listed on page 4.4-53. Habitat fragmentation impacts are discussed on page 4.4-51. BLM is required to consider the best available data when conducting the NEPA analysis and there is no requirement for BLM to survey each individual species in order to complete NEPA analysis.</p>

Comment 4.9-17: The Draft Supplemental EIS does not adequately analyze impacts of the proposed Plan Amendments and route networks with respect to 43 CFR 8342.1 (b) – Mohave Ground Squirrel

	<p>Summary of Comments: These comments generally state that the analysis of impacts with respect to the minimization criteria in 43 CFR 8342.1 (b) is inadequate, is not provided at all in the Draft Supplemental EIS, or fails to utilize and evaluate all available relevant information, including information that was used in DRECP. These comments are specific to the analysis of impacts to Mohave ground squirrel. Some comments request that site-specific wildlife surveys be conducted in areas where OHV routes would be designated.</p>
	<p>Response to Comments: Impacts to the Mohave ground squirrel are discussed throughout Section 4.4.2 Wildlife Resources and specifically on pages 4.4-50 and 51 with mitigation measures listed on page 4.4-54. BLM is required to consider the best available data when conducting the NEPA analysis and there is no requirement for BLM to survey each individual species in order to complete NEPA analysis.</p>

Comment 4.9-18: The Draft Supplemental EIS does not adequately analyze impacts of the proposed Plan Amendments and route networks with respect to 43 CFR 8342.1 (b) – Mojave Fringe-Toed Lizard

	<p><i>Summary of Comments:</i> These comments generally state that the analysis of impacts with respect to the minimization criteria in 43 CFR 8342.1 (b) is inadequate, is not provided at all in the Draft Supplemental EIS, or fails to utilize and evaluate all available relevant information, including information that was used in DRECP. These comments are specific to the analysis of impacts to Mojave fringe-toed lizard. Some comments request that site-specific wildlife surveys be conducted in areas where OHV routes would be designated.</p>
	<p><i>Response to Comments:</i> Impacts to the Mojave fringe-toed lizard are discussed throughout Section 4.4.2 Wildlife Resources and specifically on page 4.4-50. BLM is required to consider the best available data when conducting the NEPA analysis and there is no requirement for BLM to survey each individual species in order to complete NEPA analysis. Section 3.4.3.2.3 discusses how information regarding Mojave fringe-toed lizard was updated with information from the DRECP Baseline Biology Report, and the results of surveys conducted specifically to support the WMRNP.</p>

Comment 4.9-19: The Draft Supplemental EIS does not adequately analyze impacts of the proposed Plan Amendments and route networks with respect to 43 CFR 8342.1 (b) – Avian Species

	<p><i>Summary of Comments:</i> These comments generally state that the analysis of impacts with respect to the minimization criteria in 43 CFR 8342.1 (b) is inadequate, is not provided at all in the Draft Supplemental EIS, or fails to utilize and evaluate all available relevant information, including information that was used in DRECP. These comments are specific to the analysis of impacts to avian species, including the yellow-billed cuckoo and burrowing owl. Some comments request that site-specific wildlife surveys be conducted in areas where OHV routes would be designated.</p>
	<p><i>Response to Comments:</i> Impacts to the avian species, including burrowing owls, are discussed throughout Section 4.4.2 Wildlife Resources and specifically on pages 4.4-51-52. BLM is required to consider the best available data when conducting the NEPA analysis and there is no requirement for BLM to survey each individual species in order to complete NEPA analysis. Information regarding the yellow-billed cuckoo was added to Section 4.4.2.2.</p>

Comment 4.9-20: The Draft Supplemental EIS does not adequately analyze impacts of the proposed Plan Amendments and route networks with respect to 43 CFR 8342.1 (b) – Mitigation Lands

	<p><i>Summary of Comments:</i> These comments generally state that the analysis of impacts with respect to the minimization criteria in 43 CFR 8342.1 (b) is inadequate, is not provided at all in the Draft Supplemental EIS, or fails to utilize and evaluate all available relevant information, including information that was used in DRECP. These comments are specific to the analysis of impacts to lands established as mitigation lands for solar and other projects.</p>
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	<p><i>Response to Comments:</i></p> <p>These are general comments that state a preference for closure of routes based only on their presence in or proximity to mitigation lands. There is no regulation or requirement for BLM to limit access in or near mitigation lands or preclude route designation within these areas. Each route was individually analyzed with respect to the objectives of each alternative, identified access needs, and the user conflicts and resource protections specified in 43 CFR 8342.1. Presence in or proximity to mitigation lands, on its own, is not a criterion in 43 CFR 8342.1 and therefore was not directly used as a criterion in the WMRNP analysis. However, in cases where routes within or adjacent to mitigation lands could be closed without unacceptable disruption to access needs, such as in the Desert Tortoise Research Natural Area, then these routes were closed. BLM has solicited input from the public and resource agencies regarding routes that may be causing user conflicts or resource impacts, including cases where these impacts are caused by routes within or adjacent to mitigation lands. BLM has made changes in response to this input, and will continue to solicit input and make appropriate route designation changes in the future.</p> <p>In some cases, access needs dictated a need for routes that are located within or adjacent to mitigation lands. Therefore, the presence of a route within or adjacent to mitigation lands, on its own, cannot be used to close routes. BLM is not making any route designations on lands not under BLM management.</p>
<p>Comment 4.9-21: The Draft Supplemental EIS does not adequately analyze impacts of the proposed Plan Amendments and route networks with respect to 43 CFR 8342.1 (b) – Bighorn Sheep</p>	
	<p><i>Summary of Comments:</i></p> <p>These comments generally state that the analysis of impacts with respect to the minimization criteria in 43 CFR 8342.1 (b) is inadequate, is not provided at all in the Draft Supplemental EIS, or fails to utilize and evaluate all available relevant information, including information that was used in DRECP. These comments are specific to the analysis of impacts to bighorn sheep.</p>
	<p><i>Response to Comments:</i></p> <p>Impacts to the bighorn sheep are discussed throughout Section 4.4.2 Wildlife Resources and specifically on page 4.4-51. BLM is required to consider the best available data when conducting the NEPA analysis and there is no requirement for BLM to survey each individual species in order to complete NEPA analysis.</p>
<p>Comment 4.9-22: The Draft Supplemental EIS does not adequately analyze impacts of the proposed Plan Amendments and route networks with respect to 43 CFR 8342.1 (c)</p>	
	<p><i>Summary of Comments:</i></p> <p>These comments generally state that the analysis of impacts with respect to the minimization criteria in 43 CFR 8342.1 (c) is inadequate, is not provided at all in the Draft Supplemental EIS, or fails to utilize and evaluate all available relevant information, including information that was used in DRECP. These comments generally cite one or more impacts covered under 43 CFR 8342.1 (c), including conflicts between off-road vehicle use and other recreation uses, compatibility of off-road vehicle use with existing conditions in populated areas, taking into account noise and other factors.</p>
	<p><i>Response to Comments:</i></p> <p>These are general comments that state that the analysis of conflicts between off-road vehicle use and other recreation uses, compatibility of off-road vehicle use with existing conditions in populated areas, taking into account noise and other factors, is inadequate. BLM has solicited input from the public regarding routes that may be causing user conflicts and received many route-specific comments related to conflicts with personal property. BLM has made changes in response to this public input, particularly increasing the routes with the subdesignation of “street legal”, and will continue to solicit public input and make appropriate route designation changes in the future. Noise impacts are discussed in Section 4.12 Noise. Air quality impacts are discussed in Section 4.2 Air Quality.</p>

Comment 4.9-23: The Draft Supplemental EIS does not adequately analyze impacts of the proposed Plan Amendments and route networks with respect to 43 CFR 8342.1 (d)

	<p>Summary of Comments: These comments generally state that the analysis of impacts with respect to the minimization criteria in 43 CFR 8342.1 (d) is inadequate, is not provided at all in the Draft Supplemental EIS, or fails to utilize and evaluate all available relevant information, including information that was used in DRECP. These comments generally cite the route network in officially designated Wilderness Areas or Wilderness Study Areas.</p>
	<p>Response to Comments: BLM is not designating routes within designated wilderness areas. Presence of routes in WSAs and LWC areas were considered in the designation of all routes, using the process described in Section 2.1.4 of the Draft Supplemental EIS. Route designations are based on the lands which have been designated to be managed for wilderness characteristics under DRECP. For each of the individual routes or areas cited in the comments, BLM reviewed and re-considered the proposed designation.</p>

Comment 4.9-24: The Draft Supplemental EIS does not properly analyze impacts that would occur to National Park Service lands

	<p>Summary of Comments: These comments state that the analysis in the Draft Supplemental EIS does not properly address impacts that would occur to National Park Service lands. The comments do not specify what impacts should be evaluated, and do not identify specific text that is deficient.</p>
	<p>Response to Comments: BLM coordinated with the National Park Service regarding route designation and impacts to National Park Service lands, as well as other adjacent jurisdictions.</p>

Comment 4.9-25: Draft Supplemental EIS must address ability for BLM to implement and enforce the Minimization Measures

	<p>Summary of Comments: These comments generally state that the Draft Supplemental EIS should address the ability for BLM to implement and enforce the minimization measures, including the necessary funding to provide enforcement.</p>
	<p>Response to Comments: Implementation and enforcement of route designations are discussed in the TMPs; implementation is discussed throughout Section 5 Travel and Transportation Management Implementation Strategies and enforcement is discussed in Section 5.6 Enforcement. Text has been added to Appendix G that discusses funding related to enforcement.</p>

Comment 4.9-26: Draft Supplemental EIS must address impacts on enforcement by other agencies

	<p>Summary of Comments: These comments state that the Draft Supplemental EIS must include an evaluation of the impact of the WMRNP on the capacity or capability of other enforcement agencies to respond to OHV-related complaints.</p>
	<p>Response to Comments: Route designation should not impair the ability of other enforcement agencies to respond to complaints within their jurisdictions. BLM is responsible for responding to OHV-related complaints on BLM lands. It is the responsibility of other law enforcement agencies to respond to OHV-complaints on lands that are not managed by BLM. BLM has coordinated with adjacent jurisdictions, including counties, to ensure that appropriate access is maintained on BLM lands for their required activities, such as law enforcement.</p>

Comment 4.9-27: The analysis of competitive events should include an evaluation of the impacts associated with spectators to those events	
	<i>Summary of Comments:</i> These comments state that the analysis of competitive events should include an analysis of the impacts associated with large numbers of spectators to those events.
	<i>Response to Comments:</i> Text has been added to Section 4.6 of the Draft Supplemental EIS regarding spectators in designated staging areas at competitive events and the impacts of these staging areas.
Comment 4.9-28: The analysis should include an evaluation of the impacts associated with maintenance of routes	
	<i>Summary of Comments:</i> These comments state that the analysis should include an evaluation of the impacts associated with physical maintenance required for motorized routes.
	<i>Response to Comments:</i> Most routes are maintained through the use of the routes. Impacts from maintenance activities within the road prism are discussed in the Categorical Exclusion document 46.210 F under 43 CFR Title A. Any maintenance that would result in a change in the character of the road (e.g., surfacing, widening, etc.) would require further site-specific review where impacts would be evaluated on a case-by-case basis. Maintenance activities related to the WMRNP are discussed in Section 4.9 Cultural Resources and 4.4.1 Vegetation Resources.
Comment 4.9-29: The analysis of economic impacts to tourism, the tourism economy, and property values are not sufficient	
	<i>Summary of Comments:</i> These comments state that the Draft Supplemental EIS should include an analysis of the economic impacts of the alternatives on property values, tourism, and the tourism economy. The comments generally imply that the impact is negative.
	<i>Response to Comments:</i> Information has been added to Section 4.5.2 to discuss the potential for motorized vehicle use to have adverse impacts on property values and other socioeconomic factors. It is likely that there are localized negative effects in limited area, but the overall effect of motorized access and recreation opportunities is positive.
Comment 4.9-30: The cumulative analysis in the Draft Supplemental EIS does not include the detailed analyses required by NEPA	
	<i>Summary of Comments:</i> These comments generally state the cumulative impact analysis in the Draft Supplemental EIS does not contain the level of detail required, or request specific analysis of cumulative impacts associated with renewable energy projects. The comments do not provide specific examples, or identify specific text in the Draft Supplemental EIS that is deficient.
	<i>Response to Comments:</i> Section 4.14 acknowledges renewable energy projects as part of the cumulative scenario, and discuss their cumulative impacts with respect to global climate change and biological resources. In addition, the integration of the WMRNP with the DRECP incorporates the analysis of renewable energy projects considered in the DRECP.
Comment 4.9-31: The analysis does not meet the NEPA requirement to identify all irreversible and irretrievable commitments of resources	
	<i>Summary of Comments:</i> These comments state that the Draft Supplemental EIS does not identify all irreversible and irretrievable commitments of resources, as required by NEPA. One comment specifically discusses irreversible soil erosion impacts.

	<p><i>Response to Comments:</i> Additional information regarding soil erosion has been added to Section 5.2. In general, soil erosion impacts are not considered irretrievable and irreversible impacts.</p>	
<p>Comment 4.9-32: Recommendations for specific wording changes or factual corrections in the Draft Supplemental EIS</p>		
	<p><i>Summary of Comments:</i> These comments recommend specific wording changes or factual corrections to be made in the Draft Supplemental EIS. Some of the comments are made by other agencies or landowners, in order to provide a more accurate description of their agency, their lands, or their role in transportation planning. Others are made by reviewers who noted inaccurate statements or missing analyses in the Draft Supplemental EIS. Some commenters identified text that had been adopted out of the 2006 WEMO EIS, without having been updated. Some comments recommended additional projects to be included in the cumulative analysis.</p>	
	<p><i>Response to Comments:</i> The agency has reviewed the individual proposed text changes, and made corrections to the text of the Draft SEIS, where appropriate.</p>	
<p>Comment 4.9-33: Request for information on specific activities or resources</p>		
	<p><i>Summary of Comments:</i> These comments request that BLM provide information on proposed activities, routes, or resources. The comments are generally not phrased as identifying a deficiency in the Draft Supplemental EIS, or requesting a change in the Draft Supplemental EIS.</p>	
	<p><i>Response to Comments:</i> Responses to each specific comment are provided in the column top the right of the comment number.</p>	
	<p>Requests information on why routes that are not designated with an O, C, or L are included in the alternative route networks.</p>	<p>Response: Section 2.1.2 of the Draft Supplemental EIS discusses how terminology has changed, and that routes are no longer designated as O, C, or L.</p>
	<p>Requests that the specific details of the Sign Implementation Strategy be described.</p>	<p>Response: Please see Section 5.5.1 Signing in the TMPs for additional information regarding the signing of routes within the planning area.</p>
	<p>Request a description of what uses are approved when a route is shown on the maps as “green”. Specifically refers to Route 78343, Sullivan Street.</p>	<p>Response: The maps in the Draft Supplemental EIS have been updated to show route subdesignations separately to provide clarification regarding what uses are allowed on each route.</p>
	<p>Request a description of how BLM plans to coordinate with private property owners, including routes designated as open that are fenced</p>	<p>Response: BLM has been considering, and will continue to consider, information provided by the public, including private property owners, on fenced routes, and will make adjustments to the route network or as conditions change on the ground.</p>

**WEST MOJAVE (WEMO) ROUTE NETWORK PROJECT
SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT
APPENDIX I – RESPONSE TO COMMENTS ON DRAFT SUPPLEMENTAL EIS**

	<p>Requests that BLM describe how access routes for construction of new transmission line and wind energy projects will be designated, including whether they will be accessible for recreation.</p>	<p>Response: Routes needed for construction of new energy projects will be considered temporary routes and not designated as part of the transportation network. The third-party building the energy project would be responsible for the decommissioning, reclamation and restoration of the route upon completion of the project. At the terminus of the project during the termination, revocation or abandonment process, the BLM will specifically address whether the route has public purpose and if so redesignate the route accordingly and absolve the third-party of any maintenance and restoration responsibility. While these routes are specifically authorized, they may be designated for used by a variety of users or as “authorized use only” for all or certain modes-of-transport. These temporary routes would not be available for public use unless the BLM redesignates them as such.</p>
	<p>Request a description of how the minimization criteria for Alternatives 2 and 3, in Tables 2.3-4 and 2.3-7, resulted in such vastly different route networks.</p>	<p>Response: There are two ways in which different route networks resulted from the application of these minimization triggers. The quantitative parameters for soil erosion, air quality, cultural resources, and noise differed between the tables. Then, there were differences in what minimization action was taken in response to a trigger. For example, the trigger for a route near a special status species may have resulted in closure of the route under Alternative 2, but placement of other minimization measures, such as further limits on stopping, parking, and camping, in Alternative 3.</p>
	<p>Request information on how the WMRNP, including changes to grazing allotments, affects horse and burro management.</p>	<p>Response: The WMRNP does not affect horse and burro management. The effects are considered short-term and nominal.</p>
	<p>Requests an explanation of how motorcycle routes are maintained.</p>	<p>Response: Routes are generally maintained through use of the route, though there could be route restrictors where motorcycle routes join with other routes. Active route maintenance may occur by hand to address specific issues such as erosion.</p>
	<p>Requests an explanation of why no hiking trails are designated in Alternative 2.</p>	<p>Response: As noted in Table 2.4-1 on page 2-87, there are 28 miles of non-motorized routes not designated prior to 2012.</p>

**WEST MOJAVE (WEMO) ROUTE NETWORK PROJECT
 SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT
 APPENDIX I – RESPONSE TO COMMENTS ON DRAFT SUPPLEMENTAL EIS**

	<p>Requests a description of BLM’s vision and preferred outcome for the Juniper Flats sub-region, and the management decisions being made to meet that goal. Request a separate management plan for Juniper Flats.</p>	<p>Response: The TMP for TMA 3 describes management of routes within the Juniper Flats sub-region. No separate management plans for sub-regions are proposed at this time.</p>
	<p>Questions whether an economic analysis of the WMRNP was developed.</p>	<p>Response: The Draft SEIS evaluates the socio-economic impacts of the project, which is partially based on the economic analysis (Gobar 2003) that was developed for the 2006 WEMO Plan.</p>

Table I-5: Requests to Makes Changes to Designations for Specific Routes or Areas

Subsection 5.1 TMA 1

Comment 5.1-1: Maintain access for rock and gem collecting	
	<p>Summary of Comments: These comments request that specific routes, or routes in specific areas, be opened to provide access for rock and gem collecting.</p>
	<p>Response to Comments: For each of the individual routes or areas cited in the route-specific comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to with respect to the specific comment, as well as other use and resource protection factors cited in 43 CFR 8342.1.</p>
Comment 5.1-2: Maintain public motorized access	
	<p>Summary of Comments: These comments request that specific routes, or routes in specific areas, be opened to provide public motorized access. Some of these comments specify the types of motorized vehicles for which access is requested.</p>
	<p>Response to Comments: For each of the individual routes or areas cited in the route-specific comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to with respect to the specific comment, as well as other use and resource protection factors cited in 43 CFR 8342.1.</p>

Subsection 5.2 TMA 2

Comment 5.2-1: Maintain access for rock and gem collecting	
	<p>Summary of Comments: These comments request that specific routes, or routes in specific areas, be opened to provide access for rock and gem collecting.</p>
	<p>Response to Comments: For each of the individual routes or areas cited in the route-specific comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to with respect to the specific comment, as well as other use and resource protection factors cited in 43 CFR 8342.1.</p>
Comment 5.2-2: Maintain public motorized access	
	<p>Summary of Comments: These comments request that specific routes, or routes in specific areas, be opened to provide public motorized access. Some of these comments specify the types of motorized vehicles for which access is requested.</p>
	<p>Response to Comments: For each of the individual routes or areas cited in the route-specific comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to with respect to the specific comment, as well as other use and resource protection factors cited in 43 CFR 8342.1.</p>
Comment 5.2-3: Maintain administrative access for research	
	<p>Summary of Comments: These comments request that specific routes, or routes in specific areas, be made accessible for specific research activities.</p>

	<p><i>Response to Comments:</i> For each of the individual routes or areas cited in the route-specific comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to with respect to the specific comment, as well as other use and resource protection factors cited in 43 CFR 8342.1.</p>
Comment 5.2-4: Change designation based on errors in the depiction of specific routes on maps	
	<p><i>Summary of Comments:</i> These comments request that the designation of specific routes, or routes in specific areas, be changed because of errors in the depiction of these routes on the maps.</p>
	<p><i>Response to Comments:</i> For each of the individual routes or areas cited in the route-specific comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to with respect to the specific comment, as well as other use and resource protection factors cited in 43 CFR 8342.1.</p>
Comment 5.2-5: Coordinate with other agencies	
	<p><i>Summary of Comments:</i> These comments request that BLM coordinate with other agencies or landowners on the designation for specific routes or routes in specific areas.</p>
	<p><i>Response to Comments:</i> For each of the individual routes or areas cited in the route-specific comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to with respect to the specific comment, as well as other use and resource protection factors cited in 43 CFR 8342.1.</p>
Comment 5.2-6: Close or limit redundant routes	
	<p><i>Summary of Comments:</i> These comments request that specific routes, or routes in specific areas, be closed or limited because the commenter believes these routes are redundant.</p>
	<p><i>Response to Comments:</i> For each of the individual routes or areas cited in the route-specific comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to with respect to the specific comment, as well as other use and resource protection factors cited in 43 CFR 8342.1.</p>
Comment 5.2-7: Close or limit routes based on resource impacts per 43 CFR 8342.1	
	<p><i>Summary of Comments:</i> These comments request that specific routes, or routes in specific areas, be closed or limited due to resource considerations as specified in 43 CFR 8342.1.</p>
	<p><i>Response to Comments:</i> For each of the individual routes or areas cited in the route-specific comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to with respect to the specific comment, as well as other use and resource protection factors cited in 43 CFR 8342.1.</p>
Comment 5.2-9: Request additional actions from BLM, including easements and improvements for specific routes	
	<p><i>Summary of Comments:</i> These comments request that BLM issue easements, make improvements, add signing, or otherwise make administrative or physical changes to specific routes, or routes in specific areas.</p>

	<p><i>Response to Comments:</i> For each of the individual routes or areas cited in the route-specific comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to with respect to the specific comment, as well as other use and resource protection factors cited in 43 CFR 8342.1.</p>
Comment 5.2-11: Close or limit routes to address conflicts between users	
	<p><i>Summary of Comments:</i> These comments request that specific routes, or routes in specific areas, be closed or limited to address conflicts due to their use by multiple users, including residents, or the need to use private property to access the route.</p>
	<p><i>Response to Comments:</i> For each of the individual routes or areas cited in the route-specific comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to with respect to the specific comment, as well as other use and resource protection factors cited in 43 CFR 8342.1.</p>

Subsection 5.3 TMA 3

Comment 5.3-1: Maintain access for rock and gem collecting	
	<p><i>Summary of Comments:</i> These comments request that specific routes, or routes in specific areas, be opened to provide access for rock and gem collecting.</p>
	<p><i>Response to Comments:</i> For each of the individual routes or areas cited in the route-specific comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to with respect to the specific comment, as well as other use and resource protection factors cited in 43 CFR 8342.1.</p>
Comment 5.3-2: Maintain public motorized access	
	<p><i>Summary of Comments:</i> These comments request that specific routes, or routes in specific areas, be opened to provide public motorized access. Some of these comments specify the types of motorized vehicles for which access is requested.</p>
	<p><i>Response to Comments:</i> For each of the individual routes or areas cited in the route-specific comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to with respect to the specific comment, as well as other use and resource protection factors cited in 43 CFR 8342.1.</p>
Comment 5.3-4: Change designation based on errors in the depiction of specific routes on maps	
	<p><i>Summary of Comments:</i> These comments request that the designation of specific routes, or routes in specific areas, be changed because of errors in the depiction of these routes on the maps.</p>
	<p><i>Response to Comments:</i> For each of the individual routes or areas cited in the route-specific comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to with respect to the specific comment, as well as other use and resource protection factors cited in 43 CFR 8342.1.</p>
Comment 5.3-6: Close or limit redundant routes	
	<p><i>Summary of Comments:</i> These comments request that specific routes, or routes in specific areas, be closed or limited because the commenter believes these routes are redundant.</p>

	<p><i>Response to Comments:</i> For each of the individual routes or areas cited in the route-specific comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to with respect to the specific comment, as well as other use and resource protection factors cited in 43 CFR 8342.1.</p>
<p>Comment 5.3-7: Close or limit routes based on resource impacts per 43 CFR 8342.1</p>	
	<p><i>Summary of Comments:</i> These comments request that specific routes, or routes in specific areas, be closed or limited due to resource considerations as specified in 43 CFR 8342.1.</p>
	<p><i>Response to Comments:</i> For each of the individual routes or areas cited in the route-specific comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to with respect to the specific comment, as well as other use and resource protection factors cited in 43 CFR 8342.1.</p>
<p>Comment 5.3-8: Designate routes for non-motorized or authorized access only</p>	
	<p><i>Summary of Comments:</i> These comments request that specific routes, or routes in specific areas, be designated only for non-motorized uses, or that use be limited to authorized users only.</p>
	<p><i>Response to Comments:</i> For each of the individual routes or areas cited in the route-specific comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to with respect to the specific comment, as well as other use and resource protection factors cited in 43 CFR 8342.1.</p>
<p>Comment 5.3-9: Request additional actions from BLM, including easements and improvements for specific routes</p>	
	<p><i>Summary of Comments:</i> These comments request that BLM issue easements, make improvements, add signing, or otherwise make administrative or physical changes to specific routes, or routes in specific areas.</p>
	<p><i>Response to Comments:</i> For each of the individual routes or areas cited in the route-specific comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to with respect to the specific comment, as well as other use and resource protection factors cited in 43 CFR 8342.1.</p>
<p>Comment 5.3-10: Limit routes to street-legal subdesignation only in County Service Areas</p>	
	<p><i>Summary of Comments:</i> These comments generally request that BLM close routes that intersect or coincide with private property, County Service Area roads, roads maintained and funded by residents, or roads and highways used by licensed vehicles. The rationale provided in the comments is to reduce trespass, erosion, and proliferation of routes, and to avoid conflicts with residents and accidents with vehicles. Many of the comments specifically request that routes in residential areas be designated as open to “street-legal” vehicles only.</p>
	<p><i>Response to Comments:</i> For each of the individual routes or areas cited in the route-specific comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to with respect to the specific comment, as well as other use and resource protection factors cited in 43 CFR 8342.1.</p>

Comment 5.3-11: Close or limit routes to address conflicts between users	
	<p><i>Summary of Comments:</i> These comments request that specific routes, or routes in specific areas, be closed or limited to address conflicts due to their use by multiple users, including residents, or the need to use private property to access the route.</p>
	<p><i>Response to Comments:</i> For each of the individual routes or areas cited in the route-specific comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to with respect to the specific comment, as well as other use and resource protection factors cited in 43 CFR 8342.1.</p>
Comment 5.3-13: Close or limit routes based on identified safety issues	
	<p><i>Summary of Comments:</i> These comments request that specific routes, or routes in specific areas, be closed or limited due to the presence of safety issues.</p>
	<p><i>Response to Comments:</i> For each of the individual routes or areas cited in the route-specific comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to with respect to the specific comment, as well as other use and resource protection factors cited in 43 CFR 8342.1.</p>
Comment 5.3-16: Maintain access for mining claims	
	<p><i>Summary of Comments:</i> These comments request that specific routes, or routes in specific areas, be opened to provide access to mining claims.</p>
	<p><i>Response to Comments:</i> For each of the individual routes or areas cited in the route-specific comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to with respect to the specific comment, as well as other use and resource protection factors cited in 43 CFR 8342.1.</p>

Subsection 5.4 TMA 4

Comment 5.4-1: Maintain access for rock and gem collecting	
	<p><i>Summary of Comments:</i> These comments request that specific routes, or routes in specific areas, be opened to provide access for rock and gem collecting.</p>
	<p><i>Response to Comments:</i> For each of the individual routes or areas cited in the comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to access rock and gem collecting locations, as well as other use and resource protection factors cited in 43 CFR 8342.1.</p>
Comment 5.4-2: Maintain public motorized access	
	<p><i>Summary of Comments:</i> These comments request that specific routes, or routes in specific areas, be opened to provide public motorized access. Some of these comments specify the types of motorized vehicles for which access is requested.</p>

	<p><i>Response to Comments:</i> For each of the individual routes or areas cited in the route-specific comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to with respect to the specific comment, as well as other use and resource protection factors cited in 43 CFR 8342.1.</p>
Comment 5.4-3: Maintain administrative access for research	
	<p><i>Summary of Comments:</i> These comments request that specific routes, or routes in specific areas, be made accessible for specific research activities.</p>
	<p><i>Response to Comments:</i> For each of the individual routes or areas cited in the route-specific comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to with respect to the specific comment, as well as other use and resource protection factors cited in 43 CFR 8342.1.</p>
Comment 5.4-7: Close or limit routes based on resource impacts per 43 CFR 8342.1	
	<p><i>Summary of Comments:</i> These comments request that specific routes, or routes in specific areas, be closed or limited due to resource considerations as specified in 43 CFR 8342.1.</p>
	<p><i>Response to Comments:</i> For each of the individual routes or areas cited in the route-specific comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to with respect to the specific comment, as well as other use and resource protection factors cited in 43 CFR 8342.1.</p>
Comment 5.4-9: Request additional actions from BLM, including easements and improvements for specific routes	
	<p><i>Summary of Comments:</i> These comments request that BLM issue easements, make improvements, add signing, or otherwise make administrative or physical changes to specific routes, or routes in specific areas.</p>
	<p><i>Response to Comments:</i> For each of the individual routes or areas cited in the route-specific comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to with respect to the specific comment, as well as other use and resource protection factors cited in 43 CFR 8342.1.</p>
Comment 5.4-11: Close or limit routes to address conflicts between users	
	<p><i>Summary of Comments:</i> These comments request that specific routes, or routes in specific areas, be closed or limited to address conflicts due to their use by multiple users, including residents, or the need to use private property to access the route.</p>
	<p><i>Response to Comments:</i> For each of the individual routes or areas cited in the route-specific comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to with respect to the specific comment, as well as other use and resource protection factors cited in 43 CFR 8342.1.</p>

Subsection 5.5 TMA 5

Comment 5.5-1: Maintain access for rock and gem collecting	
	<p><i>Summary of Comments:</i> These comments request that specific routes, or routes in specific areas, be opened to provide access for rock and gem collecting.</p>

	<p><i>Response to Comments:</i> For each of the individual routes or areas cited in the route-specific comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to with respect to the specific comment, as well as other use and resource protection factors cited in 43 CFR 8342.1.</p>
Comment 5.5-2: Maintain public motorized access	
	<p><i>Summary of Comments:</i> These comments request that specific routes, or routes in specific areas, be opened to provide public motorized access. Some of these comments specify the types of motorized vehicles for which access is requested.</p>
	<p><i>Response to Comments:</i> For each of the individual routes or areas cited in the route-specific comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to with respect to the specific comment, as well as other use and resource protection factors cited in 43 CFR 8342.1.</p>
Comment 5.5-4: Change designation based on errors in the depiction of specific routes on maps	
	<p><i>Summary of Comments:</i> These comments request that the designation of specific routes, or routes in specific areas, be changed because of errors in the depiction of these routes on the maps.</p>
	<p><i>Response to Comments:</i> For each of the individual routes or areas cited in the route-specific comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to with respect to the specific comment, as well as other use and resource protection factors cited in 43 CFR 8342.1.</p>

Subsection 5.6 TMA 6

Comment 5.6-1: Maintain access for rock and gem collecting	
	<p><i>Summary of Comments:</i> These comments request that specific routes, or routes in specific areas, be opened to provide access for rock and gem collecting.</p>
	<p><i>Response to Comments:</i> For each of the individual routes or areas cited in the route-specific comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to with respect to the specific comment, as well as other use and resource protection factors cited in 43 CFR 8342.1.</p>
Comment 5.6-4: Change designation based on errors in the depiction of specific routes on maps	
	<p><i>Summary of Comments:</i> These comments request that the designation of specific routes, or routes in specific areas, be changed because of errors in the depiction of these routes on the maps.</p>
	<p><i>Response to Comments:</i> For each of the individual routes or areas cited in the route-specific comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to with respect to the specific comment, as well as other use and resource protection factors cited in 43 CFR 8342.1.</p>
Comment 5.6-7: Close or limit routes based on resource impacts per 43 CFR 8342.1	
	<p><i>Summary of Comments:</i> These comments request that specific routes, or routes in specific areas, be closed or limited due to resource considerations as specified in 43 CFR 8342.1.</p>

	<p><i>Response to Comments:</i> For each of the individual routes or areas cited in the route-specific comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to with respect to the specific comment, as well as other use and resource protection factors cited in 43 CFR 8342.1.</p>
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Subsection 5.7 TMA 7

Comment 5.7-1: Maintain access for rock and gem collecting	
	<p><i>Summary of Comments:</i> These comments request that specific routes, or routes in specific areas, be opened to provide access for rock and gem collecting.</p>
	<p><i>Response to Comments:</i> For each of the individual routes or areas cited in the route-specific comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to with respect to the specific comment, as well as other use and resource protection factors cited in 43 CFR 8342.1.</p>
Comment 5.7-2: Maintain public motorized access	
	<p><i>Summary of Comments:</i> These comments request that specific routes, or routes in specific areas, be opened to provide public motorized access. Some of these comments specify the types of motorized vehicles for which access is requested.</p>
	<p><i>Response to Comments:</i> For each of the individual routes or areas cited in the route-specific comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to with respect to the specific comment, as well as other use and resource protection factors cited in 43 CFR 8342.1.</p>
Comment 5.7-3: Maintain administrative access for research	
	<p><i>Summary of Comments:</i> These comments request that specific routes, or routes in specific areas, be made accessible for specific research activities.</p>
	<p><i>Response to Comments:</i> For each of the individual routes or areas cited in the route-specific comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to with respect to the specific comment, as well as other use and resource protection factors cited in 43 CFR 8342.1.</p>
Comment 5.7-4: Change designation based on errors in the depiction of specific routes on maps	
	<p><i>Summary of Comments:</i> These comments request that the designation of specific routes, or routes in specific areas, be changed because of errors in the depiction of these routes on the maps.</p>
	<p><i>Response to Comments:</i> For each of the individual routes or areas cited in the route-specific comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to with respect to the specific comment, as well as other use and resource protection factors cited in 43 CFR 8342.1.</p>
Comment 5.7-7: Close or limit routes based on resource impacts per 43 CFR 8342.1	
	<p><i>Summary of Comments:</i> These comments request that specific routes, or routes in specific areas, be closed or limited due to resource considerations as specified in 43 CFR 8342.1.</p>

	<p><i>Response to Comments:</i> For each of the individual routes or areas cited in the route-specific comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to with respect to the specific comment, as well as other use and resource protection factors cited in 43 CFR 8342.1.</p>
Comment 5.7-12: Comments specific to access in the Rands Permit Area	
	<p><i>Summary of Comments:</i> These comments propose providing access, or restricting access, in the Rands.</p>
	<p><i>Response to Comments:</i> For each of the individual routes or areas cited in the route-specific comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to with respect to the specific comment, as well as other use and resource protection factors cited in 43 CFR 8342.1.</p>
Comment 5.7-13: Close or limit routes based on identified safety issues	
	<p><i>Summary of Comments:</i> These comments request that specific routes, or routes in specific areas, be closed or limited due to the presence of safety issues.</p>
	<p><i>Response to Comments:</i> For each of the individual routes or areas cited in the route-specific comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to with respect to the specific comment, as well as other use and resource protection factors cited in 43 CFR 8342.1.</p>
Comment 5.7-14: Comments specific to the designation of C routes	
	<p><i>Summary of Comments:</i> These comments support the proposed designation of C routes.</p>
	<p><i>Response to Comments:</i> For each of the individual routes or areas cited in the route-specific comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to with respect to the specific comment, as well as other use and resource protection factors cited in 43 CFR 8342.1.</p>
Comment 5.7-15: Maintain access for mining claims	
	<p><i>Summary of Comments:</i> These comments request that specific routes, or routes in specific areas, be opened to provide access to mining claims.</p>
	<p><i>Response to Comments:</i> For each of the individual routes or areas cited in the route-specific comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to with respect to the specific comment, as well as other use and resource protection factors cited in 43 CFR 8342.1.</p>

Subsection 5.8 TMA 8

Comment 5.8-1: Maintain access for rock and gem collecting	
	<p><i>Summary of Comments:</i> These comments request that specific routes, or routes in specific areas, be opened to provide access for rock and gem collecting.</p>
	<p><i>Response to Comments:</i> For each of the individual routes or areas cited in the route-specific comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to with respect to the specific comment, as well as other use and resource protection factors cited in 43 CFR 8342.1.</p>

Comment 5.8-16: Comments specific to OHV connector	
	<p><i>Summary of Comments:</i> These comments request designation of an OHV connector route.</p>
	<p><i>Response to Comments:</i> For each of the individual routes or areas cited in the route-specific comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to with respect to the specific comment, as well as other use and resource protection factors cited in 43 CFR 8342.1.</p>
Comment 5.8-17: Change designation based on errors in the depiction of OHV Open Areas on maps	
	<p><i>Summary of Comments:</i> These comments request that the designation of specific routes, or routes in specific areas, be changed because of errors in the depiction of OHV Open Areas on the maps.</p>
	<p><i>Response to Comments:</i> For each of the individual routes or areas cited in the route-specific comments, BLM reviewed and reconsidered the proposed designation. This included consideration of the use of the route to with respect to the specific comment, as well as other use and resource protection factors cited in 43 CFR 8342.1.</p>