

TOM BUDLONG
3216 MANDEVILLE CANYON ROAD
LOS ANGELES, CA 90049

Saturday, April 18, 2015

Redundant Routes

Bureau of Land Management
California Desert District
Attn: WMRNP Plan Amendment
22835 Calle San Juan de los Lagos
Moreno Valley, CA 92553
cawemopa@blm.gov

cc:
Teri Raml, BLM CDD
22835 Calle San Juan De Los
Lagos
Moreno Valley, CA 92553
Jim Kenna
2800 Cottage Way, # W-1623
Sacramento, CA
95825-1886

Dear Sirs,

Please accept this comment on the West Mojave Route Network Project (WMRNP) and Draft Supplemental Environmental Impact Statement (SEIS), intended to amend the 1980 California Desert Conservation Area (CDCA) Plan, as amended.

This comment letter concerns redundant routes.

Redundant routes start and end at essentially the same place, following essentially the same course.

They could be called parallel routes. By disturbing more ground than necessary redundant routes are in violation of minimization criteria in 43 CFR 8342.1.

Redundant routes were a consideration in the 2006 WEMO. Elimination of route redundancy in the current WEMO SEIS appears to have been abandoned.

I briefly scanned 10-15 TMA maps looking for redundant routes. They are not hard to find. A gallery of segments showing what I found after the brief search is below.

The example immediately below shows, as close as can be counted, a strand of 8-10 closely parallel routes joining a nearly parallel strand of 5-6 closely parallel routes to make a thicker strand of about 15 parallel routes. (It looks more like a Los Angeles freeway interchange, or a Chicago railroad corridor.) If anything, this is maximization of impact, not minimization.

Parallel routes on TMA3 map 07.



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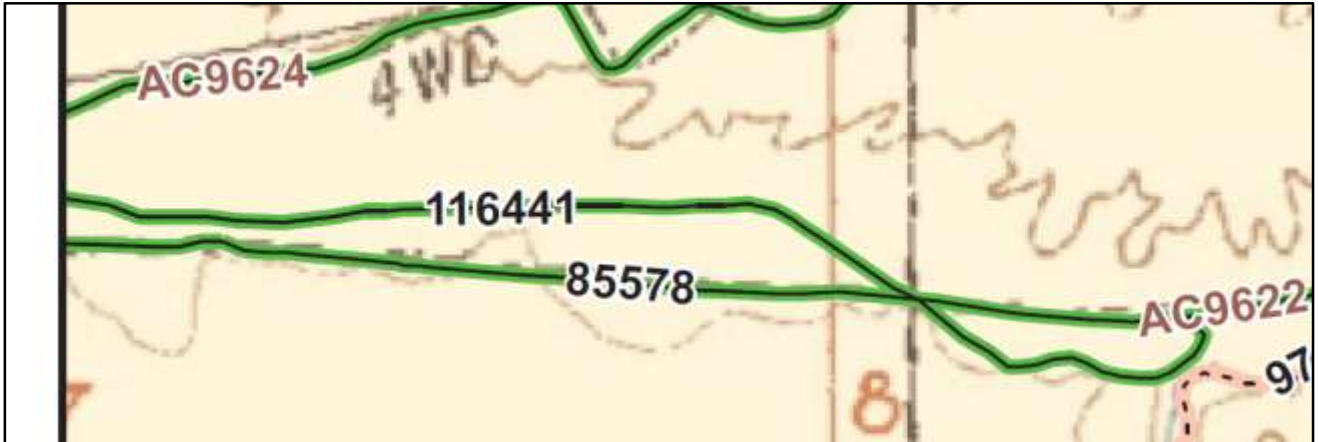
Redundant routes are a violation of the minimization requirements in 43 CFR 8242.1. Except perhaps to OHV riders that use these routes, they are visually offensive. They are a direct conflict between off-road vehicles and most other uses of the public land. They have potential to have significant negative effect on wildlife. They can easily create excessive air pollution. They are abusive. They are an indication that OHV activity has overtaken these places.

Gallery of redundant routes.

TMA1-01



TMA1-03



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These parallel routes are on map TMA1-04:



Google Earth (next page) reveals these are a desert road and a sinuous wash. The wash, 128142, obviously has a skein of related dirt bike routes.

Authorizing the wash route challenges the authority of 43 CFR 8342.1:

- Preamble: "...protection of the resources of the public lands..."
- Subsection (a): "...minimize damage to soil, watershed, vegetation, air, other resources..."
- Subsection (b): "...minimize harassment of wildlife or significant disruption of wildlife habitats,..."

Desert washes are a significant part of the desert's watershed. They are a unique habitat, different from the surroundings, attracting a different set of species of plant, animal and insect species. Dirt bike traffic harasses these.

Authorizing dirt-bike play in washes violates all these proscriptions.

Significantly, only Alternative 3 (the proposed alternative) has the wash. It appears to be a 'new' route since WEMO of 2006, or a concession to dirt-bikes.

The wash route should not be authorized in any alternative.

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Close-up Google Earth image from the same area of TMA1-04:



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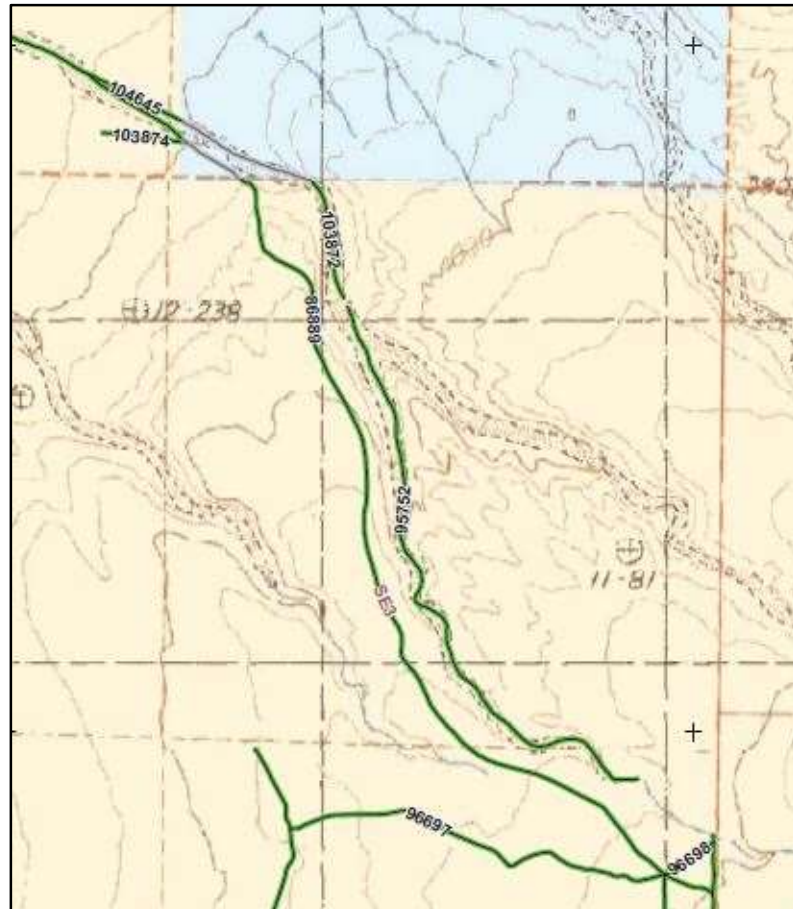
TMA1-07



TMA1-12



TMA2-02



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TMA 2-11



TMA2-14



TMA2-18



TMA3-07



TMA3-07

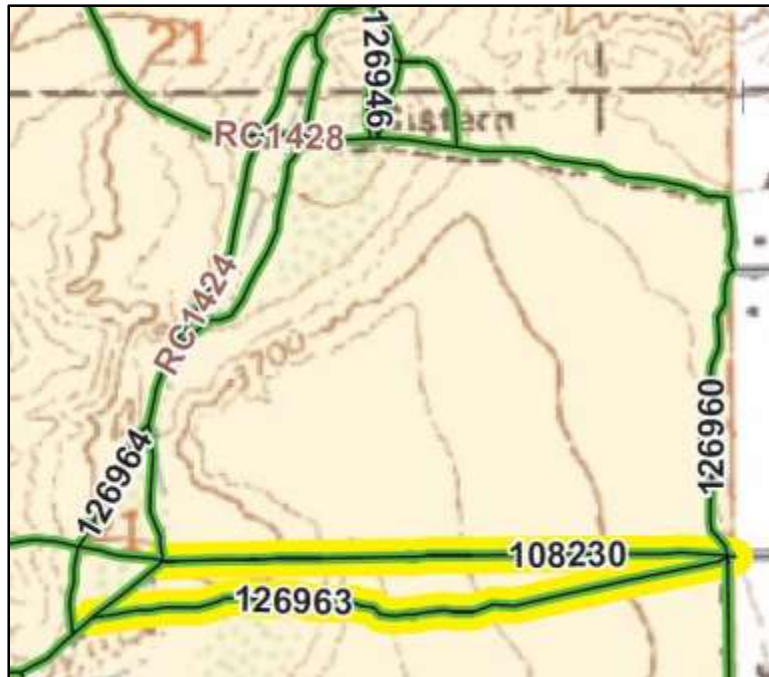


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TMA2-11



TMA3-16



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This redundant set compares TMA2 Map 16, the route map, and Google Earth. The redundant route, probably 127005, is clearly redundant. It crisscrosses what looks like an established automobile or 4WD route. It causes excess land disturbance. It increases, not minimizes damage, as prohibited in 43 CFR 8342.1. Designation as open would be unlawful.

The center of these images is approximately 549,700; 3786,325. Map TMA3-19



Sincerely,

Tom Budlong

Tom Budlong, Voice: 310-963-1731, Fax: 310-471-7531, email: TomBudlong@RoadRunner.com