

On April 13, 2018 The Wilderness Society provided The Center for Biological Diversity GIS data they received from the BLM to assist with our comments on the WEMO route designations. This GIS data consisted of a file geodatabase named 'FOIA\_BLM\_2018\_00590\_Data\_20180322.gdb'. Within that geodatabase were 4 line feature classes (layers) pertaining to the different route alternatives: 'Alt1\_March2018\_Draft\_Designations', 'Alt2\_March2018\_Draft\_Designations', 'Alt3\_March2018\_Draft\_Designations', and 'Alt4\_March2018\_Draft\_Designations'. These I will refer to these as Alternatives 1, 2, 3, and 4, respectively.

It came to our attention that in each of the alternatives there were multiple linear features that appear to have multiple duplicate, overlapping records. For example, in the Alternative 4 feature class crossing Troy Dry Lake there are identical overlapping segments of WEMO\_ID = 99042, 99058, 99059, 99061, and 99082 (Figure 1). These duplicated segments share the same geometry and have the same length and many appear to have the same WEMO\_ID numbers but different WEMOSubID numbers.

To determine the total number of duplicated route segments I used the intersect tool in ArcGIS (version 10.4.1) using only the alternative feature class as the input. This produced a feature class of just the duplicated segments. I then used the dissolve tool to 'flatten' or reduce the duplicate routes into single routes. Mileages were calculated for the 'flattened' routes and subtracted from the duplicate routes to determine the amount of error in each of the route alternatives (Table 1). The location of the duplicated routes for each of the alternatives is shown in Figures 2 – 5. I cannot determine a source of these overlapping routes as they seem to start and stop at different lengths. They could have been created during an analysis with environmental layers but that is just a guess.

Table 1. Overlapping route segments and error in each of the alternatives.

Alternative	Duplicated route segments (number)	Duplicated route segments (Miles)	Duplicated segments dissolved to single route (Miles)	Error (Miles)
1	4,121	524.8	256.8	268.0
2	14,016	480.0	234.6	245.3
3	26,260	852.4	420.3	432.1
4	40,691	1210.8	599.0	611.8

In addition to the duplicated routes issue it appears that there are multiple WEMO\_ID numbers for the same linear feature. For example, in Figure 1 showing Troy Dry Lake, there are 5 different WEMO\_IDs on the same 1.5 mile stretch of road. This makes referencing route numbers a daunting task if one had to include all the different WEMO\_ID for a particular road.

Sincerely,

Curt Bradley  
Senior Scientist/GIS Specialist  
Center for Biological Diversity

Figure 1. Duplicate alternative 4 routes near Troy Dry Lake

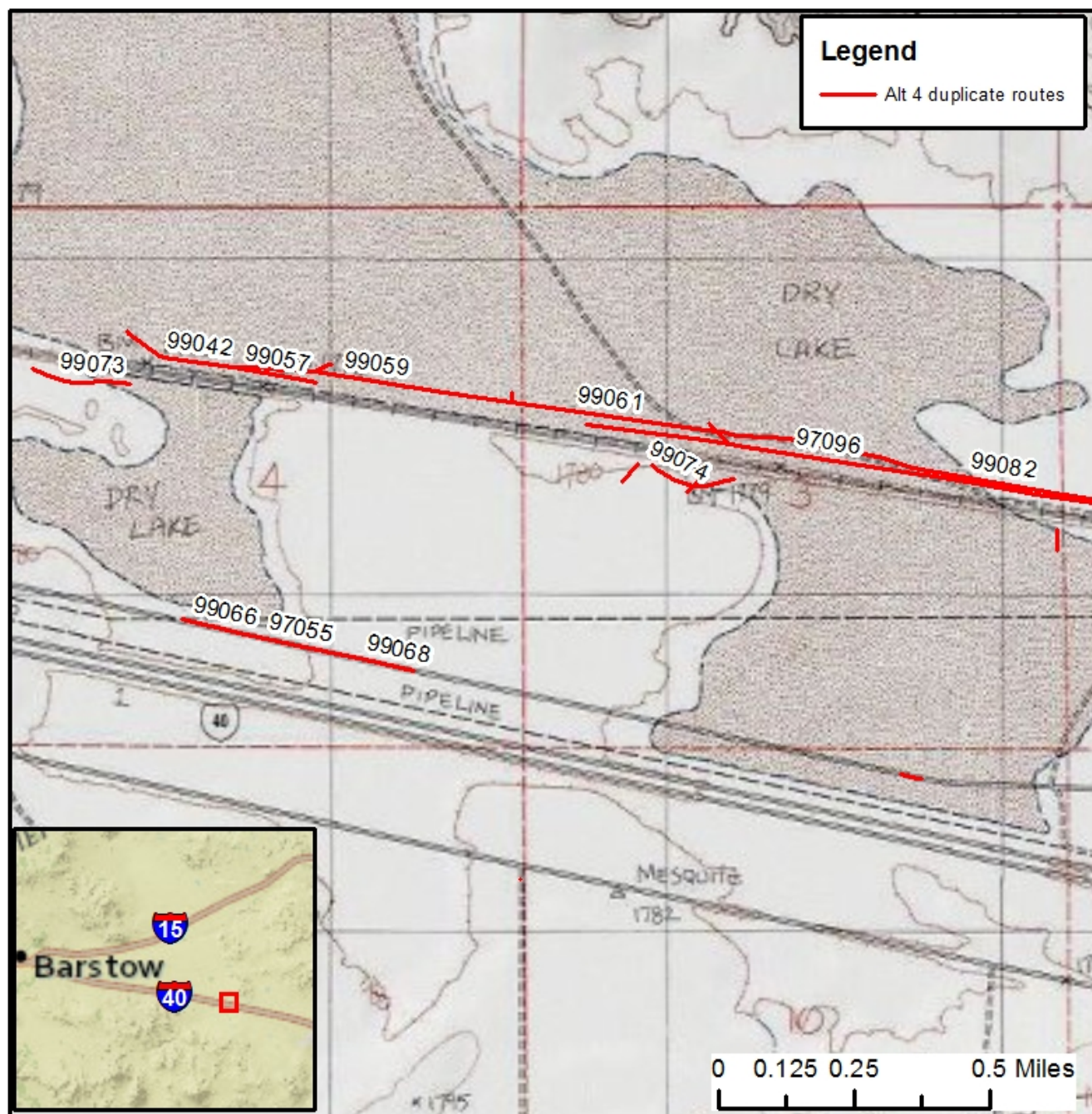




Figure 2. Alternative 1 duplicate routes.

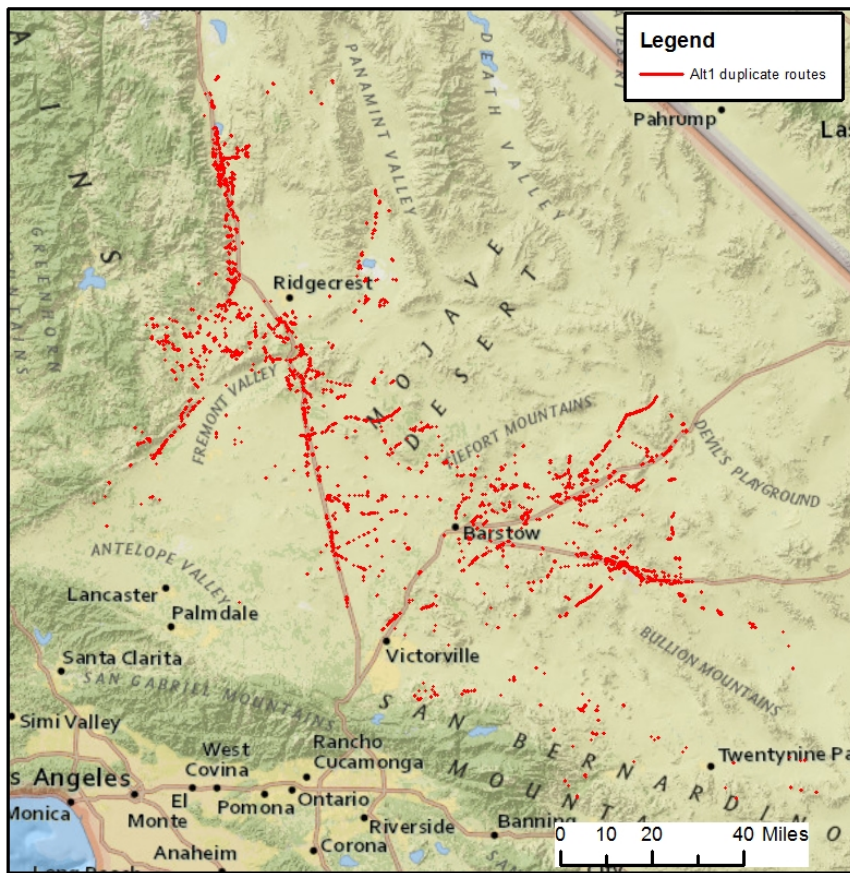


Figure 3. Alternative 2 duplicate routes.

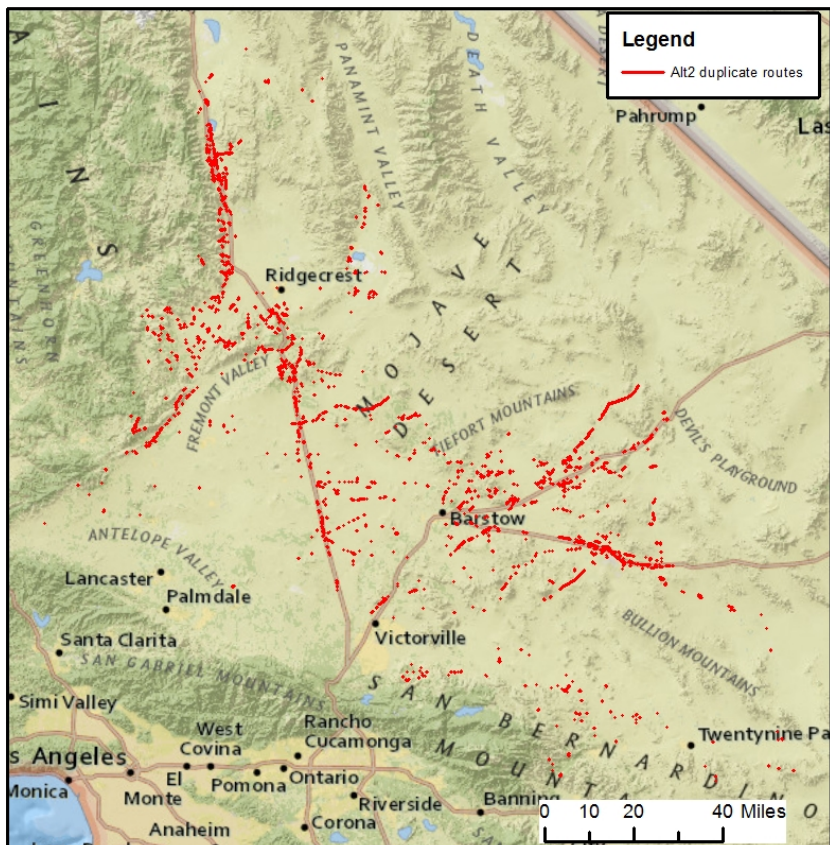




Figure 4. Alternative 3 duplicate routes.

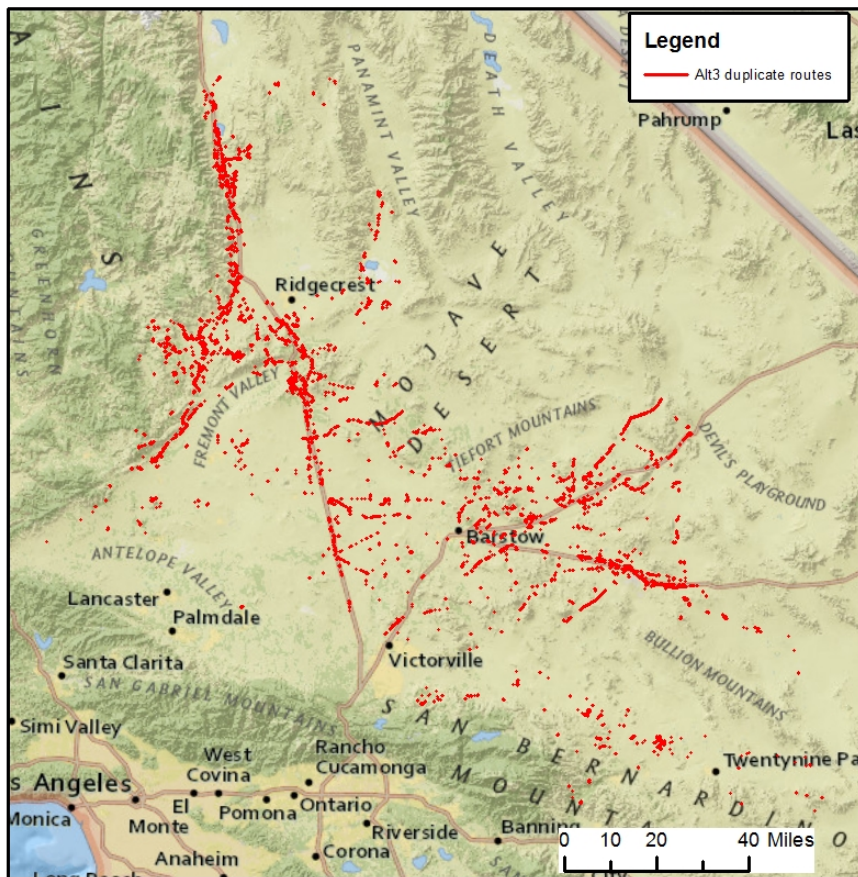


Figure 5. Alternative 4 duplicate routes.

