



January 29, 2009

Project Manager
Attn: Mr. Joseph Ross
MAGTFTC/MCAGCC
Box 788104, Bldg 1554, Rm 138
Twentynine Palms, CA 92278-8104

Re: Notice of Intent to Prepare an Environmental Impact Statement for the Proposed Acquisition of Lands and Establishment of Airspace Contiguous to the Marines Corps Ground Combat Center

Dear Mr. Ross:

These comments are submitted on behalf of the BlueRibbon Coalition (BRC), a national non-profit trail-based recreation group, and are directed to the Notice of Intent (NOI) to Prepare a [Draft] Environmental Impact Statement (DEIS) for the Proposed Acquisition of Lands and Establishment of Airspace Contiguous to the Marines Corps Ground Combat Center (MCAGCC). This document shall not supplant the rights of other BRC agents and organizational or individual members from submitting their own comments and the agency should consider and appropriately respond to all comments received to this NOI.

BRC advocates for good stewardship of public lands and champions continued access to federal and state recreation sites for responsible OHV and multiple-use recreational activities. As you know, the 189,000 acre Johnson Valley OHV Area is used year-round by extreme rock crawlers, ATV riders, dirt-bike enthusiasts, SUV owners, side by side operators, mountain bikers, equestrians, rockhounds, and hunters. It is also home to numerous competitive motorized events that draw literally hundreds of thousands of competitors and spectators to the area.

BRC senior staff and/or members have attended numerous meetings with the BLM, Marine Corps, congressional representatives, recreational groups, and other stakeholders on this issue.

BRC's position at this point is to continue our strong opposition to the entire project including the proposed withdrawal and subsequent planning and to restate said opposition as articulated in the October 2008 OHV Recreation Stakeholder Group's joint position statement (see attached).

BRC believes the loss of this destination recreation area would have a devastating and unacceptable statewide impact on legal OHV recreation.

BRC suggests the following issues be addressed in the DEIS.

The DEIS must study the possibility of the Marines expanding to the east. This option impacts OHV recreationists to the least possible extent. Expansion to the east is supported by every major national, state, and local OHV group. It is also supported by resolutions recently passed by the Town of Yucca Valley and the Town of Apple Valley.

The DEIS must assess the cumulative impact of the loss of OHV area if the marines choose to expand into the Johnson Valley OHV Area. The U.S. Forest Service is implementing their Travel Management Rule and as a result the surrounding local forest areas that might otherwise absorb some of the former Johnson Valley recreation are also seeing large closures of available OHV routes.

The DEIS must assess the increased costs resulting from the loss of the Johnson Valley OHV Area with respect to properly signing limited use areas and implementing an education campaign about where the appropriate remaining riding areas are located. There are approximately 500,000 registered off-highway vehicles in Southern California. Many of these users will look for a new place to ride if Johnson Valley is not available. Many areas that are currently off limits to OHV travel are not properly signed as such. A large amount of money will be needed to purchase and install the proper signage.

The DEIS must assess the increased law enforcement costs to federal, state and local jurisdictions with respect to enforcing trespass on private property and other areas where OHV travel is not allowed. Many OHV recreationists that will be misplaced by the closure of Johnson Valley will look for other areas to recreate in. Until proper signage is in place in federal, state and local areas, law enforcement will need to be increased.

The DEIS must assess the economic impact the loss of the Johnson Valley OHV Area will have on the local community. While a large number of the people that recreate in Johnson Valley do not live there, they do stimulate the local economy with their purchases of gas, groceries, parts and miscellaneous camping supplies.

The DEIS must assess the economic impact the loss of the Johnson Valley OHV Area would have on the larger Southern California region. Many users of this area live in neighboring counties. When these users make large ticket purchases they usually do so in the area where they live. The closure of Johnson Valley would significantly reduce sales of such items as motorcycles, ATVs, UTVs, dune buggies, rock crawlers, motorhomes,

trailers and their associated tow vehicles. The businesses that service and modify these types of vehicles would also be negatively affected.

The DEIS must study where the current 800,000-1,000,000 annual visitors will recreate if Johnson Valley is closed. It has been estimated that Johnson Valley OHV Area hosts between 800,000 and 1,000,000 visitors each year. Where will these users go to recreate if that area is not available in the future?

The DEIS must study the possibility of opening up BLM land that is currently closed to OHV use. This study should look at land use amendments to allow for OHV recreation and competition to occur in areas that are currently off-limits to OHV use.

The DEIS must study the possibility of purchasing privately-owned property to compensate the OHV Community for lost opportunity in Johnson Valley. This study should look not only at areas in San Bernardino County, but the surrounding counties as well.

The DEIS must incorporate a plan that returns the Johnson Valley OHV Area to public use once it has fulfilled its usefulness to the military. In all likelihood the military will not need to train in this manner indefinitely. When no longer needed by the military, the military should be required to clean up the area and return it to public use.

The DEIS must explain in detail the USMC's purpose and need for the proposed expansion of the base. To date, the USMC has been exceedingly vague as to the need for the proposed project, stating only that "past experience" indicates three Marine Expeditionary Brigades must train simultaneously in order for the Marines to prepare properly for war. Given that the proposed withdrawal of public land is unprecedented in size and scope, and in terms of its impacts on the non-military public, the DEIS must provide much more information as to the purpose of the project and why it is essential to military readiness.

The DEIS must evaluate and disclose the cost of the proposed expansion, including the ongoing, perpetual costs of the contemplated training mission. The U.S. Government is operating at a dangerous deficit...one that will only grow in the next few years as the new economic stimulus packages are implemented. Defense spending, apart from being a disproportionately large part of the federal budget, is notoriously wasteful. The DEIS must demonstrate to an apprehensive public that the costs of the proposed project, including those relating to ongoing training, have been accurately predicted and can be covered with existing funds.

The DEIS must explain why the Marines propose to use an outdated model that requires segregated training instead of looking at a 21st Century integrated training model. Desert warfare today is a prime example of battlefield integration between the various branches of the military. In proximity to the existing Marine base are thousands of square miles of lands already reserved for military training. Such areas include Fort Irwin, the Barry Goldwater Bombing Range, and Yuma Proving Grounds.

The DEIS must study the possibility that both the recreationists and the Marines could share the Johnson Valley OHV Area.

CONCLUSION:

Again, BRC's position at this point is to continue our strong opposition to the entire project including the proposed withdrawal and subsequent planning.

However if this project moves forward, the BRC suggests the following 3 alternatives be developed;

1 – Develop an alternative that uses exiting military facilities for integrated training.
This should be the **preferred alternative** since it utilizes existing federal facilities that will save tax monies and allow for continued recreational use of Johnson Valley. It will have the least economic and environmental impact.

2 – Develop an alternative with the MCAGCC using other public lands outside of Johnson Valley.

3 – Develop a Co-Use Alternative so that the area will not be completely removed from the public domain.

BRC thanks your office for this opportunity to comment on the DEIS. I look forward to reviewing the document when it becomes available.

Sincerely,



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Enclosed: Oct. 2008 OHV Coalition Letter

California OHV Recreation Stakeholder Group

October 2008 Position Statement on Johnson Valley Issue

We the undersigned strongly oppose the withdrawal of the Bureau of Land Management, Johnson Valley Off-Highway Vehicle (OHV) Recreation Area by the Marine Corps Air Ground Combat Center, Twenty-nine Palms.

While we respect the need to train our troops, we believe the Marine Corps must clearly demonstrate a need for the expansion of the base. If such expansion is warranted then we support, in general, expansion in an eastward direction from the base.

Eastward expansion presents the least conflict with multiple use of the public lands in the Johnson Valley area, and further, has the least impact on local communities and their residential and economic interests.

We will participate actively in the continuing development of alternatives for the proposed expansion as necessary.

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We will participate actively in the continuing development of alternatives for the proposed expansion as necessary.

Signed,

American Motorcyclist Association, American Motorcyclist Association District 36, American Motorcyclist Association District 37 Competition, American Motorcyclist Association District 37 Dual Sport, American Sand Association, Blue Ribbon Coalition, California Association of Four Wheel Drive Clubs, California Off Road Vehicle Association, California Trail Users Coalition, Friends of Giant Rock, Friends of Johnson Valley, High Desert Multiple Use Coalition, Off Road Business Association, Partnership For Johnson Valley, and San Diego Off-Road Coalition.