



December 15, 2008

*Sent via U.S. Mail and Email*

Roxie Trost  
Field Manager  
Bureau of Land Management  
Barstow Field Office  
Barstow, CA 92311

Re: Notice of Proposed Legislative Withdrawal Application and Segregation of Lands Adjacent to the Marine Corps Air Ground Combat Center, Twentynine Palms, California

Position: **Oppose Withdrawal**

Dear Field Manager Trost:

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 Proposed Legislative Withdrawal Application and Segregation of Lands adjacent to the Marines Corps Ground Combat Center (MCAGCC). The Notice is directed to the 189,000 acre Johnson Valley OHV Area. 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 Notice.

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 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 has also attached a September 24, 2008 letter from Brad Mitzelfelt, First District Supervisor of San Bernardino County. He too raises concerns about the numerous negative impacts of the potential closure of the Johnson Valley OHV Area to public use and raises other access issues as well.

BRC and our members respect and support the need to train our troops in defense of this country. In fact, many of our members are retired or active military. However, that respect should not be interpreted as blind support for what appears to be an ill-conceived project where the Marine Corps has failed to convey a valid reason(s) for its need to expand into all or part of the 189,000 acre Johnson Valley OHV Area.

BRC believes the Marine Corps Purpose and Need has failed to show the withdrawal is necessary at Johnson Valley OHV Area. Again, it has not shown that an expansion of MCAGCC is even needed. At this point, the Marine Corps and BLM appear to be using circular logic where one agency justifies the federal action of the other agency regarding the withdrawal and NEPA planning process. Long-term justification/need for the expansion, withdrawal, and segregated training must be provided before this process continues.

BRC is aware of the historic 20<sup>th</sup> Century-based military operating tenet that each branch of the service must have its own separate training facility. In times past there were vast quantities of federal land available for large military bases. Those lands were either sparsely populated or of little perceived value to the public. However in the 21<sup>st</sup> Century that paradigm is no longer valid.

BRC objects to what appears to be a decision made by the Marine Corps using an outdated model that requires segregated training instead of looking at a 21<sup>st</sup> Century integrated training model. Desert warfare today is a prime example of battlefield integration between the various branches of the military.

In proximity to MCAGCC 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. BRC does not believe the Navy Research Group gave said areas serious consideration.

BRC believes that other military reservations should be explored for use by the Marine Corps before lands at the Johnson Valley OHV Area are recommended for withdrawal.

In conclusion, BRC strongly opposes any effort by the BLM to recommend for withdrawal any portion of the 189,000 acre Johnson Valley OHV Area.

Before this process continues BRC suggests that a diverse stakeholder group be convened to work in a collaborative fashion with the agency and the Marine Corps to research and analyze any and all options including use of other military reservations or expansion eastward.

BRC thanks the agency for allowing the public the opportunity to comment on this all too important topic.

Sincerely,

A handwritten signature in black ink, appearing to read 'Don', with a long horizontal flourish extending to the right.

Don Amador  
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Oakley, CA 94561  
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Attachments:

October 2008 OHV Recreation Group Position Statement

September 24, 2008 Brad Mitzelfelt San Bernardino County  
Supervisor Letter