



San Joaquin Valley Resource Conservation & Development Council

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East Merced RCD

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Tulare County RCD
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Community Services &
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King's County Economic
Development Corporation

San Joaquin Valley Leadership Forum

Self-Help Enterprises

February 22, 2010

Bureau of Land Management
Attn: CCMA RMP/EIS
20 Hamilton Court
Hollister, CA 95023

Dear Sir:

The San Joaquin Valley Resource Conservation and Development Council promotes the wise use of natural resources throughout the seven county area from Stanislaus County to Kern County. We support conservation practices that prevent soil erosion, minimize sediment loads in streams and rivers, keep our air clean, and foster low carbon food production. The Bureau of Land Management proposals that would increase off-road vehicle use in the Coastal Range of western Fresno County would increase soil erosion, flood damage, air pollution, and the carbon footprint of local meat production.

Given the fragility of the soils in the upper Los Gatos Canyon watershed, the construction and use of new dirt roads in the upper Los Gatos Canyon watershed would cause a huge increase in soil erosion and sediment loads in Los Gatos Creek. You may recall that it was Los Gatos Creek along with the other streams of Arroyo Pasajero that tore out the bridge on Interstate 5 in 1995, resulting in five deaths. This is precisely the kind of environmental degradation and public safety hazard our Council seeks to prevent.

With regard to air quality, the dust stirred by off-road vehicles, the fine particulate matter emitted by their engines and the emissions of oxides of nitrogen from their engines are all harmful to human health. One in six school children in the San Joaquin Valley has asthma exacerbated by bad air quality. Bad air quality in the San Joaquin Valley also shortens the lives of 1,200 elderly people annually. To knowingly increase fugitive dust, PM 2.5 engine emissions, and oxides of nitrogen by establishing new ORV roads and campground facilities for new and renewed off-road vehicle use in the Coastal Range amounts to a willful disregard of the resulting respiratory illness among our most vulnerable Valley residents.

San Joaquin Valley Resource Conservation & Development Area Council
5588 N. Palm Ave., Ste. H, Fresno, CA 93727 (559) 252-2191 ext. 112

The San Joaquin Valley RC&D Council also opposes a reduction of grass-fed beef production to accommodate recreational uses of Bureau of Land Management properties in the upper Clear Creek watershed. Range fed beef is the low carbon sector of our domestic beef production in the United States. Reducing natural forage-based meat production causes cattle to be fed longer in feedlots where carbon-intensive feeds and ration preparation raise the carbon footprint of the beef, an undesirable alternative in our twenty-first century, carbon-restricted economy.

For the above reasons, the San Joaquin Valley RC&D Council opposes any new or renewed use of off-road vehicles in the Clear Creek Management Area. Of the seven alternatives set out in the Clear Creek Management Area Draft Resource Management Plan and Draft Environmental Impact Statement, Alternative G comes the closest to restricting ORV use sufficiently. Alternative G, however, restricts grazing in the CMMA, while Alternative F authorizes reduced grazing use. Any off-road vehicle activity would cause increased sediment in area streams, larger flood flows, more respiratory illness, and a bigger carbon footprint in San Joaquin Valley meat production than if ORV use were banned altogether. The San Joaquin Valley Resource Conservation and Development Council supports the complete closure of the Clear Creek Management Area to off-road vehicle use and encourages continued livestock grazing.

Yours truly,



Philip Erro, President