

Salinas Ramblers Motorcycle Club

P. O. Box 541, Salinas, CA 93902-0541

U.S. POSTAGE
HOLLISTER, CALIFORNIA 95023
10 MAR - 8 PM 2:55

March 5, 2010

Rick Cooper
Field Office Manager
Hollister Field Office
20 Hamilton Court
Hollister, CA 95023

Dear Rick,

Please find attached our comments regarding the CLEAR CREEK MANAGEMENT AREA RESOURCE MANAGEMENT PLAN & ENVIRONMENTAL IMPACT STATEMENT dated November 2009.

Please direct any questions about these comments to our e-mail address: srmc@salinasramblersmc.org or to our mailing address listed above.

Sincerely,



Matt Beck
President

General comments: Members of the Salinas Ramblers Motorcycle Club (SRMC) have been recreating at Clear Creek for over 60 years. According to Frank Rodgers of Salinas, his grandfather and other motorcyclist started to frequent the New Idria area starting around 1946. Their activities were mostly relegated to the road system in the CCMA because of the types of bike available at the time – larger, twin cylinder, Harley Davidson and Indian road models.

It wasn't until the mid-1950s when lighter weight, single cylinder British motorcycles were imported in quantity did the use expand beyond the road system. Bob Day, 76 of Salinas, recalls that he laid out poker runs from Larry Ketzell's Salinas motorcycle shop starting in 1958 and the runs would go through Clear Creek and New Idria before returning to Salinas. These runs introduced many riders to the CCMA and more and more riders started to frequent the area, exploring the hundreds of miles of roads left behind by the mining industry.

OHV use in the CCMA grew tremendously in the late 1960's and early 1970's when modern off-road motorcycles arrived in the United States from Japan and Europe.

Brands such as Suzuki, Yamaha, Honda, CZ, Maico and Husqvarna produced "enduro" style bikes that allowed members to better climb the barren hills and explore the area. In 1972, Bob Day and Frank's Dad, Richard Rodgers, laid out the first enduro that was run in Clear Creek. A dirt-oriented club from Salinas by the name of Salinas Dirt Riders hosted it in January of 1973. This club shared many members in common with the SRMC. The clubs merged in 1976 and the SRMC took over organization and sponsorship of the Quicksilver Enduro for the next 31 years. From 1984 until 2007 the Quicksilver was a national enduro, and rated as one of the toughest events in the country.

Members of the SRMC made many trails in Clear Creek while the area was managed for open use, as did the Mountaineers MC, Timekeepers MC and the Merced Dirt Riders. Efforts of these clubs led to the development of a world class OHV recreation area and the CCMA was recognized as one of the best places in the United States to ride by Dirt Rider Magazine in their March 2002 edition.

From our camping and staging area adjacent to the CCMA, the SRMC members have enjoyed OHV recreation with family and friends for over 50 years. Multiple generations of Ramblers have grown up riding together at the Creek.

Pictured below are three generations of a SRMC family. Frank Rodgers, a founding member of the Club on the left on a CZ, his son Richard (Dick) on a Suzuki and to the right Dick's sons.

Frank Sr. passed away a few years ago at age 89. Dick Rodgers is a life member of the Salinas Ramblers and his son Frank is an active member.

This photo was taken at the Indian Hill Staging area in 1973. Dick Rodgers owned the Suzuki shop in Salinas for many years.



The tradition of families recreating together continues today and is a fundamental part of Club life. The Club at least once a year hosts a club run to a destination in the CCMA. Parent pack up the small kids in side by sides and the rest of the family rides together on quads, mini-bikes or dirtbikes.



The histories of the SRMC and of Clear Creek are tightly intertwined and the closure you thrust upon the SRMC and our fellow OHV users is a very painful blow that we believe is without justification. While we are a small organization, we are part of the AMA, District 36 and BlueRibbon Coalition. These organizations have thousands of members who have used Clear Creek over the years and when we hold events we get to talk with many of them. Had there been anyone suffering from an asbestos disease in the OHV community we would know about it, the whole OHV community would know about it! The fact is there isn't.

It is time to reopen Clear Creek to recreation and public use. We will sign waivers in conjunction with season or weekly passes if that is what it takes.

Land Tenure: The SRMC supports the disposal of the parcel of the CCMA that sits between our two parcels. We believe that the disposal will benefit both our organizations as it will eliminate a part of CCMA that is not accessible by the general public and it will relieve the BLM of having to permit our events and manage this small parcel that provides no public benefit.

Vehicle washing facility: We strongly recommend that the BLM build a wash rack for public use. We put together a water system on our property and members of the Club regularly wash our vehicles before returning home especially when it is really muddy during the winter. We believe the general public will do the same provided that multiple lanes/stations are available and the process is easy and fast, i.e. high-pressure spray that also uses less water than a hose.

Special Recreation Permits: We were discouraged to learn that the BLM proposes to no longer issue special recreation permits for events inside the hazardous asbestos zone. The SRMC stopped running an enduro event in Clear Creek because the AMA decided not to have the SRMC run a national enduro in 2008. Several members of the SRMC have expressed the desire to put on an enduro again once the area is reopened.

For years the Club conducted air sampling for the BLM before and during our enduros and never once was an air sample found to exceed the OSHA safe limit and often the samples were well below the limit. This is likely due to our luck with the weather that always seems to give us wet conditions in February when we traditionally run our enduro.

We do not understand why the BLM has taken this position and request the BLM to remove this onerous proposed action from the EIS.

Trails: Most of our members recreate on trails and the majority of the trails we use are situated to the north and east of our property. Most members avoid the Clear Creek canyon area where the EPA study was done because there is more chance of a head-on since you shut down so many trails in 2006. Also this area tends to be drier and dustier than the rest of Clear Creek. Perhaps you have noticed that we put the majority of our wet weather course for the enduro in this area because of the lower elevations and the warmer temperatures in the winter.

When you reopen Clear Creek we need to work together to reopen routes that were closed prejudicially by members of your staff who hated OHVs. Many of these routes have been used for decades and we

don't understand the reason to close routes, especially single-track trails that are the most favored to ride because of the more limited opportunity for a head-on accident.

Socio-economic: The closure of Clear Creek has had a big impact on local OHV businesses because many of these businesses' customers recreated in Clear Creek. As an example, Pinit Motorsports, operated by member Steve Polk, has seen his business drop by about 33% since the closure. A portion of this decline is due to the local economy but a large part is due to the Clear Creek closure. His unit-sales of dirt bikes is down 63% compared to 2007/2008 before the closure and sales of knobby tires and dirt accessories are likewise down dramatically. What has kept him in business was taking on the Yamaha line and selling street bike and equipment.

There has also been a noticeable drop in participation in Club activities since the closure. Clear Creek is one of the ties that bind the Salinas Ramblers together but now that tie is broken and the impact is noticeable. The BLM has not explored this facet of the social impact of the closure and what the side effects might be. There is a general mood in the OHV community that if agencies like the BLM continue to close riding areas, then use will start to migrate to places like Fort Ord, Panoche and other areas that the BLM would not want to see it happen in.

Risk to Children: As mentioned above, family recreation is part of what the Ramblers do. Many members have commented that the EPA study did not model the way parents recreate with their children. Rarely will you see a parent riding in front of their child, especially early in the child's riding career. Most parents are very protective and will ride behind their child or children so they can pick them up if they fall and to observe how they ride so they can teach them how to ride correctly.

The EPA study took air samples simulating children riding behind their parents but this isn't the real world. During their childhood years it is more likely that they would be a lead rider and not a trailing rider and thus their exposure would be less than the EPA determined in their study. Plus we teach our children not to ride in clouds of dust!

EPA Report: Members of the SRMC participated in the first scientific study conducted back in the late 1970's. You may not remember but 1976 and 1977 were drought years in California (http://www.water.ca.gov/drought/docs/Drought_Rpt_Chp1.pdf) and as a result the air samples that SRMC members collected were from a very dry period in California history. Back then, as today, we knew not to ride in the dust because it contained asbestos. We also know to stay off of Clear Creek roads because only bad things happen there – like head-on accidents.

It is a mystery to us why the EPA would conduct air sampling and tell their test riders to ride in dust clouds on Clear Creek road. People don't recreate like that! This just goes to show what happens when you get a bunch of academics out of their San Francisco offices. They don't have a clue how people recreate.

Since the EPA performed the study for the BLM, why did you allow the testing to be done like this? Why did the EPA take so many samples in September when you had already closed it during the summer? Why did you include the air samples from the dry season in the risk analysis? Why didn't

you have the ranger, William, more involved in the testing and how it was run? He knew more about Clear Creek than all the people in the Hollister office put together.

Also, why are you ignoring all the scientific data that the BlueRibbon Coalition and their scientific consultant, Dr Ilgren, have provided to the BLM?

What you ended up with is a screwed up report that dramatically over-estimates our risk of recreating in Clear Creek. The BLM can't move forward with the risk information from this EPA report so you need to stop this EIS process and do another study. You also need to reopen Clear Creek because there is little risk especially during the rainy month from October through May. We understand that even your employee testing in 2007 and 2008 supports this.

If you do move forward with this screwed up risk data then there is only one alternative that is acceptable to the Salinas Ramblers and that is alternative A.