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Response to CCMA Draft EIS 2009

Alternate D is not compliance with CEQ (Council on Environmental Quality) regulation 1502.14 (b) which states, "Devote substantial treatment to each alternative considered..."

Alternate D emphasizes vehicle access for non-motorized recreation opportunities inside the ACEC and new OHV recreation opportunities outside of the ACEC.

The description of alternate D fails in the following ways.

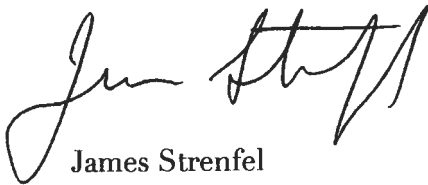
- 1. Omits any information, maps, or coordinates clearly indicating the trail system proposed. The map for alt. D only shows the general location and not any specific details of trail locations, road locations or visitor recreation facility locations.*
- 2. Omission of any time frame for construction of trails and visitor recreation amenities.*
- 3. Omits any costs associated with trail construction and visitor amenities construction.*
- 4. Conflicting statements in the EIS. Page 547 under Land Disposal, Acquisition and Exchanges reads "Under Alternative D, none of the 3,300 Acres in the Tucker, Condon and San Benito River zones would be available for disposal. Retention of these lands would have minor adverse impacts on management efficiency and public access because all of these parcels have no existing (or reasonably foreseeable) public access." Yet page 19 in the EIS under Alternative D reads "Emphasis would be on developing OHV recreation opportunities on public lands near Tucker Mt., Condon Peak, or San Carlos Bolsa (Cantua Zone), where appropriate.*
- 5. Failure to describe what is "appropriate" in the above statement.*

6. *Failure to adequately discuss thoroughly what environmental consequences would occur with construction of trails, roads and campgrounds.*

Recommended action

The BLM needs to put "boots on the ground" in the proposed new OHV areas. Construct a coherent trail system plan and publish a proposed trail map. The BLM needs to inventory the areas for suitable parking, camping, staging areas and associated development needed to implement alt. D. These also need to be included in the associated map. All environmental impacts related to implementation of the alternate need to be addressed and brought to light. Costs to implement alt. D need to be calculated and presented for public scrutiny. The conflicting statement (above #4) needs to be resolved. A time frame for start, construction and completion of alt. D needs to be published. Only then can alternate D be considered a viable choice and in compliance.

Sincerely yours,



James Strenfel