



DESERT TORTOISE COUNCIL

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1 June 2013

Congressman Paul Cook
14955 Dale Evans Parkway
Apple Valley, CA 92307

RE: Shared use of Johnson Valley by Marine Corps and off-highway vehicle recreationists

Dear Congressman Cook,

The Desert Tortoise Council is a private, non-profit organization comprised of hundreds of professionals and laypersons who share a common concern for wild desert tortoises and a commitment to advancing the public's understanding of this species. Established in 1976 to promote conservation of tortoises in the deserts of the southwestern United States and Mexico, the Council regularly provides information to individuals, organizations and regulatory agencies on matters potentially affecting the desert tortoise within its historical range. Our members come from all four states occupied by the desert tortoise and hence we represent people from your district.

We are addressing the issue surrounding the expansion of uses of the large-scale Marine Air Ground Task Force (MAGTF) training facility adjacent to the existing Marine Corps Air Ground Combat Center (MCAGCC) at Twentynine Palms, San Bernardino County, California and the Johnson Valley Off-Highway Vehicle Management Area (Johnson Valley OHVMA).

We understand that a Record of Decision (ROD) was issued in February 2013 by the Department of the Navy to establish a large-scale MAGTF training facility adjacent to the existing MCAGCC at Twentynine Palms, San Bernardino County, California. We are not opposing the US military using land to pursue their mission as long as that use is designed with appropriate conservation in mind.

We also understand that your office is advocating shared use of portions of the expansion area, particularly in Johnson Valley, for recreational off-highway vehicle (OHV) users by identifying and managing those areas as the "Johnson Valley National OHV Recreational Area." We are very concerned that expansion of OHV use lands will negatively impact the desert tortoise on the designated lands and on adjacent lands.

The Johnson Valley Off-Highway Vehicle Management Area (Johnson Valley OHVMA) has been an approved location and dedicated for "open" off-road or OHV use since the Interim Critical Management Plan was issued by the BLM in 1973 and, although it historically contained tortoises, it has been severely disturbed over the course of 40 years of heavy use as has much of the MCAGCC. To avoid a massive increase of that type of disturbance we strongly support the retention of the Johnson Valley Open Area or "Recreation Vehicle Management Area" as currently designated, without expansion.

We are extremely concerned with the problem of spill over of OHV impacts beyond the Johnson Valley OHVMA into critical habitat. This is a common problem as it also occurs at El Mirage, Spangler Hills, and Stoddard Valley OHVMAs. Controls (e.g., rangers chasing violating motorcycles) have not worked, nor have signings. Our best recommendation is for installation of physical barriers sufficient to protect critical habitat. The BLM biologist in the Barstow office recently sent out maps of spillover areas, asking for help in designing a monitoring system. They are aware of the importance of fixing the problem and we support their efforts.

Our primary recommendation is to support the boundaries of the Johnson Valley OHVMA as currently shown and to take the recommended actions on the ground to contain use and disturbances within the boundaries and to prevent spill over into critical tortoise habitat.

In support of this recommendation, we provide you with a scholarly and comprehensive approach to designating routes, "A View from the Road: Route Designation in the Western Mojave Desert." The authors are among the most knowledgeable people with regards to vehicle impacts, route designations, and implementation. We and four other non-governmental organizations requisitioned this study in 2012, so it is current and relevant to foreseeable vehicle management on designated routes.

We also ask you to take a great opportunity now to support the land managers, particularly the BLM, in protecting our desert resources for future generations and in elevating public awareness of the importance of the desert tortoise. One of the best ways to do this is to ensure that routes are clearly designated as open or closed throughout the range of the listed Agassiz's desert tortoise, located north and west of the Colorado River, and to close those routes that are not designated as "open." In effect, this helps mitigate the expansion and continuing recreational uses by promoting meaningful route designation in adjacent areas and throughout those portions of the tortoise's range being affected by this project.

We thank you for your attention.

Sincerely,



Desert Tortoise Council
Edward L. LaRue, Jr.
Ecosystems Advisory Committee