

Ben Burr, Executive Director

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September 12, 2025

Naval Facilities Engineering Systems Command Southwest
Attention: Mr. Ryan Maynard, PSUA EA Project Manager
750 Pacific Highway, Floor 12
San Diego, CA 92132-0058

We, the undersigned groups and organizations representing hundreds of thousands of users across California and the nation, have worked for more than a decade to preserve Johnson Valley as a premier destination for motorized recreation and events, and we remain actively engaged in any policy changes that could affect recreation in the Johnson Valley Shared Use Area. Our community and partners were deeply involved in the original NEPA process that led to the 2013 designation of the Shared Use Area, and our members have consistently participated in meetings, comment periods, and on-the-ground stewardship to ensure that this nationally significant OHV area remains open and responsibly managed. Given this long record of engagement, we are committed to providing substantive input on the current proposal to change airspace regulations over this area, and it is critical that adequate time and process be provided for all interested parties to fully evaluate the impacts. For these reasons, we formally request a 90-day extension of the comment period regarding the U.S. Marine Corps' proposal that threatens access to Johnson Valley OHV Area.

Given the size, complexity, and public importance of this proposal, we believe an extension is necessary to ensure the public has adequate time to analyze the impacts and provide meaningful input. The Johnson Valley area is one of the most heavily used OHV recreation areas in the nation, hosting world-renowned events such as King of the Hammers, and providing year-round opportunities for families, enthusiasts, and local businesses that depend on recreation access. A 90-day comment period is the minimum required for stakeholders to fully evaluate the consequences of the proposal.

In addition to an extension, BRC strongly urges the agency to prepare a full Environmental Impact Statement (EIS) instead of an Environmental Assessment (EA). The proposal has significant implications for recreation, local economies, cultural resources, military readiness, and the integrity of long-standing access agreements. Under NEPA, the intensity and context of these potential impacts warrant the highest level of environmental review to ensure that all reasonable alternatives are considered and that decision-making is fully informed.

Finally, BRC requests the establishment of a formal liaison between the USMC, the FAA, and OHV recreation groups. Johnson Valley represents a unique model of shared use between the military and the public.

Continued access and responsible management depend on open communication. A liaison would improve transparency, ensure that user groups have a consistent point of contact, and help resolve conflicts before they escalate. We are convened as a coalition of organizations that broadly represent the OHV community in Johnson Valley, and we have the resources and expertise to be an effective cooperating stakeholder in development of this policy.

We respectfully ask that you:

1. Grant a 90-day extension for the comment period.
2. Commit to preparing a full Environmental Impact Statement.
3. Establish a liaison between the military and our coalition of OHV recreation groups.

These steps are critical to maintaining public trust, protecting recreation opportunities, and ensuring compliance with NEPA.

We would like to be considered an interested public for this project. Information can be sent to the following address and email address:

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Sincerely,

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