

## LUCERNE VALLEY ECONOMIC DEVELOPMENT ASSOCIATION (LVEDA)

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RE: COMMENTS ON THE FINAL EIS - 29 PALMS – TRAINING LAND  
ACQUISITION/AIRSPACE ESTABLISHMENT (MCAGCC)

Responses to LVEDA's comments on the Draft EIS lack the substance required by NEPA – especially dealing with socio-economics where we provided specific measures.

West vs. East: The significant reduction of impacts and mitigation costs associated with the eastern alternative were glossed over in the rationale to select the more divisive and disrupting western expansion (Alt. 6). We continue to strongly advocate the eastern alternative.

OHV Displacement: The rationale re: the availability of “open routes” in the West Mojave for OHV use outside BLM “open areas” needs re-assessment due to likely closures stemming from the current route designation process prompted by West Mojave Plan litigation. It is likely that fewer routes will be available – “open and closed” routes receiving heavier use – more private land trespass – etc. – already occurring in the adjacent Ord Mt. DWMA (ACEC). DOD must provide funding for BLM enforcement – for Rangers in the field.

ORD MT. Grazing Allotment: There is no mention of compensation for the loss of 7.4% of the allotment and its associated AUMs – even though the impact is considered “cumulatively significant”.

Morris Lode Mine: Just because it isn't currently active is no reason to discount its importance to the local cement industry. The analysis provides no quantitative data that “mill scale” waste would provide a viable substitute for the loss of this local and critical source of iron ore. There is no reason why DOD can't devise a plan to allow this and other potentially active mines to operate. The “cumulative impact” analysis must include not only the longer transport to and from alternative iron sources – but the current impacts of AB 32 and other requirements being imposed on California's cement industry – with only a straw or two needed to “break the camel's back”..

Socio-Economics: The complex and supposedly state-of-the-art economic impact model – “Economic Impact Forecasting System” – certainly didn’t result in any in-depth analysis or understanding of local economic losses – basically only a statement that our Lucerne Valley businesses can expect a 2.5% revenue/profit loss and small ones could fail – with a cursory end to the discussion – “not a significant impact and no mitigation” – and with no acknowledgement of our proposal to direct more OHV-related traffic through our commercial district in order to attract more trade. The “beneficial County-wide net gain” argument re: increased employment, sales, etc. from expanded military and civilian forces might apply in the 29 Palms/Joshua Tree region – but definitely not for Lucerne and Johnson Valleys that will pay the price and consequences of OHV visitation and filming losses. Reliance on SB 2921 to “offset some of the more localized sales/revenue impacts on local businesses and communities” (p.5-23) - not only assumes its future enactment – in no way will it benefit our region. DOD must address local economic impacts with substantive solutions – not just gloss over it with an apple/orange/specious argument that it all evens out. It doesn’t. That is the lamest economic analysis we have seen in any EIS to date.

Shared Use: The Final EIS must include a “worst case” analysis of Alt. 6’s “shared use” potentially transitioning to DOD’s “exclusive use” if and when “trespass” during military use or some accident occurs in said “shared use” area. BLM must retain jurisdiction with a R/W or permit – not just hand it over to DOD - in order to provide assurance that “shared use” is set in concrete.

Noise: Figure 4.9-19 attempts to model the complaint possibilities from ordinance usage and shows which areas will most likely be affected by a level of noise that would be felt as well as heard. However, the model stops at noise levels of 115 to 130 db’s, which is double that of the maximum allowed by local ordinances (laws) to when such noise levels should be mitigated to some extent. The FEIS seems to be lacking in the depth that the study should be done to show just what the ordinance noise levels as well as vibration measures in inches per second would be at the populated areas of Lucerne Valley. Right now, the residents of Lucerne Valley can hear the ordinance booming sounds and in some areas actually feel strong vibrations from the existing base activities not to mention how this affects closer communities like Johnson Valley, Landers, etc. The expansion area of preferred alternate 6 will just exacerbate these sounds and vibrations on the people that have already lived with this for years. The figures don’t extend far enough beyond the proposed expansion areas. This issue is the one issue that is of concern by the majority of residents of Lucerne Valley and the FEIS does not do an adequate job of explaining the affect on the community.