

DOCKET

09-RENEW EO-1

DATE Nov. 23 2011

RECD. Nov. 28 2011

TO:
California Energy Commission
Dockets Unit, MS-4
Re Docket No. 09-Renew EO-01
1516 Ninth Street
Sacramento, CA 95814-5512
docket@energy.state.ca.us
Re: DRECP Scoping Comments
Docket No.09-Renew EO-01

From: Mojave Trails Group
savecaliforniasdeserts@gmail.com
11-23-2011

David Beaumont

Comments on *the Draft DRECP Preliminary Conservation Strategy*, dated October 26th, 2011

In general, as a commentary to this entire process, we would like to take this opportunity to state a known fact, and put that fact into an appropriate light regarding the use of the DRECP Plan Area for that use which has been labeled as "Recreation". It is understood, and accepted by all parties who buy into the DRECP process, that damage will occur to the Plan Area ecosystems through implementation of this renewable energy program.

Federal land management laws specifically state that these lands under consideration can be used for renewable energy development, those same Federal laws also clearly state that Recreation is an allowed activity on these same lands.

The PCS, is one step in a larger effort to manage the ecosystem damage which will occur due to the construction of the desired renewable energy facilities. It is not, nor should it be, developed as a tool to prohibit such renewable energy effort. It is in our minds, an exercise in learning how to manage the impacts of a legally allowable use of our public lands.

With that in mind, we would like to ask that the wide variety of Recreation which takes place inside of the Plan Area be afforded the same opportunities as renewable energy. As we learn, through processes such as this, we ask that the same learning experience which will be applied to renewable energy facilities in order to allow their construction inside of a sensitive ecosystem, be granted and applied to current and future Recreational activities of all types inside the Plan Area.

In short, we ask that the effects of our activities be managed, rather than simply eliminated or severely restricted, and that they be put in a place of importance as high as any other legal use of our public lands.

Comments on Specific Points of the Document:

1) We would like to point out that Recreation is a legally protected activity on Multiple Use lands under FLPMA.

2) While the PCS maps depict designated off-highway vehicles lands (OHV) and state vehicle recreation areas (SVRA), which is appreciated, we find that there is no depiction of designated motorized route systems which have been developed by the Bureau of Land Management (BLM) under the Northern and Eastern Mojave Plan (NEMO), Western Mojave Plan (WEMO), and Northern and Eastern Colorado Desert Coordinated Management Plan (NECO).

To reflect the personal experience and preference of members of our group, we need to indicate that there are perhaps many people who visit the Plan Area utilizing motorized vehicles for transportation who do not take advantage of the type of recreation which is afforded by the designated OHV and SVRA areas. Instead, their preference is to utilize the route systems mentioned in the three BLM plans above.

It is our position that each type of motorized recreation is equally important and both types should be reflected on the PCS map.

Also, for planning purposes for all aspects of the DRECP, these routes systems should be shown.

The data for these route systems should be readily available from the BLM.

3) Other than on lands purchased for mitigation purposes from willing sellers as part of the DRECP process, the DRECP should not be utilized to cover private lands inside the Plan Area under a conservation effort. While the details of doing so are not specific at this time, it sounds as if the conservation element of the DRECP are asking for what could be something like a conservation easement. Typically, such easements are voluntary on the part of the private property owners, and are something which the private property owners are financially compensated for. To stress the point, these are agreements which are made through a voluntary process between conservation groups and the private land owners, rather than being mandated by law.

While not knowing the full scope of the intention of the conservation element of the DRECP in regards to the establishment of conservation plans over private property, we would also feel compelled to add that should a purchased easement be their intention, that funds derived from the renewable energy developers, or from any type of taxes or government agency fees, not be utilized for this purpose.

4) We would like to ask that the BLM route systems mentioned in item 2 above, and the DRECP RESAs, be included as selectable layers on the online mapping program which is part of the Solar PEIS Program. This would help all parties involved to better understand the impacts to public recreation and access to our public lands.

END

MOJAVE TRAILS GROUP PCS 1 NOV 2011