



GEAR GRINDERS 4WD CLUB, INC.
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California Energy Commission

DOCKETED

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California Energy Commission
Dockets Office, MS-4
Docket No. 09-RENEW EO-01
1516 Ninth Street
Sacramento, CA 95814-5512
docket@energy.ca.gov

RE: DRECPNEPA/CEQA

To the Renewable Energy Action Team,

The Gear Grinders 4WD Club, Inc. represents 38 member families who utilized the California Desert Conservation Area (CDCA) for family recreation. Our concerns are going to revolve mainly around continued recreation on these desert lands addressed by the Desert Renewable Energy Conservation Plan.

Before addressing the issues that pertain to us, we would like to address the fact that this massive document should have more time to be studied. We would like to request that the comment period be extended to after the release of the WEMO Draft Plan. The comment period could coincide with the ending of the WEMO Draft Plans comment period.

1. We noticed that the long established Land Use Designations of the California Desert Conservation Area Plan of 1980 (CDCA) have disappeared in this DRECP Draft document. These land designations have stood the test of time and are well recognized throughout the recreational community. We believe that after 35 years the following land designations should remain:
 - a. Multiple-Use Class L (Limited Use)
 - b. Multiple-Use Class M (Moderate Use)
 - c. Multiple-Use Class I (Intensive Use)
2. Several members in the Gear Grinders have been involved with land use issues since 1976 or for the last 15-20 years or so. Our concerns lie with the blanket Areas of Environmental Concern (ACEC) over the entire desert. We realize that the ACEC designation is an attempt to designate land not suitable for renewable energy; however, an ACEC is very restrictive and does not always allow uses that have been in existence for many years. Case in point is the 29-year event, Panamint Valley Days, put on by the California Association of 4WD Clubs. This is a permitted, non-competitive event. The routes used for runs are on existing roads and trails. Unless this event is grandfathered into the DRECP, this event would not be allowed in an

Page 2, Gear Grinders 4WD Club, Inc. DRECP comments

ACEC. What other CA4WDC events out there would this affect? High Desert Round-Up, for one along with many others. The granddaddy of the all, the Tierra del Sol Desert Safari now in it's 53rd year. Other events would also be affected. Would there no longer be competitive events allowed, i.e., off-road, 4WD, or motorcycle events (off road racing), even though they are in an open area? What about equestrian events such as the endurance rides? Even though horses are an accepted mode of transportation, even in a wilderness area, a competitive endurance ride would not be compatible in an ACEC.

3. In the Panamint Mountains/Lake area, the removal of routes in some riparian areas, including Pleasant Canyon, has been suggested. This trail is in our back yard and one of our favorites because of its lush vegetation and the primitive, historical significance of the trail. The alternative is a dozer-maintained graded road on top of a ridge, that will be impassable when wet and has little scenic value. We don't want to lose this trail, the only remaining canyon trail that has not already been closed. We would also like to remind you that "this is not a route closure plan"!
4. Visitor access to some OHV Open Areas, i.e., Razor via Razor Road and the Dumont Dunes, require the use of BLM designated routes. Although SRMA's are proposed to overlap OHV Open Areas in order to exclude them from renewable energy development, the access roads themselves, to these open areas are not included. Access to these Special Recreation Management Areas must be expanded in the SRMA's for continued OHV access.
5. There are so many layers over the desert, between NLCS areas, ACEC's, SRMA's, and ERMA's, which land use classification takes precedent?
6. Continued mining and mining exploration can only be authorized and regulated by the BLM as per the 1872 National Mineral and Mining Policy Act. We feel any mention of mining in the DRECP should be removed.

Thank you for your time considering these Gear Grinders 4WD Club's comments.

Sincerely,

Jack Brown

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