

Public Lands Roundtable of Ridgecrest

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



Re: Draft DRECP and EIR/EIS

The Public Lands Roundtable of Ridgecrest is comprised of area residents and other interests that place importance on the public lands managed by the BLM Ridgecrest Field Office. The Roundtable meets monthly with representatives of the BLM in an open setting to share information on issues and efforts of the Ridgecrest Field Office.

The Desert Renewable Energy Conservation Plan has been a priority topic of discussion at Roundtable meetings since long before the release of the Draft EIR/EIS. Several of our members participated in scoping meetings and supplied comment at various intervals in the process.

At a special meeting of the Roundtable held on February 10, 2015, ten seasoned members representing a wide range of viewpoints – conservation, mining, recreation, local government, and multiple use advocates, all achieved consensus on the comments offered below for the DRECP Draft EIR/EIS.

Unfortunately, our meeting ran short of time, and some of the Roundtable's most informed members were not able to attend. Had we had a longer comment period, I believe we could have supplied additional consensus comments, and from an even broader range of voices.

Nonetheless, I couldn't be more proud to offer this work product from a civic organization that sets the bar for collaborative and inclusive participation in the management of our public lands.

A. Process Issues:

1) Extension of Comment Period

Due to the overwhelming length and complexity of the DRECP's Draft EIS/EIR, we are just now gaining an solid understanding and appreciation of all that the plan proposes to do. Unfortunately, we are finding that there is too little time left for us to

develop substantive comments on all that we have learned. Therefore, we request a second extension of the public comment period for an additional 90 days, or 60 days after the release of the WEMO route designation Draft EIS, whichever is longer.

2) Notice of Availability

The DRECP's Notice of Availability is substantively defective in that it did not make it clear that it would be entirely replacing the Multiple Use Classifications that have been at the core of the California Desert Plan since 1980.

3) Public Meetings

a) The scoping hearings and public meetings for the DRECP Draft EIS/ EIR were poorly noticed within the media outlets of the local communities in which the hearings were held.

b) Stakeholder Committee meetings were also poorly noticed and were held well outside the DRECP planning area. This made it difficult or impossible for residents of affected communities to participate and comment early on in the process.

c) More formal hearings should have been scheduled for midway through the public comment period. The public meetings that were held upon the release of the Draft EIS/ EIR were too soon for the public to have developed meaningful questions on the proposed plan.

B. Document issues – General:

1) Conservation Management Actions

The Conservation Management Actions (CMA's) for some BLM Worksheets (Appendix L) appear to exceed BLM's authority in regulating hunting.

2) Extended Recreation Management Areas

Extended Recreation Management Areas (ERMA's) appear only in the Preferred Alternative. ERMA's should have been included in more than one alternative in order to provide the public with a wide range of alternatives as required under NEPA.

3) Length and Complexity

The DRECP Draft EIS/EIR document is simply too long and too complex for members of the public to fully understand the proposal. This is clearly evident by the degree of misperception exhibited by many stakeholders, local elected representatives, and members of the general public.

The length of the public comment period was too short to meet the public need, and the document too limited in its distribution. We also received reports of faulty CD-R's which thwarted some people's attempts to review the document.

4) Distributed Generation Alternative

The Draft EIS/EIR should have analyzed and carried forward the Distributed Generation Alternative.

C. Document issues – Conservation:

1) Conservation Planning Areas

Some recreation sites and their access roads may be located on private property within proposed Conservation Planning Areas (CPA's). If such lands are acquired for conservation using developer fees, these recreation sites and their access roads may be closed by state or federal wildlife management agencies that administer the CPA's. Therefore, when land is acquired in Conservation Planning and Priority Areas, existing OHV routes that tie into adjacent designated routes on public lands should be automatically designated open until there occurs a public process to designated otherwise.

2) National Conservation Landscape System

The NLCS was established in Section 2002 of the Omnibus Public Lands Management Act of 2009. Subsection (c)(2) directs the Secretary to manage the system "in a manner that protects the values for which the components of the system were designated."

The CDCA was designated by Congress in the Federal Land Policy and Management Act of 1976. In Section 601 [43 U.S.C. 1781] subsection (a)(1) Congress found that "the California desert contains historical, scenic, archeological, environmental, biological, cultural, scientific, educational, recreational, and economic resources."

Section II.3.2.2.1.1, paragraph 1, of the DRECP Draft EIS/EIR states that "future travel management planning will emphasize travel on routes that provide for the enjoyment and enhancement of the ecological, cultural, and scientific values for which individual units are designated." Unfortunately, the CDCA's Congressionally recognized value of recreation is omitted from this key NLCS CMA.

Therefore, this paragraph must be changed to include recreation so that it reads:

"Future travel management planning will emphasize travel on routes that provide for the enjoyment and enhancement of the ecological, cultural, scientific and recreational values for which individual units are designated."

During the Stakeholder process assurances were sought by recreation representatives that would prevent the DRECP from leading to the closure of designated routes on conservation lands. As proposed, the NLCS CMA's would do just that.

D. Document issues – Recreation:

Special Recreation Management Areas

Visitor access to some OHV Open Areas, such as Razor and Dumont Dunes, require the use of BLM designated routes. Although SRMA's are proposed to overlap OHV Open Areas in order to excluded them from renewable energy development, the access roads to these area are not included.

Therefore, SRMA's for OHV Open Areas must be expanded as necessary to include necessary visitor access roads.

E. Document issues – Mining:

Restrictions on Mining

The DRECP does not have the authority to repeal the National Mineral and Mining Policy Act of 1872, 30USC 21. However, CMA's for the proposed NLCS and ACEC's appear to contain restrictions on mining beyond the DRECP's scope of authority.

On behalf of the Public Lands Roundtable of Ridgecrest, thank you for this opportunity to comment on the DRECP Draft EIR/EIS. We appreciate your kind consideration of these consensus comments.

Sincerely,



Randy Banis
Chairman