

May 22, 2012

TO: DRECP REAT Agencies
FR: Randy Banis, Stakeholder Committee, California Off-road Vehicle Association
RE: Development Scenarios - Docket 09-RENEW EO-1

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DATE	MAY 22 2012
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Thank you for this extended opportunity to submit comments on the Development Focus Area Scenarios and preliminary Conservation Area. The May 8, 2012 methodology memorandum was especially helpful.

The California Offroad Vehicle Association seeks to minimize the impacts of the DRECP on recreation while fully recognizing the need for shared sacrifice among all Californians in building our energy future.

Through stakeholder breakout sessions the outdoor recreation community assembled a "top issues" list that centers around these two simple objectives:

1. that Open OHV Lands be excluded from both Development Focus Areas (DFA) and Conservation Areas
2. that designated OHV roads and trails not be closed as a result of project siting or conservation

Based on these objectives, I offer the following comments, please.

A. Scenarios #1 through 6 – General

Open OHV Lands

I appreciate that Open OHV Lands have been excluded from the DFA's as depicted in Scenarios #1 through 5. Although this has been the intent of the Renewable Energy Action Team (REAT) agencies since the start, Scenario #6 gives me concern with regard to this commitment.

Special Recreation Management Areas

With regards to Special Recreation Management Area (SMRA) lands, I have progressively heightened concerns starting with Scenario #4. The jump to Scenario #4 nearly doubles the incursion into SMRA's, supplying greater than 11% of the DFA's total acreage. This loss is significantly greater than that of other non-biological resources and uses, such as ACEC's and grazing allotments. I believe that a "Scenario #3.5" is necessary in order to more evenly distribute the impacts on SMRA's.

B. Scenarios #1 through 6 – Specific

Scenario #1

From the perspective of recreation, I have no major concern to the DFA's depicted in the first scenario.

Scenario #2 & #3

Both of these scenarios exclude Open OHV Lands, but do represent significant incursions into SMRA's in the Lucerne Valley and Cantil areas. Both these DFA's are located within recreational access corridors which could affect important OHV connectivity to neighboring recreation areas. I remain hopeful that such issues could be worked out in each applicant's site specific analysis. However, recommend a "best practices" provision that mitigates the loss of OHV connectivity.

Scenario #4

I appreciate that this scenario also excludes Open OHV Lands from the DFA's.

My greatest concern with this scenario is the addition of a wind DFA within the Stoddard SMRA that almost by itself nearly doubles the commitment of SMRA lands compared to Scenarios #3 & #4. I believe the potential conflict in this area was underestimated with regard to OHV connectivity between the Stoddard Valley and Johnson Valley SMRA's. Large scale wind developments in the desert have historically fenced off all recreational access through their farms. Doing so within this DFA would result in an irreplaceable loss of recreational opportunity.

I have other concerns with regard to OHV connectivity in other DFA's proposed by this scenario, such as the solar DFA at Trona. Along the eastern shoreline of Searles Lake is the only OHV connectivity between the WEMO and NEMO route networks within the BLM's Ridgecrest Resource Area. Also, the suggested wind DFA south of Coyote Lake also occupies a critical OHV connectivity corridor between the Afton and the Superior/Rainbow Basin SMRA's that is finitely limited by Interstate 15 and the Fort Irwin Army base. Lastly, the solar DFA near Inyokern is also within a key OHV connectivity corridor between Ridgecrest and the Southern Sierra Mountains that is rigidly constrained by the junction of SR 14 and US 395 and the China Lake Navy base.

The removal of the Stoddard area wind DFA, and commitments to address OHV connectivity in the other DFA's could significantly reduce the impacts on recreation posted by this scenario.

Scenario #5

Again, I positively note that Open OHV Lands have been excluded from DFA's under this scenario.

In addition to my concerns with the previous scenarios, my greatest concerns here lie with the Jawbone area wind DFA and the Kramer area solar DFA. The Jawbone DFA is sited in an area already rife with resource conflicts, generally centered around the hundreds of thousands of recreation visitors annually. Wind resource development in the greater Jawbone area has already resulted in the elimination of motor-dependend activities on thousands of acres of public lands.

The solar DFA that extends south of Kramer Junction could restrict or eliminate significant recreational opportunities in the area. The Kramer Hills has long been renown for gem & mineral collecting. Also, there is an irreplaceable, robust, and well-used designated route network within the DFA, one especially rich in single track (motorcycle) trails.

Lastly, the solar and wind DFA's in the Yucca Valley area are of concern due to their location within a constricted OHV connectivity corridor. Efforts would have to be undertaken so as not to choke off OHV connectivity between Palm Springs and High Desert.

Scenario #6

I sharply oppose this scenario, first, because it proposes DFA's that significantly encroach on important Open OHV Lands. Second, under this scenario recreation opportunities would be restricted or eliminated on 20% of SMRA lands. Both would result in an unfairly disproportional impact on the DRECP's "innocent bystanders" – recreation.

In addition to my concerns express for Scenarios #3, #4 and #5, I am strongly concerned about the loss of Open OHV Lands in the El Mirage, Stoddard Valley and Johnson Valley areas. The El Mirage area is especially popular not only for motorized recreation, but also for wind recreation such as land sailing and paragliding. The Johnson Valley area, the largest Open OHV Area in the DRECP, is poised to loose up to two-thirds of its land to an expansion by the adjacent Marine Corps base; this scenario proposes to take the remaining one-thing.

These encroachments by DFA's into Open OHV Lands are not occurring in the deeper parts of the desert. Rather, they are within the Open OHV Area lands adjacent to the urban population that utilizes them. This would have effects on the surrounding environment and OHV management that need to be well analyzed and mitigated.

Under this scenario DFA's would absorb 20% of SMRA lands, more than double the acreage in the previous scenario, and more than six time that of Scenarios #2 & #3 – our preferred scenarios. OHV connectivity would be choked off all across the desert. Trailheads and recreation access points would be made inaccessible. Untold site specific recreational activities would be eliminated such as model rocket launching, gem & mineral collecting, and hunting.

I urge the REAT agencies to drop this scenario all together and not spend further time or resources developing this non-starter.

C. Preliminary Conservation Areas

I applaud the REAT agencies for excluding Open OHV Lands from the Preliminary Conservation Area (PCA) designation. As pointed out in the methodology memorandum, these areas contain their own mitigation strategies.

From the perspective of motor dependent recreation, the PCA is essentially comprised of BLM Limited Use lands where motorized travel is restricted to designated routes. Due to good travel management, effective route designation, and strong user compliance, these roaded areas still contain the high biological value lands that are now targeted for conservation. This demonstrates that motor-dependent recreation and conservation are not incompatible, and that road closures need not be a part of DRECP's conservation strategies.

Therefore, I am less concerned about the PCA's boundaries than I am the potential conservation strategies that will be put into place. Such strategies have yet to be proposed and discussed by stakeholders. I look forward to working with the REAT agencies as they draft the conservation strategies so as to further minimize the impacts of the DRECP on recreation.

Summary

I support the exclusion of Open OHV Lands from all DFA's as depicted in Scenarios #1 through #5. However, I believe that Scenarios #2 and #3 are the true starting points from the perspective of recreation. There are DFA's that are proposed in Scenarios #4 and #5 that are acceptable, and there are some that would be harmful to recreation.

Whereas I do not oppose the Preliminary Conservation Area design, I remain concerned that conservation strategies that will be put into place will restrict or eliminate recreation.

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