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Sacramento, CA 95833-1945**

January 31, 2013

California Energy Commission
Dockets Office, MS-4
Docket No. 09-RENEW EO-01
1516 Ninth Street
Sacramento, CA 95814-5512
via email to: docket@energy.state.ca.us

Re: Description and Comparative Evaluation of Draft DRECP Alternatives

Dear Commissioners,

The California Offroad Vehicle Association (CORVA) remains an involved participant in the development of the DRECP. As their representative to the DRECP Stakeholder Committee, I offer the following comments regarding the Description and Comparative Evaluation of Draft DRECP Alternatives.

I'd first like to thank the REAT agencies for addressing several concerns from my previous comments. You should find the comments herein consistent with those I expressed in my submissions of May 22, 2012, and August 8, 2012.

OHV Open Use Areas

I'm pleased with the Renewable Energy Action Team's (REAT) continued recognition of the importance of OHV Open Use Areas, and that OHV Open Use Areas and utility scale solar and wind energy projects are incompatible.

However, I again urge the REAT to establish additional OHV Open Use areas through the DRECP. The purpose of the DRECP is to plan for future needs. With the Marine Corps now finalizing plans to take most of the Johnson Valley OHV Open Area (the largest OHV Open Area in the DRECP) and OHV use again increasing, now is clearly the time to plan for additional OHV Open Use acres.

Special Recreation Management Areas

I'd like to recognize the efforts taken by the REAT to minimize the encroachment of renewable energy development into Special Recreation Management Areas (SMRA). I support the exclusion of utility scale solar and wind energy ROW's from SMRA's as proposed in the Conservation and Management Actions in Appendix E.

Contrary to Appendix E, however, Table 4.2-8 shows DFA acreage within SRMA's in all of the action alternatives. I look forward to this discrepancy being closed in the next draft by revising Section 4.2 and the GIS layers so that they match the exclusion proposed in Appendix E.

I also support the designation of new SMRA's, particularly in the eastern and southern portions of the planning area. However, the proposed new SMRA acreage still falls far short of what has been proposed for new NLCS/ACEC acreage.

Other Conservation and Management Actions

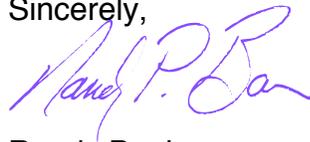
I request that DRECP include within the Comprehensive Trails and Travel Management section coverage for routes within the *State Motorized Trail System* (SMTS), as is done for those within the Back Country Byways Program. The SMTS is a component of the California Recreational Trails Act of 1974 (AB 3594).

I am concerned that the percent of recreation acres subject to the conservation and management actions will skyrocket from 52% to 90% or more in the six action alternatives. Significant funding will be required for travel management on these acres to implement and maintain adequate signs, maps, education, law enforcement and maintenance. Unfortunately, the State OHV Trust Fund grants program is woefully underfunded to perform this function, yet it will take funding to keep people on designated trails.

Finally, I urge the BLM to remove the albatross around its neck known as the WEMO Rand Mountains Management Area permit program. In its place, implement the DRECP's proposed Conservation and Management Actions, such as route signing, route maps, kiosks, and law enforcement. The RMMA permit program was hastily conceived, is rife with operational holes, and does not meet the user fee requirement under the Federal Lands Recreation Enhancement Act (FLREA).

Thank you for your kind consideration of my comments.

Sincerely,



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California Off-Road Vehicle Association
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