



## California Association of 4 Wheel Drive Clubs

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California Energy Commission  
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Sacramento, CA 95814-5512

California Energy Commission

**DOCKETED**  
**09-RENEW EO-1**

TN # 70175

MAR. 28 2013

Via E-Mail: [Docket@energy.State.ca.us](mailto:Docket@energy.State.ca.us)

Re: Description of Comparative evaluation of Draft DRECP Alternatives

Dear Commissioners:

These comments are submitted on behalf of the California Association of 4 Wheel Drive Clubs (CA4WDC) and its membership. CA4WDC represents clubs and individuals within the State of California that are part of the community of four-wheel drive enthusiasts. Many of our members and supporters live in and/or recreate in the area covered by the *Desert Renewable Energy Conservation Plan Draft Alternatives; Docket No. 09–RENEW EO–01*. This document shall not supplant the rights of other CA4WDC agents and organizational or individual members from submitting their own comments and the agency should consider and appropriately respond to all comments received to this proposed planning project.

While the main focus of CA4WDC is to protect, promote, and provide for motorized recreation opportunities on public and private lands, many of our members participate in multiple forms of recreation; including but not limited to hunting, fishing, camping, hiking, horseback riding, bicycle riding, and gem and mineral collection.

We recognize the positive health and social benefits that can be achieved through outdoor activities. We also recognize that motorized recreation provides the small business owners in the local communities a significant financial stimulus. And, our members are directly affected by management decisions concerning public land use.

Our members subscribe to the concepts of: 1) public access to public lands for their children and grandchildren; 2) condition and safety of the environment; and 3) sharing our natural heritage. The general public desires access to public lands now and for future generations. Limiting access today deprives our children the opportunity to view the many natural wonders of public lands. The general public is deeply concerned about the condition of the environment and personal safety. They desire wildlife available for viewing and scenic vistas to enjoy. They also want to feel safe while enjoying these natural wonders. Lastly, the public desires to share the natural heritage with friends and family today as well as in the future. How can our children learn and appreciate our natural heritage when native species are allowed to deteriorate and historic routes are routinely blocked or eradicated from existence?

CA4WDC supports the concept of managed recreation and believes it is prudent and appropriate management to identify areas where off-highway vehicle use is appropriate. Such use must be consistent with the public lands management plans, the Plan Standards, and all other requirements found in the Plans, as well as state and federal regulations. Recreation, especially recreation off of paved or gravel roads, is the leading growth in visitors to public lands. Improvements in the planning processes help minimize conflicts and potential resource damage while providing for recreation access to public lands.

In the recent DRECP Draft Alternatives, the REAT agencies propose that OHV Open Areas and Special Recreation Management Areas (SRMA) should be "rights-of-way exclusion areas for utility scale solar and wind development." Mitigation measures are also spelled out should recreational values within SRMA's be impacted by renewable energy development. These are presented in Appendix E of the Description and Comparative Evaluation of Draft DRECP Alternatives as Conservation Actions, see pages 100-103. (See: [http://www.drecp.org/documents/docs/alternatives\\_eval/Appendices/Appendix\\_E\\_Conservation\\_Actions.pdf](http://www.drecp.org/documents/docs/alternatives_eval/Appendices/Appendix_E_Conservation_Actions.pdf))

We request that no solar or wind energy projects be developed within the current Bureau of Land Management designated Off-Highway Vehicle Areas. These areas have been reviewed numerous times during previous planning efforts and continue to be the areas designated for intensive recreation activities to address the growing public demand. A close review of the recreation component and the commercial component reveals a vast difference in use criteria; uses that are not compatible.

Locating solar or wind energy projects within the current designated OHV Areas would displace a significant segment of the public with resulting adverse economic and social impacts.

Additionally, numerous Special Recreation Management Areas (SRMA) have been designated for use by OHV recreation. The SRMAs, like the OHV Areas, have been reviewed in past management plans and a management prescription has been developed so that intensive recreation can co-exist with resource concerns. Displacing recreation from these areas in favor of energy development would be counter to the efforts to conserve sensitive resources.

CA4WDC supports the exclusion of Off-Highway Vehicle Areas and Special Recreation Management Areas from large scale Solar or Wind Energy as proposed in the Conservation Management Actions in Appendix E.

CA4WDC supports the creation and designation of new SMRAs (as appropriate) with the condition that DRECP include a comprehensive Trails and Travel Management Section to cover all management of routes in the California Desert Region as encompassed by the DRECP boundaries.

As the proposed conservation areas under all alternatives will increase from 52% to approximately 90% (or more), it is critical that existing areas and trails for public access be identified and managed; including funding for necessary signing and maintenance.

We are pleased that the Energy Action Team (REAT) has acknowledged the importance of recreation within the DRECP boundaries. We request that the varied interests of the public continue to receive recognition throughout the development of the DRECP.

CA4WDC appreciates the opportunity to comment on these important plans. CA4WDC is eager to assist land managers to formulate balanced and enforceable land use plans and we hope these comments have been helpful in beginning your journey. We understand comments such as these are not as clear or concise as they could be. Please do not hesitate to contact John Stewart, (619) 508-8840 if you have any questions or require clarification.

Thank-you,

A handwritten signature in black ink, appearing to read "John Stewart". The signature is fluid and cursive, with a large, stylized initial "J" and "S".

John Stewart  
Natural Resources Consultant  
California Association of 4 Wheel Drive Clubs