



PACIFIC CREST TRAIL  
ASSOCIATION

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California Energy Commission

**DOCKETED**

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To Whom It May Concern:

I am submitting comments on the Desert Renewable Energy Management Plan (DRECP) Draft and Environmental Impact Statement (EIS) and Environmental Impact Report. These comments are specific to the planning and management of the Pacific Crest National Scenic Trail (PCT).

I am writing on behalf of the Pacific Crest Trail Association (PCTA). Our 9,800-member organization is the primary private partner with the United States Forest Service, Bureau of Land Management, National Park Service, and California State Parks in the management and protection of the Pacific Crest National Scenic Trail (PCNST) from Mexico to Canada. Last year alone, programs organized under PCTA's leadership provided over 80,000 hours of volunteer labor to manage the PCNST on the ground and we have participated in dozens of planning processes from the national to the local level in that time.

The PCTA lauds the BLM for its efforts thus far to comply with BLM Manual 2680 – Management of National Scenic and Historic Trails and Trails under Study or Recommended as Suitable for Congressional Designation, and BLM Manual 6250-National Scenic and Historic Trail Administration.

Our support and comments below are grounded in the Manual 2680 and our knowledge that BLM will follow these general requirements, specifically:

3.1 General Requirements

The BLM shall:

- A. Conduct and inventory in accordance with FLPMA Section 201 and the NTSA, etc.
- B. Use the inventory to make informed decision regarding proposed uses within National Trail areas, to identify opportunities to safeguard the nature and purposes of the National Trails, and to allocate the resources, qualities, values, and associated settings and the primary use or uses of the trail during land use planning (NTSA and FLPMA).
- C. Use the inventory to establish a National Trail Management Corridor
- D. Conduct inventory within the National Trail viewshed to identify the areas of potential adverse impact for proposed actions.

Further in 3.6 Assessment and Use of the National Trail Inventory:

A.1 Evaluation of the quality and extent of the identified resources, **both individually and cumulatively**, and the level to which the resources support the nature and purposes of the National Trail.

A.2. Evaluation of the quality and extent of the identified resources, both individually and cumulative, to the level with supports National Trail Characteristics.

These characteristics include but are not limited to: the presence of unique landforms and the degree to which the landform exhibits significant characteristics of the physiographic region;

sustainable and premier trail related opportunities; high scenic values; relative freedom from intrusion; natural conditions, scenic and historic features, and primitive character of the trail area; sustainable trail and resource conditions; opportunities for high-quality, primitive non-motorized recreation experiences, including capability to provide campsites, shelters and related public use facilities and continuous and sufficient public access; absence of highways, motor roads, mineral rich areas, energy transmission lines, commercial and industrial developments, range fences and improvements, private operations and any other foreseeable activities; and human health and safety.

The following comments pertain to the direction proposed in the existing DRECP Draft.

1. **Create a Management Corridor.** PCTA supports the BLM in regards to the Corridor in the proposals for the Preferred alternate, Alternate 2 and Alternate 3. A corridor of generally 5 or more miles will help to safeguard the nature and purposes of National Trails to provide for maximum compatible outdoor recreation potential, and protection, conservation and enjoyment of the nationally significant scenic, historic, natural, and cultural qualities of the areas and associated settings through which such trails may pass, as well as the primary use or uses of the trail. Additional actions are needed to ensure that significant adverse impacts to the nature and purposes of the PCT do not occur. It also needs to be specified how it will be determined when it is “generally 5 or more miles” and if that implies there are areas of less than 5 miles of corridor, then the methodology for approval for a reduced corridor need to be laid out. The distance given of 5 miles, is consistent with middle ground in VRM.
2. **Site Authorization.** These should be categorized as “exclusion areas” and not avoidance areas. Where as a linear proposal from one side of the PCT to the other would require a crossing at some location, this is not true of site based projects.
3. **Linear Rights-of-Way.** These should be categorized as “exclusion areas” except in already designated transmission corridors (lands where there is a currently utilized transmission corridor) or other areas of significant development, for example a public road corridor. We propose the following specific stipulations: rights of way only cross the PCT once and only where it is the only prudent and feasible alternative and all due care is taken to mitigate impacts.
4. **Renewable Energy Rights-of-Way.** Renewable Energy Rights-of-Way should reflect the same stipulations as Linear Rights-of-Way. These should be categorized as “exclusion areas” except in already designated transmission corridors (lands where there is a currently utilized transmission corridor) or other areas of significant development, for example a public road corridor.
5. **Land Tenure.** PCTA supports alternatives 2 and 3 where exchange, purchase, or donation of lands in NSHT Management Corridors would be allowed. Disposal of lands in NSHT Management Corridors would not be permitted. For Land Tenure, the direction laid forth in 2 & 3 should become the preferred alternative.

6. **Locatable Minerals.** PCTA supports alternatives 2 and 3 where lands are proposed for withdrawal from mineral entry. Withdrawals would be subject to valid existing rights. For Locatable Minerals, the direction laid forth in alternatives 2 & 3 should become the preferred alternative.
7. **Saleable Minerals.** PCTA supports alternative 2 where they are unavailable.
8. **Leasable Minerals.** PCTA supports alternatives 2 and 3 where they are unavailable or unsuitable for all leasing. The direction laid forth in alternatives 2 & 3 should become the preferred alternative.
9. **Recreation.** PCTA partially supports the proposals in Alternates 2 and 3 but those need to be amended for complete support. Commercial Special Recreation Permits should provide for traditional use of the trail that might be beyond the level of certain users (as stated in the legislation for designated Wilderness). For example, typical users may not have access to horses and equipment to participate. A commercial use facilitates the public's ability to participate in this recognized use.  
**Large groups should be added to the language in this area.** The amended text should read "Competitive Event and Large Group Special Recreation Permits would not be permitted." Large Groups are classified as organized events with more than 75 people. These non-competitive but organized events have a substantial interference on uses for which the trail was established. In addition, they can cause significant resource damage.
10. **Reclassify the PCT Corridor to VRM Class I or Class II.** It is inconsistent with the desired condition and nature and purpose of the PCT for it to be inventoried as anything but VRM Class I or II. This is required by direction found in the BLM Manual 2680 (Chapter 4, Section 2, Subsection E.1.i.a)
11. **Mitigation Requirements.** PCTA appreciates the foresight to mandate mitigation for impacts to the PCT. However, through past experiences it's evident that on and off site mitigation are rarely successful at removing all impacts from a project. If there is no priority order in which it's required to pursue mitigation, overtime, a major financial backer may, in essence, buy the right to cumulatively impact the PCT experience through various proposals that would have impacts to the trail experience and mitigation would not fix or address that situation. Further with those cumulative impacts, over time we would end up with a damaged PCT experience. We believe that this is in line with current direction and in BLM mitigation direction soon to be released nationally.

Therefore, PCTA recommends the following edits to the DRECP "If a segment of a National Trail traverses a DFA, it will be subject to mitigation for impacts to trail features, including, but not limited to, and in priority order: avoidance, the cost of trail relocation, on-site mitigation and off-site mitigation. Compensation can include acquisition or restoration of corridor features and landscapes will be at a minimum of 2:1, and must result in a net benefit to the overall trail corridor. Development of high potential route segments must not substantially interfere with the nature and purposes of the National Trail. The next tier of mitigation should not be pursued unless the tier above it is unobtainable."

It is also advisable for the lands .5 mile from centerline (classified as foreground) to be in an exclusion area and lands in the rest of the corridor (classified as foreground and middle ground) as avoidance areas.

In order to adequately consider our suggestions, we would like to have a meeting with the Renewable Energy Action Team and including the lead agency managers for the PCT for the US Forest Service (Beth Boyst) and the BLM (Mark Conley).

As always, the PCTA wishes to offer our assistance in regards to a comprehensive analysis of the DRECP to prevent future impacts to the PCT.

Sincerely,

A handwritten signature in black ink, appearing to read "Anitra I. Kass", with a long horizontal flourish extending to the right.

Anitra I. Kass  
Regional Representative  
Pacific Crest Trail Association

A handwritten signature in blue ink, appearing to read "Mike Dawson", with a large, stylized loop at the beginning.

Mike Dawson  
Director of Trail Operations  
Pacific Crest Trail Association

cc: Chris Beale  
Scott Flint  
Vicki Campbell