February 23, 2015

California Energy Commission
Docket Office, MS-4
1516 Ninth Street
Sacramento, CA 95814-9512
docket@energy.ca.gov

RE: DRECP NEPA/CEQA

To the Renewable Energy Action Team,

The Gear Grinders 4WD Club, Inc. represents 38 member families who utilize the California Desert Conservation Area (CDCA) for family recreation. Our concerns are going to revolve mainly around continued recreation on these desert lands addressed by the Desert Renewable Energy Conservation Plan.

Before addressing the issues that pertain to us, we would like to address the fact that this massive document should have more time to be studied. We would like to request that the comment period be extended to after the release of the WMD Draft Plan. The comment period could coincide with the ending of the WMD Draft Plans comment period.

1. We noticed that the long established land use designations of the California Desert Conservation Area Plan of 1980 (CDCA) have disappeared in this DRECP Draft document. These land designations have stood the test of time and are well recognized throughout the recreational community. We believe that after 35 years the following land designations should remain:
   a. Multiple-Use Class I (Limited Use)
   b. Multiple-Use Class M (Moderate Use)
   c. Multiple-Use Class I (Intensive Use)

2. Several members in the Gear Grinders have been involved with land use issues since 1976 or for the last 35-20 years or so. Our concern lies with the blanket Areas of Environmental Concern (AEC) over the entire desert. We realize that the AEC designation is an attempt to designate land not suitable for renewable energy; however, an AEC is very restrictive and does not always allow uses that have been in existence for many years. Case in point is the 20-year event, Paramount Valley Days, put on by the California Association of 4WD Clubs. This is a permitted, non-competitive event. The routes used for runs are on existing roads and trails. Unless this event is grandfathered into the DRECP, this event would not be allowed in an...
ACEC. What other CA4WDC events out there would this affect? High Desert Round-Up, for one along with many others. The granddaddy of all, the Tierra del Sol Desert Safari now in its 35th year. Other events would also be affected. Would there no longer be competitive events allowed, i.e., off-road, 4WD, or motorcycle events (off road racing), even though they are in an open area? What about equestrian events such as the endurance rides? Even though horses are an accepted mode of transportation, even in a wilderness area, a competitive endurance ride would not be compatible in an ACEC.

3. In the Panamint Mountains/Lake area, the removal of routes in some riparian areas, including Pleasant Canyon, has been suggested. This trail is in our back yard and one of our favorites because of its lush vegetation and the primitive, historical significance of the trail. The alternative is a dozer-maintained graded road on top of a ridge, that will be impassable when wet and has little scenic value. We don’t want to lose this trail, the only remaining canyon trail that has not already been closed. We would also like to remind you that “this is not a route closure plan”!

4. Visitor access to some OHV Open Areas, i.e., Rasor via Rasor Road and the Dumont Dunes, require the use of BLM designated routes. Although SRMA’s are proposed to overlap OHV Open Areas in order to exclude them from renewable energy development, the access roads themselves, to these open areas are not included. Access to these Special Recreation Management Areas must be expanded in the SRMA’s for continued OHV access.

5. There are so many layers over the desert, between NLCS areas, ACEC’s, SRMA’s, and ERMA’s, which land use classification takes precedence?

6. Continued mining and mining exploration can only be authorized and regulated by the BLM as per the 1872 National Mineral and Mining Policy Act. We feel any mention of mining in the DRECP should be removed.

Thank you for your time considering these Gear Grinders 4WD Club’s comments.

Sincerely,

Jack Brown

Jack Brown, President
P.O. Box 32
Ridgecrest, CA 93556

CC: John Stewart, CA4WDC
    Randy Banis, Death Valley.com
Response to Comment Letter E120

Gear Grinders 4WD Club Inc.
Jack Brown
February 23, 2015

E120-1 Thank you for your comment. While this comment has not resulted in a change in the document, the BLM has taken it into consideration.

E120-2 The Draft DRECP and EIR/EIS had a 5-month comment period (9/23/14 through 2/23/15), which included one extension. The BLM is coordinating the WEMO and DRECP LUPAs to ensure consistency between the two decisions. Additional information on the relationship between the two decisions has been added to Volume I.

E120-3 Your preference for the No Action Alternative has been noted.

E120-4 Activities within ACECs are managed according to their management plans. The restrictive nature presented in your comment is not the intent of the BLM. Clarifying language has been provided in Appendix L.


E120-6 See response E101-16.

E120-7 BLM Manuals provide guidance for managing resources in each of these land use designations. NLCS units are intended to protect large landscapes with multiple values, special values of river corridors, and important historic trails and sites. ACECs are specific sites intended to protect individual high-value resources. Guidance for SRMAs and ERMAs focuses on recreation management in balance with resource conservation. Where NLCS units and ACECs overlap, for example, management policies and planning documents for each unit will apply. The higher level of resource protection will apply to areas of overlap.

E120-8 The BLM is not aware of the National Mineral and Mining Policy Act of 1872 but believes that you are referring to the Mining Law of May 10, 1872. Or you may be referring to the Mining and Mineral Policy Act of 1970 (30 U.S.C. 21). The BLM disagrees that all mention of mining should be removed. It is important that analysis of the proposed impacts to mining be recognized and analyzed.
INTENTIONALLY LEFT BLANK