

**DRECP development focus area scenarios**

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I am submitting these comments on behalf of CORVA and its membership in response to the information presented at the April 25-26 2012 DRECP Stakeholder Committee meeting . Others from our organization will also submit comments.

First, we appreciate the need to develop sources of clean energy to meet the growing needs of Californians. We recognize the economy of scale provided by utility scale renewable energy generation. We take the position that these factors are not incompatible with continued public access to public lands.

As you know CORVA advocates for access to public lands primarily for the purpose of recreation as broadly defined by our representatives. The CDCA specifically addresses both "access" and "recreation" as separate but closely related elements of the plan. We are pleased that the DRECP development process has acknowledged historical uses of the desert and is considering them during the planning phase.

Under "Key Concepts" the DRECP includes the statement that "historic uses (OHV) will be considered through the EIR/EIS and CDCA amendment process or the RMP amendment process". We infer that this will apply to all traditional public access to California's desert. We have noted that during the stakeholder meetings that historical uses are in fact being considered during the "pre-NEPA" phase of the process. This has provided an opportunity for us to participate in the early stages of DRECP development. We are grateful for this opportunity.

The DRECP Goals include: " provide a comprehensive means to coordinate and standardize mitigation and compensation requirements for covered activities within the planning area". The primary purpose of the DRECP will be to provide endangered species permit assurances, but in order to achieve "standardization of mitigation and compensation requirements" it will be necessary to make substantial revisions of the CDCA and associated land management plans. We are concerned that recreational uses of the desert could be displaced during the plan revision process.

At the April 25-26 meeting six Development Focus Area (DFA) Scenarios were presented. These involve increasing amounts of public land ranging from Scenario 1-6. Of concern is the large amount of public land present ACEC's and SRMA's that is within the DFA's in Scenarios 4-6.

It is unclear what inclusion and exclusion criteria were used in scenario development. It is therefore difficult to comment on them in detail. For example, will mitigation lands be required outside of the DFA's, or can they exist within them? What will be the intensity of development within the DFA's? Will the DFA's exclude other potentially compatible uses such as recreation?

Scenario 6 has fundamental problems. This scenario fails to consider the proposed expansion of the Marine Corps base into Johnson Valley. We are not aware that the pending EIS considers renewable energy development in that area. Scenario 6 also encroaches into El Mirage, one of the OHV open areas set aside under the CDCA.

There is a significant expansion of the DFA's in Scenario 4 into the ACEC's and SRMA's as compared to Scenario 3 which is of great concern to our members. Whether or not this might be ameliorated by allowing recreational use within DFA's is yet to be determined.

Development of the Biological Reserves will also have to be finalized before we can provide detailed comments on DFA Scenarios 2 and 3. It is not yet clear whether or not these will limit public access. That will be a key issue for our members

Thank you for the opportunity to comment during the development of the DRECP.