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Sacramento, CA 95833-1945



August 8, 2012

California Energy Commission  
Dockets Office, MS-4  
Docket No. 09-RENEW EO-01  
1516 Ninth Street  
Sacramento, CA 95814-5512

RE: Docket Number 09-RENEW EO-01 / DRECP Alternative Scenarios

Dear Sir or Madam,

The California Off-road Vehicle Association (CORVA) works to maintain motorized access and recreational opportunities on our public lands. We wish to offer the following comments regarding the DRECP alternatives that were presented to the Stakeholder Committee on July 25, 2012.

1. OHV Open Use Areas

We appreciate the REAT's continued recognition of the importance of OHV Open Use Areas, and that they and renewable energy development zones are incompatible.

However, given that the DRECP appears to be undertaking the ultimate carving-up of the desert through land use designations and zoning, the REAT needs to consider establishing new OHV Open Use areas now while it still can.

OHV recreation is again growing in popularity, at the same time that other uses are pushing OHV use into smaller areas. Now that the U.S. Marine Corps has finalized their expansion plans into the Johnson Valley OHV Open Area, the DRECP should properly mitigate this significant change by designating new OHV Open Use lands within the planning area.

2. Special Recreation Management Areas (SMRA's)

We recognize the great lengths taken by the REAT to minimize the encroachment of renewable energy development into SMRA's. We also applaud that the REAT sees the compatibility of conservation and recreation by continuing to overlap SMRA's and ACEC's as appropriate.

Although we especially appreciate that the REAT found it important to propose new SMRA lands in the eastern portions of the planning area, we fear it is not enough to adequately plan for the future of recreation.

Therefore, each existing and proposed ACEC should be specifically evaluated for suitability for locating an overlapping SMRA designation.

### 3. The Stakeholder Committee

We appreciate having been a part of the Stakeholder Committee and can only imagine the consequences had recreation not been represented.

We strongly believe it is too early, though, to be winding down the Stakeholder Committee. It is urgently important that the development of rule sets for the conservation lands be done with the full participation of the Stakeholder Committee in the same manner as was done for all of the other hot-button issues.

Via our Stakeholder Committee, counties worked through the plan's boundary issues, renewable energy interests hammered out their development zones, and the environmental community identified covered species and conservation lands.

From the very start we alerted the REAT that our #1 concern was avoiding road closures, and we pointed out early on that the impetus for such closures would be the conservation strategies.

DRECP staff made it clear that the Stakeholder Committee would identify and tackle the tough issues up front and not leave them until the end. Here we are near the end and we've learned that the conservation area rule sets will be developed behind closed doors, leaving further meaningful input and stakeholder scrutiny until the release of the Draft EIS. This is contrary to the *Key Issues Tracking Table* which designated the preliminary conservation strategy as the appropriate process step for these critical concerns.

We urge the REAT to continue holding our Stakeholder Meetings, both in person and via WebEx, until a draft conservation area rule set has been presented to Stakeholder Committee for a thorough discussion.

Thank you for your kind consideration of our comments.

Sincerely,



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/s/

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