

February 16, 2015

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



Re: Draft DRECP and EIR/EIS

The DRECP will usher in a bold new approach to utility scale renewable energy development in the California Desert. This development will be so impactful as to cause great changes to federal, state and local land use policy all across its massive 22 million acre planning area.

To a great extent, the grandeur of this effort excuses the length and complexity of the plan. Although the EIR/EIS is a well organized document, it has nonetheless been a challenging process for me to fully form a vision of the outcome of the proposed plan.

A. Process Issues

1. Public Comment Period

Despite an enormous effort, I was unable to fully complete my analysis of the document within the allotted public comment period. Even as I write this, I'm still uncovering new concerns, and failing to find answers to others. 150 days has not yielded enough time to analyze both the draft document with regard to the stated potential adverse affects on the 14,329 miles of routes within the planning area.

Furthermore, the DRECP will result in 143 new defacto management plans for ACEC's in the form of the BLM Worksheets in Appendix L. Any one of these ACEC's would normally see a minimum 30 day comment period for the public to evaluate and respond to the proposed conservation management actions. Yet, here the public is expected to review and comment on 143 different sets of unit level management prescriptions within the same 150 comment period as the rest of the DRECP Draft EIR/EIS.

Therefore, in order for me to completely analyze this Draft EIR/EIS, I request an additional 45 day extension to the public comment. Furthermore, such an extension would fully meet the recommendation of the BLM Desert Advisory Council for a 180 day public comment period. [See: *U.S. Department of the Interior Bureau of Land Management California Desert*

District Advisory Council, Reporter's Transcript of Proceedings, September 27, 2014.]

At the risk this request is not met, please find below the comments that I have been able to assemble within the time allotted.

2. Public Meetings

I applaud DRECP planners for holding public meetings in the desert communities within the planning area. I also commend planners for taking oral comments at these meetings, and for the use of stenographers to capture the public's comments. Furthermore, I appreciate the availability of key staff from each of the REAT offices being present at each public meeting to directly answer the public's questions.

However, the public meetings were held too early in the comment period for the public to offer meaningful comments and questions. Although the subsequent webinars were helpful, additional public meetings should have been held later in the comment period.

B. Document Issues - General

3. Alternatives

I compliment planners for the number and range of alternatives presented for analysis. Any more than the six presented would have only added more complexity. However, Extensive Recreation Management Areas (ERMA's) are proposed only in the Preferred Alternative. This goes against the need to analyze a wide range of alternative and ERMA's should have been analyzed in more than one alternative.

Therefore, I recommend that should there be a Supplemental Draft EIR/EIS, ERMA's be analyzed in more than one alternative. Otherwise, I request that ERMA's be carried forward to the Final EIR/EIS.

C. Document Issues - Renewable Energy

4. Recreation Mitigation

I support the proposed mitigation requirement for adverse impacts to recreation resulting from DRECP renewable energy development. Mitigation requirements for losses to motorized and motor dependent recreation can include re-routing roads and trails and re-establishing campsites. Mitigating for lost gem and mineral collecting sites, however, poses a more difficult challenge as the mineral resources exist where they are and can't be moved.

I request planners consult with a broad cross section of recreation leaders to develop more specific and robust mitigation methods for the Final EIR/EIS.

5. Private vs. Public Lands

I support the siting of commercial utility scale renewable energy development on nonfederal lands. I request that the plan focus solar development on federal lands only within the existing Solar Energy Zones identified by the 2012 Solar PEIS, and that there be no new Development Focus Areas established for solar energy development federal lands. Wind energy development should be focused within DFA's only on nonfederal lands.

6. Development Focus Areas (DFA's)

a.) I request the deletion of the DFA in Alternative 2 that straddles Highway 14 north of Red Rock Canyon. This area contains important recreational values that are incompatible with utility scale renewable energy development.

b.) I request the deletion of the DFA in the Preferred Alternative that encroaches on the Mountain Pass Dinosaur Trackway ACEC due to existing values in the area that are incompatible with utility scale renewable energy development.

c.) I request that the Fremont Valley DFA be scaled back so as not to encroach on the Desert Tortoise Natural Area and the adjacent ACEC.

d.) I request the elimination of any portions of a DFA that overlaps SRMA's and ERMA's, for example the incursion on the Stoddard/Johnson SRMA in the Preferred Alternative and Alternatives 3 and 4. This also includes eliminating exceptions in all action alternatives that allows geothermal energy development in the Ocotillo Wells East SRMA.

e.) I request the removal from DFA the Brown Buttes / Lonely Buttes gem and mineral collecting sites, east of Mojave and south of Highway 58, need to be excluded from the DFA. See Attachment A for map.

D. Document Issues - Conservation

7. National Landscape Conservation System (NLCS) - Route Designation

I find the proposed CMA's for NLCS lands in all alternatives to be overly broad and nonspecific with respect to the proposed restrictions on motorized and motor dependent recreation. I also found the analysis of impacts for

each alternative to be unhelpfully fuzzy and potentially understated with respect to the adverse impacts to recreation.

Most troubling is the analysis in II.3-317 that reads:

"Future travel management planning will emphasize travel on routes that provide for the enjoyment and enhancement of the ecological, cultural, and scientific values for which individual units are designated, or necessary administrative access to conserve, protect and restore area values."

I'm concerned that recreation was omitted from the array of values recognized for emphasis in future travel management planning on NLCS lands. There is a strong likelihood that this could be misinterpreted to *limiting* travel to *only* routes that serve ecological, cultural, or scientific values of the CDCA.

The Omnibus Public Land Management Act of 2009 [PL 111-11, Sec. 2002], which established the NLCS, states in subsection (c) that:

"The Secretary shall manage the system— (1) in accordance with any applicable law (including regulations) relating to any component of the system included under subsection (b) [NOTE: i.e. FLPMA relating to CDCA]; and (2) in a manner that protects the values for which the components of the system were designated [NOTE: i.e. CDCA]."

Subsection (d) states that:

(1) IN GENERAL.—Nothing in this subtitle enhances, diminishes, or modifies any law or proclamation (including regulations relating to the law or proclamation) under which the components of the system described in subsection (b) were established or are managed, including—
(E) the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1701 et seq.).

In establishing the California Desert Conservation Area (CDCA) within the Federal Land Policy and Management Act of 1976 Congress found that:

"the California desert contains historical, scenic, archeological, environmental, biological, cultural, scientific, educational, recreational, and economic resources that are uniquely located adjacent to an area of large population;".

Whereas, recreation is a Congressionally recognized value for which the CDCA was designated, and whereas, Congress seeks to protect the values of which NLCS components were originally designated, I request that "recreation" be added to the array of values to be emphasized in future travel management planning.

If recreation is not added to this language in the Final EIR/EIS, it will go contrary to the agency assurance to recreation stakeholders that designated motorized routes would not be closed by the DRECP. Also, should the agencies not meet this request, then I request the reduction in NLCS designations to the acreage proposed in Alternative 1, or that which exists in the No Action Alternative.

I also wish to note that Subsection (d) also states that:

"Nothing in this subtitle shall be construed as limiting access for hunting, fishing, trapping, or recreational shooting."

Future road closures on NLCS lands would greatly limit access for hunting and recreational shooting in the DRECP area.

8. National Landscape Conservation System - Special Recreation Permits (SRP's)

I also find the CMA regarding SRP's in the Preferred Alternative is overly and unnecessarily restrictive. I request that the Final EIR/EIS reflect the CMA for SRP's that is proposed in either Alternatives 1 or 2.

9. National Landscape Conservation System - Panamint Valley

As they are written and proposed in the Preferred Alternative [per above], there is a strong likelihood that the CMA's for NLCS lands when applied to the Panamint Valley unit would prohibit the continuance of Panamint Valley Days, an annual event conducted by the California Association of Four Wheel Drive Clubs under an SRP issued by the BLM.

Also, as written and proposed in the Preferred Alternative, there is a strong likelihood that these CMA's would also cause in the future closure of designated motorized routes in and around the Argus Mountains and Slate Range that are of high importance to recreational users. One route at particular risk of closure through these CMA's would be the recently designated Nadeau National Recreation Trail because "recreation" is not stated as a value for emphasis in future route designation. Another is Manly Pass across the Slate Range into southern Panamint Valley.

Due to the "more restrictive shall apply" clause regarding NLCS CMA's, the protections for recreational routes of travel in this SRMA's mean nothing.

Therefore, should my requests from item #7 above not be carried over to the Final EIR/EIS, I would request that the Panamint Valley NLCS unit be deleted from the plan.

10. Conservation Planning Areas

Some recreation sites and their access roads may be located on private property within proposed Conservation Planning Areas (CPA's). If such lands are acquired for conservation using developer fees, these recreation sites and their access roads may be closed by state or federal wildlife management agencies that administer the CPA's.

Therefore, when private land is acquired in Conservation Planning and Priority Areas, I request that existing OHV routes that tie into adjacent designated routes on public lands should be automatically designated open until there occurs a public process to designated otherwise, perhaps conducted by the OHMVR Division of State Parks. Same should apply to routes leading to existing and traditional campsites, staging areas, trailheads and other recreational destinations.

11. Areas of Critical Environmental Concern (ACEC's)

a.) Conservation Management Actions (CMA's) for some ACEC's may negatively affect even casual recreational use by the public, for example hunting, rockhounding, and OHV touring.

CMA's for the Bristol Mountains ACEC propose the "issuance of Special Recreation Permits for... recreational travel along roads and trails designated open in the land use or accompanying activity level plans."

In no way should a casual use such as recreational touring require an SRP. This is a dangerous, precedent setting measure that is antithetical to travel management in the rest of the planning area. Therefore, I recommend this CMA be rescinded in the Final EIR/EIS. I further request that the casual use of public lands not be negatively impacted by proposed CMA's for the ACEC's.

b.) ACEC worksheets regularly throughout call for "limited off-highway vehicle use" without punctuating with "on designated routes." The result of this language are likely to be the closure of roads and trails that are currently open for motorized use.

Therefore, I request that where BLM Worksheets for ACEC's suggest "limiting off-highway vehicle use" that it be followed by "on designated routes."

Additional comments regarding the BLM Worksheets for ACEC's are contained in Attachment B.

c.) Several ACEC worksheets omit existing recreational uses from the stated array of allowable uses. For example, gold prospecting is a well known recreational activity within the Coolgardie Mesa ACEC, however rockhounding is not listed in the worksheet among the allowable uses.

I recommend that the ACEC worksheets be researched and revised to achieve a greater coverage of current recreational uses among the stated allowable uses.

d.) Many of the ACEC worksheets propose radical CMA's that should be better disclosed to the public. Instead, they are buried deep within the appendices. For example:

i) Mesquite Lake ACEC: The CMA to "prohibit vehicle access to the playa surface" would cause the closure of NN408 which was designated open to motor vehicles in the Northern and Eastern Mojave Plan (NEMO), an open and thorough public planning process.

ii) Amargosa South ACEC: Management Action 3 proposes to "Close open route in Tecopa Marsh" but does not provide the route number, or indicate whether or not the route is currently designated open.

iii) Panamint Lake ACEC: A CMA proposes to "Keep routes out of streams and significant riparian areas where good alternatives exist, i.e., Pleasant Canyon." Ordinarily, a proposal to close Pleasant Canyon Road (P1681) would draw the interest of a thousand people or more.

iv) Corn Springs ACEC: A CMA proposes to "Withdraw land from further mineral entry," but does not state when and under what process this would occur.

Additional examples are cited in Attachment B.

12. Christmas Canyon ACEC & Spangler Hills OHV Open Area

The BLM Worksheet for the Christmas Canyon ACEC proposes to convert 3,000 acres of the Spangler Hills OHV Open Area from "OHV Open Use" to "Limited Use on Designated Trails." This is contrary to agency assurances

that there would be no reduction in lands designated for OHV Open Use. OHV recreation last year suffered the loss of 80,000 acres of OHV Open Use area to an expansion of military lands – nearly a quarter of all OHV Open Use acreage in the DRECP planning area.

This proposed reduction of 3,000 acres OHV Open Area acreage was not analyzed anywhere within the Draft EIR/EIS, and all tables within the document ignore entirely this significant additional loss to OHV recreation.

Therefore, I request that the Final EIR/EIS include a commensurate 3,000 acre expansion of Spangler Hills OHV Open Area in order to satisfy the agency assurance that the DRECP will not reduce OHV Open Area acreage. For potential expansion areas, see Attachment C.

Should planners choose to reject this request, then I recommend that the BLM eliminate this proposed reduction in OHV Open Use acreage from the BLM's Christmas Canyon ACEC Worksheet.

E. Document Issues - Recreation

13. Special and Extended Recreation Management Areas (SRMA's / ERMA's)

a.) The Preferred Alternative doubles the amount of lands managed for recreation emphasis from 1.5 million acres currently to 3 million acres under the DRECP, and protects them from renewable energy development.

I support plans to increase lands managed for recreation emphasis and exclude them from renewable energy development through the designation of Special and Extended Recreation Management Areas. I ask that these proposed designations from the Preferred Alternative be carried over to the Final EIR/EIS.

b.) I support the use of SRMA's and ERMA's in the Preferred Alternative to exclude renewable energy development from high value recreation lands, particularly as an overlay to the OHV Open Areas.

However, some OHV Open Areas require access roads across public lands, such as Razor and Dumont Dunes, and these, too, should be protected from renewable energy development. Therefore, I request that SRMA's be expanded with corridors that include the access roads to OHV Open Areas.

c.) Several known recreation sites are not located within a proposed SRMA or ERMA. Some of these recreation sites may be located within ACEC's or on

NLCS lands which afford protections from renewable energy development, but the CMA's for these designations may restrict or preclude some activities such as organized events.

Therefore, I request that the follow areas be included with a SRMA or EMRA:

- i) Cargo Muchacho Mountains, including the Tumco mining site
- ii) Dale SRMA, including Humbug Mountains and Pinto Mountains
- iii) Hauser Geode Beds area, which is currently managed under MOU between the BLM El Centro Field Office and the California Federation of Mineralogical Societies
- iv) Kramer Hills Gem and Mineral Collecting SRMA
- v) Silurian Valley SRMA, including the T&T Railroad Trail, the Riggs townsite, cabins and mining ruins, Kingston Wash Road and Silurian Lake Road
- vi) Vinagre Wash SRMA, including Milpitas Wash, approximates Senator Feinstein's proposed Vinagre Wash Special Management Area
- vii) Yuha Desert SRMA, includes gem and mineral collecting sites and a strong network of designated route for street-legal vehicles

See Attachment D for maps.

14. DRECP & BLM Route Designations

Although DRECP's CMA's may yield new sideboards for future route designations efforts, DRECP should in no way trigger new BLM route designations. I recommend that the Final EIR/EIS incorporate and recognize the NEMO, WECO, NECO and WEMO route designations for the entirety of the DRECP.

15. Introduction of Conflicts

Many OHV Open Areas will see adjacent new ACEC and NLCS designations that may introduce new conflicts for management that do not exist today. I request that DRECP's CMA's include measures to assist OHV operators to clearly distinguish open use area from limited use areas with designated trails, including signs, fencing, printed and digital maps, and educational programs.

16. Back Country Byways

The Draft EIR/EIS [see II.3-373] puts forth a program for managing designated motorized routes with CMA's that vary upon each route's classification. The Back Country Byways program treats Type (Tier) 1 and 2 with stronger protections than lower tiers. These lower tier routes allow public access to the most remote of recreational opportunities that yield the greatest appreciation among visitors. Therefore, I request that the Final EIR/EIS include stronger protections for Type (Tier) 3 and 4 roads.

17. Effects on Motorized Access

Section IV.18.5 warns that:

"Recreational destinations may not be readily accessible by motorized vehicle to control ingress and egress to conservation areas or in specific areas such as sand transport areas, riparian areas, and specific-species ACECs. Special Recreation Permits may be prohibited in certain DFAs and sensitive areas; OHV recreational touring outside of designated OHV areas may be further limited in the future to meet ACEC and NLCS conservation goals. Generally, nonmotorized recreational pursuits would be less affected by adoption of the Plan alternatives. Indirect impacts on all recreational activities from changes to the scenic values and esthetic experiences would occur from placement of substantial new renewable energy facilities on the landscape. Additional access limitations and closures in the future in both DFAs and NLCS lands would adversely affect motor-dependent recreational activities."

We could not glean from the Draft EIR/EIS how, when, or where such potential adverse affects on motorized access. A careful review of the BLM Worksheets yielded no such foreseeable impacts, and neither did the discussion of NLCS designations which were unhelpfully vague and nonspecific.

F. Funding

Funding Increased Ranger Patrols

CMA's within the BLM Worksheets for ACEC's repeatedly call for "increasing ranger patrols," yet these and many other management prescriptions are unfunded. This plan should require the BLM to allocate additional resources to its Desert District field offices to carry out the required actions it sets forth.

I'd like to thank the many members of the DRECP planning team for sharing their time and knowledge with me. I appreciated my warm welcome to the Stakeholder Committee, as well as your earnest interest in my comments

throughout this long process. Therefore, I'm confident that these comments will be evaluated fairly and fully, as well.

Regards,



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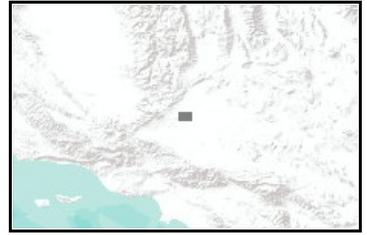
Legend

-  DRECP Boundary
-  Development Focus Areas, Preferred Alt.
-  Conservation Planning Areas, Preferred Alt.

Other Lands, DRECP
Displaying: **Type**

-  Impervious and Urban
-  Military
-  Tribal Lands
-  OHV Areas

 118° 13' 16" W Longitude,
34° 55' 27" N Latitude



Brown Butte/Lonely Butte
Attachment A

Worksheet Maps

- The map PDF's should have been produced with "Layers" feature so layers can be turned on & off by the user.
- The map backgrounds were entirely unhelpful. There are no features except highways; should have used USGS maps for backgrounds.
- Maps should have included designated OHV routes in GTLF layer.
- Maps lack coordinate reference along edges. Maps are too "GIS'ey."
- Map legend reports DFA's as Design Focus Area rather than Development Focus Area.
- Many alternative maps lack polygon labels.
- Worksheets do not include the Mojave Squirrel ACEC and Desert Tortoise ACEC.

Ayres Rock ACEC

- Cultural Resources Management Actions should restrict OHV use to designated routes rather than "prohibiting recreational off highway vehicle use." Many traditional campsites within boundary -- need to specifically prohibit camping in vicinity if the boulders only. Cultural RMA's conflict with Allowable Uses under Recreation.
- Trails & Travel Management:
 - finish sentence about maintaining the vehicle access road, parking area, and kiosk
 - I don't see 200 additional acres of NLCS in Alt. 2 per table
 - this is a very low use area with regard to recreation, however those who visit do so regularly and appreciate its remoteness and lack of other visitors despite being just a few miles from US395. There is no off-route travel on this long established route network, and virtually all motorized access is done via 4x4 rather than green sticker vehicles. Once well used by ranchers and miners, there are no difficult or challenging 4x4 opportunities, therefore visitors are generally dry campers, hikers, and history seekers. The immediate neighboring areas of McCloud Flat and Cactus Flat are one of the only areas visitors have a good chance of seeing wild horses. There is no need for road closures here.

Cerro Gordo-Conglomerate Mesa ACEC

- Objectives: finish sentence: Introduce artificial water sources to prevent further...
- Fish & Wildlife: "Action Item 1: Prevent habitat fragmentation and retain connectivity for wildlife movement by limiting off-highway vehicle use and development". Does this mean further limit OHV, or is OHV already limited by virtue of having a designated route system?

- This is by-and-large a low use area. Although the Cerro Gordo townsite sees many visitors, very few actually deviate from the main county road to explore the many dispersed recreational opportunities in this area, and there is no off-route motorized travel here. There is no need for road closures here.

El Paso to Golden Valley Wildlife Corridor ACEC

- There is no depiction of the Fremont-Kramer Reduction and Western Rands Reduction polygons on the maps.

- There is no depiction of the Eagles Flyway polygon on the maps.

Great Falls Basin ACEC

- I support the CMA: "Follow-through with the existing Great Fall Basin ACEC recommendation to prohibit target shooting within the original ACEC boundaries in the large wash on the approach to and at the base of the falls."

Panamint Lake ACEC

- I support allowing interim trail maintenance for foot traffic in the Surprise Canyon riparian area.

- "Keep routes out of streams and significant riparian areas where good alternatives exist, i.e., Pleasant Canyon." This is a unique recreational experience and should remain available to motorized. All other riparian zones are already off limit to motorized.

Panamint - Argus ACEC

- Surprise Canyon ACEC is erroneously double hashed on Alt. 4 map.

- Great Falls Basin WSA is erroneously double hashed on Alt. 4 map.

Sierra Canyons ACEC

- "A management plan for this area would include restrictions to OHV routes in these areas" -- this is not supported in discussion. Routes have already been thoroughly restricted by a NEMO designations; network is minimal, provides essential access to wilderness-based activities. No OHV off-route problems here.

Christmas Canyon ACEC

- Relevance & Importance Criteria reads "This area was withdrawn specifically from the surrounding Spangler Hills Off-Highway Vehicle Open Area to protect it from further degradation by vehicles." However, Management Actions and Objectives state that this area is still within the Open Use area.

- wrong shape files for Spangler OHV Area; fails to include the overlap with Christmas Canyon ACEC; map of No Action depicts the conversion from Open Area to Limited Use proposed by action alternatives.

- Alt. 4 map appears to incorrectly remove OHV Open Area.

- DRECP document, including Table 7 of the Exec Summary, fails to show this 3,000 acre loss of OHV Open Area under action alternatives.

Colorado Desert - General

- Management Actions for Trail & Travel Management call for route maintenance that must first receive arch clearance before it can occur.
- No discussion of cultural resources under Objectives/Allowable Uses/Management Actions as is with Great Basin, for example. This is of particular concern with respect to the Patton training sites.
- I like the references to ACEC's overlapping proposed SRMA & ERMA's, i.e. "Such-and-such ACEC is within the such-and-such ERMA or SRMA. This should have been done for other regions, such as Great Basin.
- Many are missing Alternative 4 maps (McCoy Wash, Mule McCoy).

Picacho ACEC

- Alt. 4 map is missing; Palen Ford shown instead.

Upper McCoy ACEC

- Does not prescribe motorized travel on designated OHV routes only.

Palen Dry Lake ACEC

- "Allotment: OHV limited to designated routes (none exist), thus no OHV allowed." This seems to ignore designated routes DC634, DC636, DC952, DC950 which all cross Palen Dry Lake.

Clark Mountain, Halloran Wash, Kingston Range ACEC

- There is no discussion of Trails & Travel Management, or Recreation.

Ivanpah ACEC

- The Dinosaur Track FAA is depicted as a DFA.

Mesquite Lake ACEC

- "Prohibit vehicle access to the playa surface." Mesquite Pass Road (NN408) crosses the lakebed surface, and may be a County Road.
- "Action: Prohibit vehicle access and driving in the ACEC to protect the integrity of the mesquite bosque." According to the Worksheet, the threat to the bosque is groundwater mining -- not recreation. Yet, it is proposed as Variance Lands in Alt. 4.

Indian Pass ACEC

- Rockhounding should be included as an allowable use.

Pilot Knob ACEC

- Move the camping prohibitions from Trails & Travel Management to Recreation.

Plank Road ACEC

- Management Plans should include ISDRA RAMP.

Singer Geoglyphs ACEC

- Alt 2 depicts ACEC as within a DFA, but all alternatives call for managing as is.

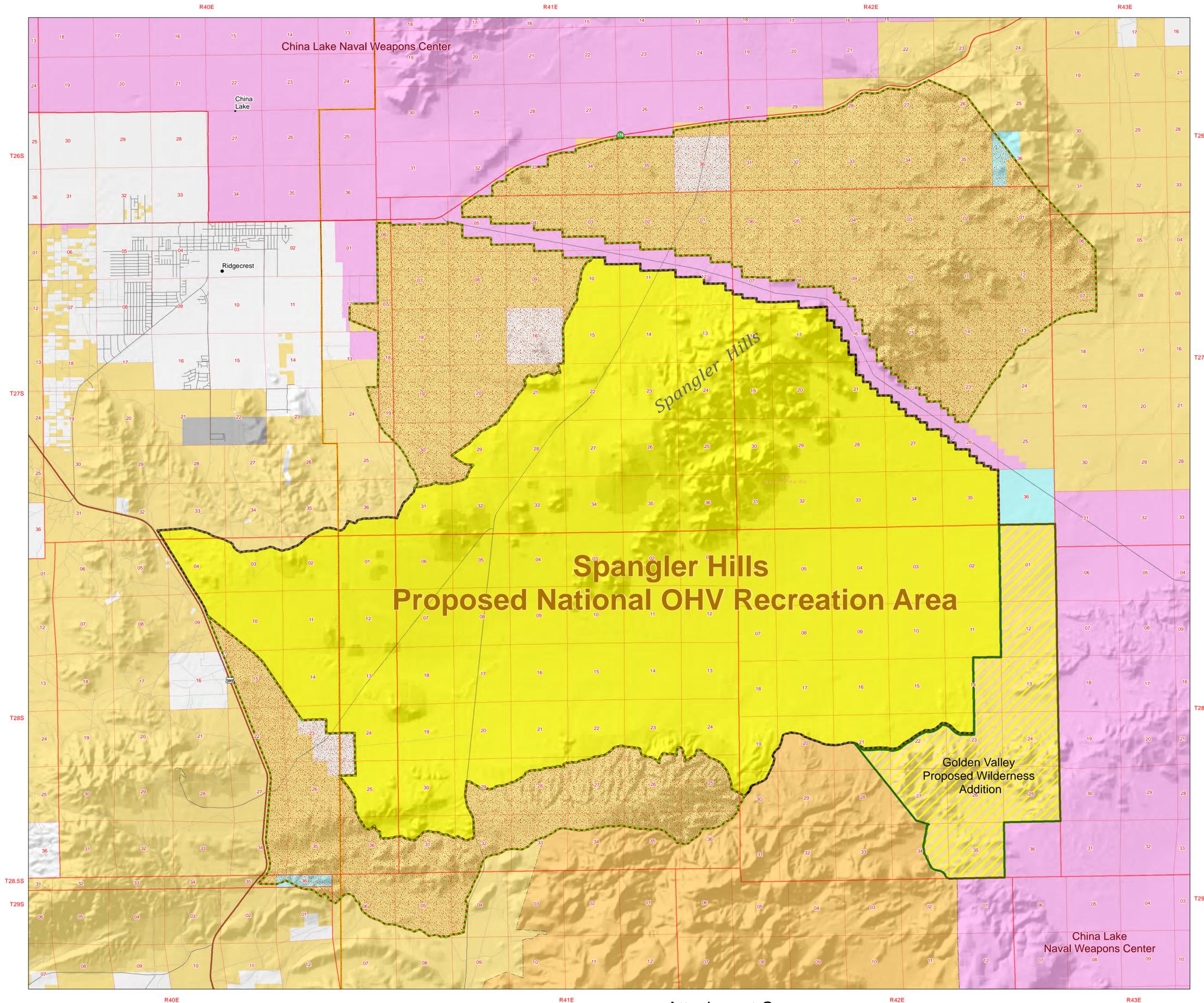
Castle Mountains ACEC

- There are no CMA's regarding Trails & Travel Management and Recreation.

Spangler Hills Proposed Expansion Study Area

January 23, 2015

This map prepared at the request of Senator Dianne Feinstein



- Proposed National OHV Area
- Proposed Expansion Study Area
- Proposed Wilderness Area

Federal Wilderness

- Existing Wilderness Boundary
- BLM
- NPS
- USFWS

Land Status

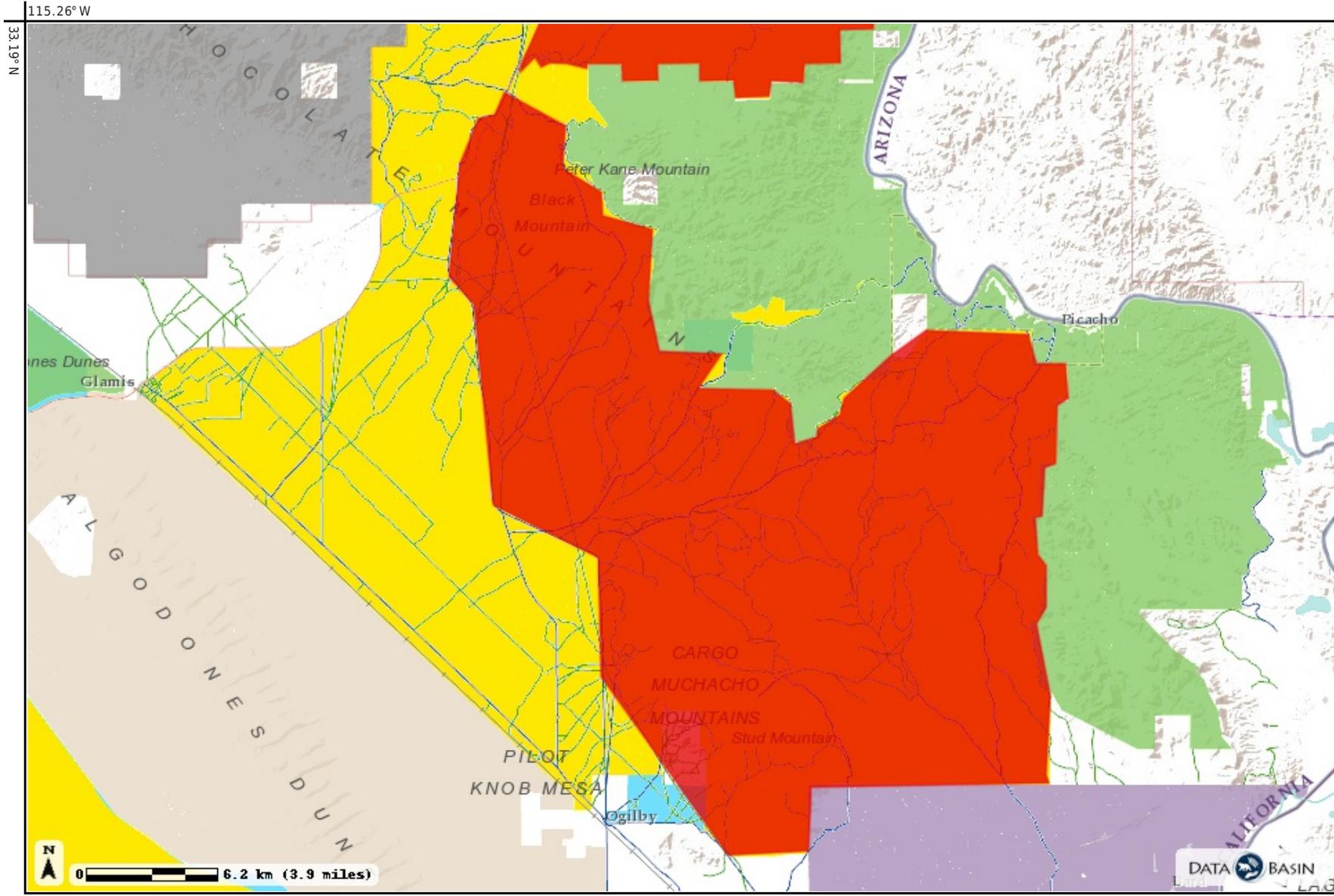
- Bureau of Land Management
- Forest Service
- National Park Service
- US Fish and Wildlife Service
- Military
- State Lands
- Private/Other
- Indian Trust Lands



1:40,000 at a page size of 34 in. by 44 in.

No warranty is made by the Bureau of Land Management (BLM). The accuracy, reliability, or completeness of these data for individual use or aggregate use with other data is not guaranteed.





Legend

Off-Highway Vehicle (OHV) Routes, Central and Southern California

Displaying: **Route Type**

- ATV
- Full Size
- MC
- Street Legal

- DRECP Boundary
- Development Focus Areas, Preferred Alt.
- Proposed Special Recreation Management Areas (SRMA), Preferred Alt.
- Proposed Extensive Recreation Management Area (ERMA), Preferred Alt.

Reserve Design Envelope (Existing Cons.), DRECP
Displaying: **Existing Conservation**

- Legislatively and Legally Protected Areas
- Military Expansion Mitigation Lands

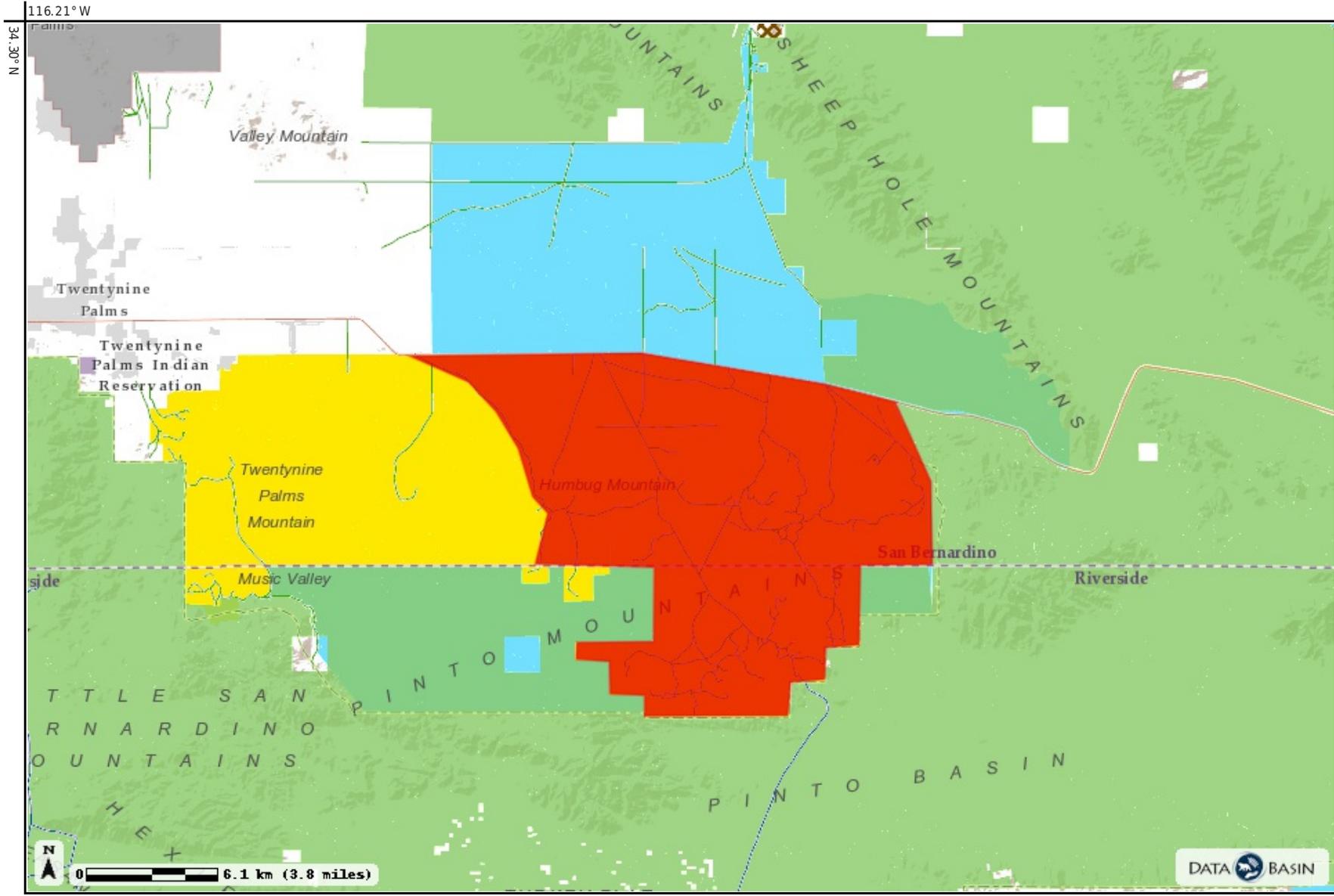
Reserve Design Envelope (NLCS), Preferred Alt.

- National Landscape Conservation System

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Attachment D



Legend

Off-Highway Vehicle (OHV) Routes, Central and Southern California

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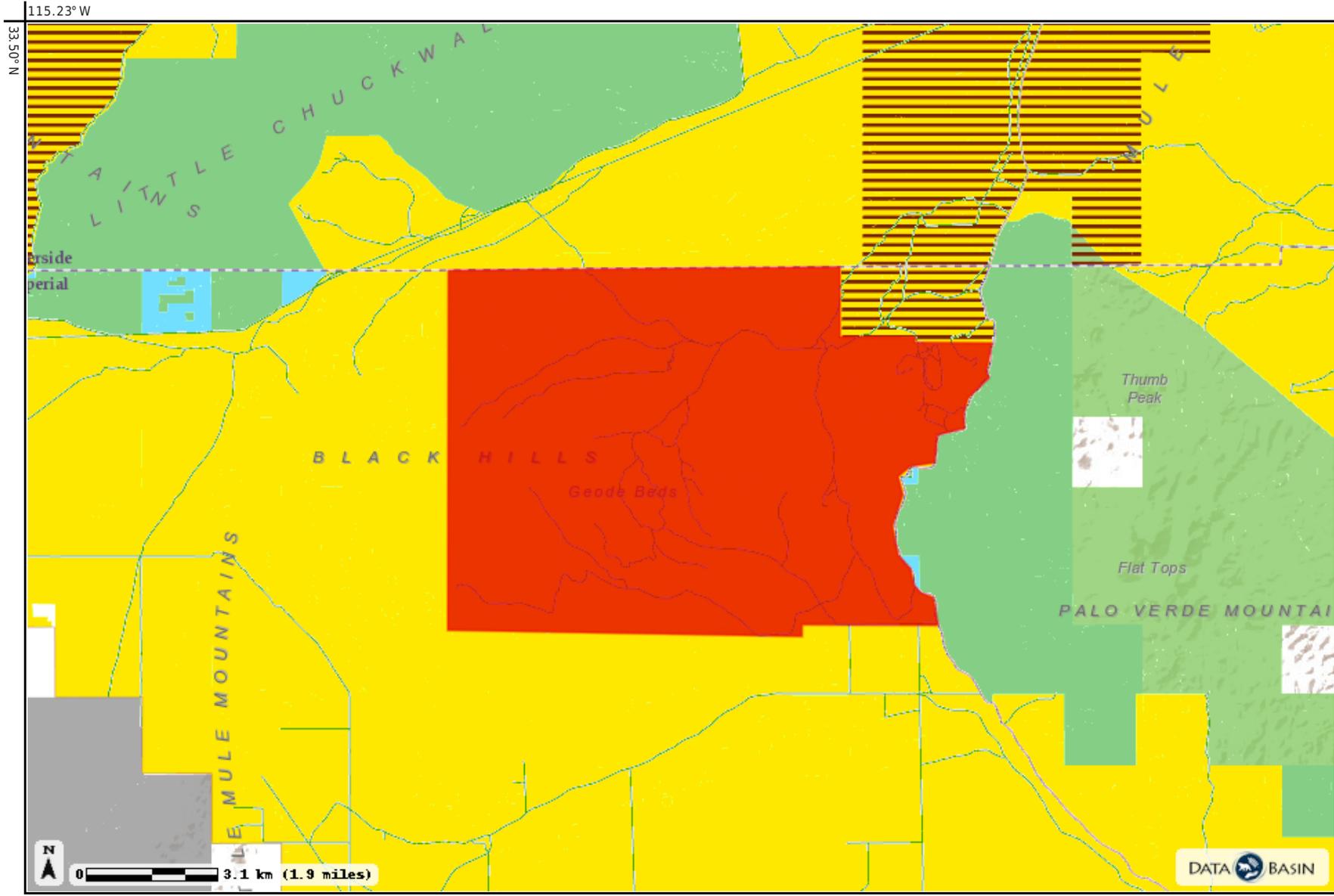
Reserve Design Envelope (NLCS), Preferred Alt.

- National Landscape Conservation System

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Attachment D



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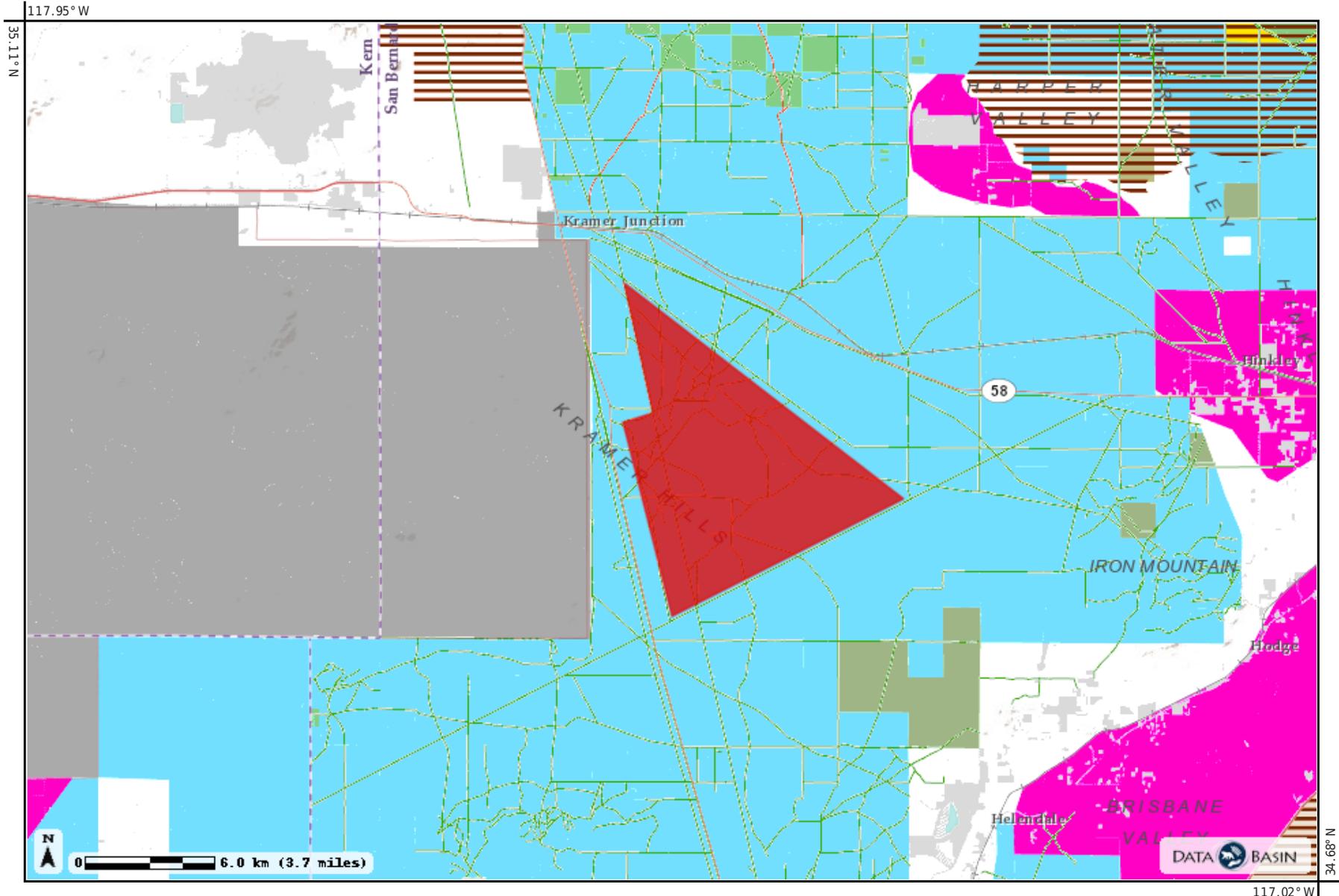
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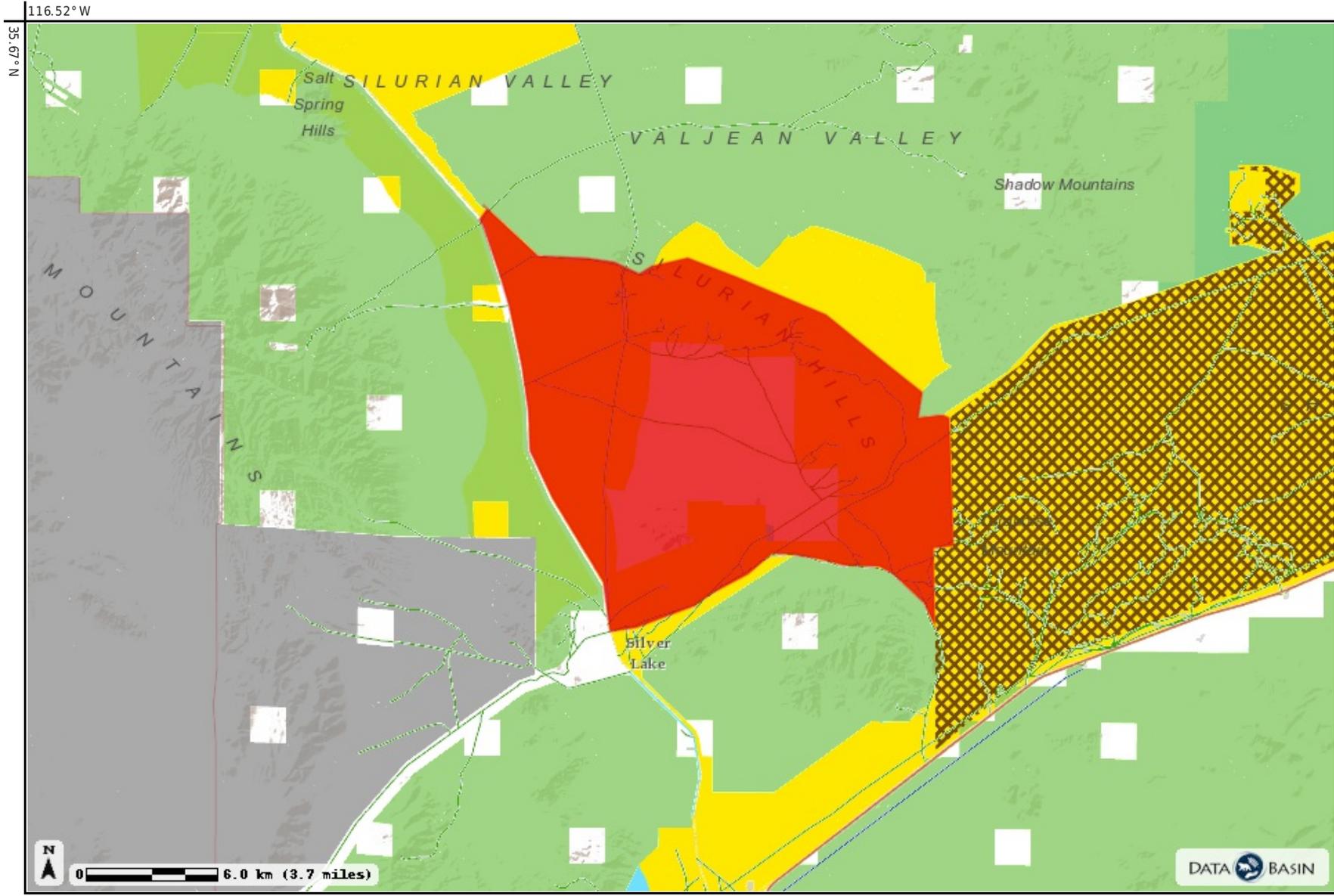
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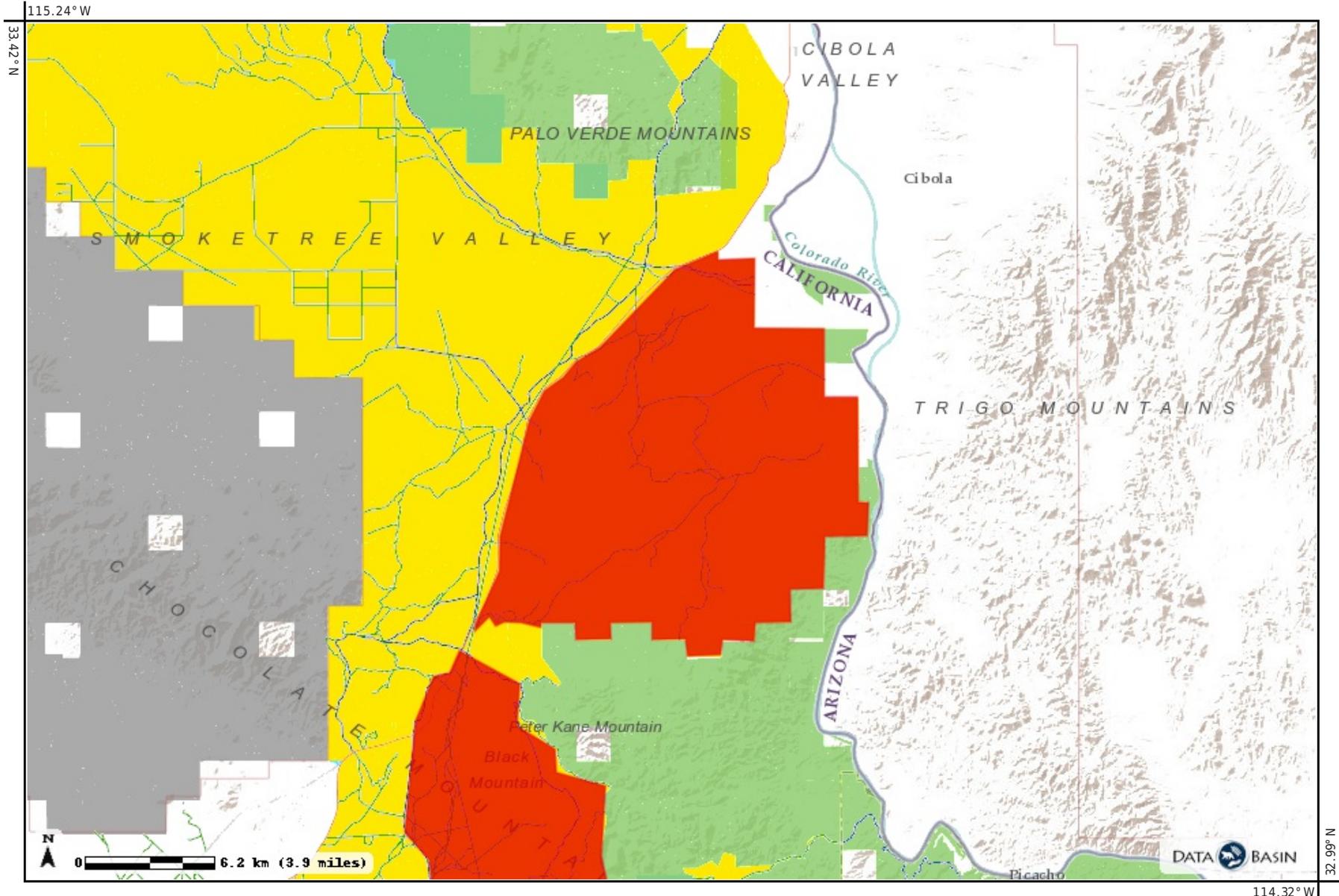
- DRECP Boundary
- Development Focus Areas, Preferred Alt.

- Other Lands, DRECP**
- Displaying: **T type**
- Impervious and Urban
 - Military
 - Tribal Lands
 - OHV Areas

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- ▨ Proposed Extensive Recreation Management Area (ERMA), Preferred Alt.

- Reserve Design Envelope (Existing Cons.), DRECP**
- Displaying: **Existing Conservation**
- Legislatively and Legally Protected Areas
 - Military Expansion Mitigation Lands

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Legend

Off-Highway Vehicle (OHV) Routes, Central and Southern California

- Displaying: **Route Type**
- ATV
 - Full Size
 - MC
 - Street Legal

- DRECP Boundary
- Development Focus Areas, Preferred Alt.
- ▬ Proposed Special Recreation Management Areas (SRMA), Preferred Alt.
- ▬ Proposed Extensive Recreation Management Area (ERMA), Preferred Alt.

Reserve Design Envelope (Existing Cons.), DRECP

- Displaying: **Existing Conservation**
- Legislatively and Legally Protected Areas
 - Military Expansion Mitigation Lands

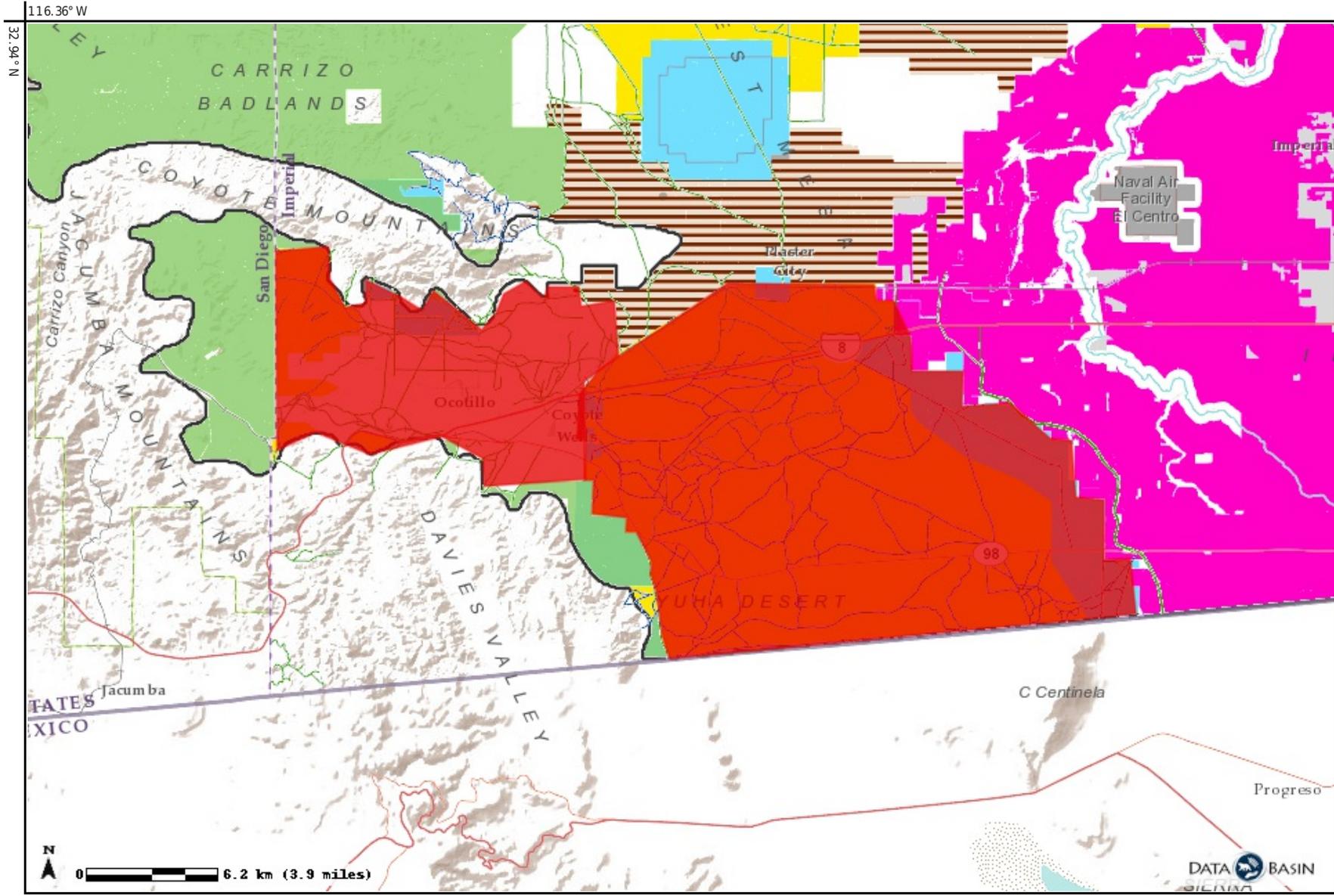
Reserve Design Envelope (NLCS), Preferred Alt.

- National Landscape Conservation System

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Attachment D



Legend

Off-Highway Vehicle (OHV) Routes, Central and Southern California

- Displaying: **Route Type**
- ATV
 - Full Size
 - MC
 - Street Legal

- DRECP Boundary
- Development Focus Areas, Preferred Alt.
- ▨ Proposed Special Recreation Management Areas (SRMA), Preferred Alt.
- ▨ Proposed Extensive Recreation Management Area (ERMA), Preferred Alt.

Reserve Design Envelope (Existing Cons.), DRECP

- Displaying: **Existing Conservation**
- Legislatively and Legally Protected Areas
 - Military Expansion Mitigation Lands

Reserve Design Envelope (NLCS), Preferred Alt.

- National Landscape Conservation System

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Attachment D

