



California Four Wheel Drive Association, Inc.

Over 55 years advocating for recreation

March 31, 2015

Tina Robinson
General Plan Project Manager
5172 Highway 78, #10
Borrego Springs, CA 92004

Email: info@planocotillowells.org

Carrie Simmons
BLM, El Centro Field Office,
661 S. 4th Street
El Centro, CA 92243

Email: BLM_CA_Ocotillo_Wells_RAMP@blm.gov

Planning Team:

The below comments are submitted on behalf of the California Four Wheel Drive Association (Cal4Wheel) and its individual members and member clubs. Cal4Wheel is a California association representing motorized recreationists and their families. While the main focus of Cal4Wheel is to protect, promote, and provide for motorized recreation opportunities on public and private lands, many of our members participate in multiple forms of recreation; including but not limited to hunting, fishing, camping, hiking, horseback riding, bicycle riding, and gem and mineral collection.

We recognized the positive health and social benefits that can be achieved through outdoor activities. We also recognize that motorized recreation provides the small business owners in the local communities a significant financial stimulus. And, our members are directly affected by management decisions concerning public land use.

The Cal4Wheel members subscribe to the concepts of: 1) public access to public lands for their children and grandchildren; 2) condition and safety of the environment; and 3) sharing our natural heritage. The general public desires access to public lands now and for future generations. Limiting access today deprives our children the opportunity to view the many natural wonders of public lands. The general public is deeply concerned about the condition of the environment and personal safety. They desire wildlife available for viewing and scenic vistas to enjoy. They also want to feel safe while enjoying the natural wonders. Lastly, the

public desires to share the natural heritage with friends and family today as well as in the future. How can our children learn about and appreciate our natural heritage when native species are allowed to deteriorate and historic routes are routinely blocked or eradicated from existence?

With these guidelines, the below comments were developed and are directed to the *Bureau of Land Management (BLM) General Plan/Recreation Area Management Plan/California Desert Conservation Area Land Use Plan Amendment (GP/RAMP/LUPA) and California State Parks Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the Ocotillo Wells SVRA*. However, this document shall not supplant the rights of other Cal4Wheel agents and organizational or individual members from submitting their own comments and the agency should consider and appropriately respond to all comments received.

Cal4Wheel generally supports the concept of the process to prepare a coordinated planning process between the Bureau of Land Management (BLM) and California State Parks to prepare a joint General Plan/Recreation Area Management Plan/California Desert Conservation Area Land Use Plan Amendment (GP/RAMP/LUPA) and Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS). Cal4Wheel encourages the public to send in both general and site-specific comments regarding this process.

Reviewing the Draft Preferred Alternative/Proposed Action reveals a glaring omission -- **SVRA Access**

The Ocotillo Wells SVRA (OWSVRA) covers a large geographic area with three major concentrations of recreation activities. In the south and west section of OWSVRA, a vast majority of recreationists originate from informal and commercial campgrounds and motor home parks south of Highway 78 and in open camping areas within the SVRA. All restaurants, repair shops, and gas stations serving the Ocotillo Wells SVRA visitors are likewise located south of Highway 78. As a result, during even moderate use periods there are significant numbers of unlicensed and unauthorized OHVs crossing the Highways and using the road shoulders at often random points.

Highway 78 is used regularly by commercial tractor/trailer units traveling at speeds in excess of 50 miles per hour. Large motor homes, many towing OHV trailers, travel along the Highway at widely varying speeds. As a result, an obviously hazardous and untenable condition exists as OHVs attempt to access and egress the SVRA.

On the east side of OWSVRA, recreation activity is concentrated either south of S-22 or to the north in the Ocotillo Wells North area. While S-22 is not used regularly by commercial tractor/trailer units, it does sustain considerable traffic volume with potential hazardous and untenable condition existing as large motor homes, many towing OHV trailers attempt to access and egress the SVRA.

Access to the Ocotillo Wells North area is primarily via North Marina Drive off Highway 86. Highway 86 regularly is used for commercial tractor/trailer units traveling at speeds in excess of 60 miles per hour. Large motor homes, many towing OHV trailers, travel along the Highway at widely varying speeds. As a result, the considerable traffic volume poses a potential hazardous and untenable condition as large motor homes, many towing OHV trailers attempt to access and egress the SVRA.

In addition, the North Marina Drive exit off of State Highway 86, is within a residential setting and the only access and egress to the Ocotillo Wells North area for large motor homes and trailers.

During development of the general plan, Cal4Wheel recommends that improvements be made to Highways to provide better traffic patterns to improve safety while attempting to access and egress the SVRA. And, within the Ocotillo Wells North area, Cal4Wheel recommends that an alternate entry point into the area be developed to divert recreation traffic from the residential area. An existing Imperial County plan provides for a network of public routes within the Ocotillo Wells North area with access available from S-22. Cal4Wheel recommends adopting and improving defined access points to relieve traffic congestion within the residential area.

Purpose of the Ocotillo Wells SVRA Plan

The current text defining the purpose of the proposed general plan states this plan will guide future and day-to-day decision-making and serve as the basis for developing feasibility and management plans, planning and implementing projects, and conducting other management actions. It further states the applicability to "...lands acquired by Ocotillo Wells SVRA after 1982 and lands managed by the BLM within the boundary of the Ocotillo Wells SVRA."

There are two point of consideration that require clarification. 1) Does this plan address SURFACE ESTATE as well as SUBSURFACE ESTATE? In other words, within the construct of "managing the lands", will surface activities be subject to interruption at the expense of exercise of mineral/resource extraction? 2) There are a number of private holdings within the boundaries of the planning area. Frequently, these private holdings have been acquired through willing seller or tax lien auction. As these new lands are acquired, are they to be brought into the management sphere of this proposed general plan? Or, will those acquisitions trigger another planning effort(s)?

Additionally, there are segments of lands within the proposed planning area that are held by other than California State Parks, BLM or private/corporate interests in the form of lands held by the State of California. Again, the applicability of this planning document to those lands is unclear and should reflect a greater clarity of application.

BLM and DRECP Interaction

The BLM managed sections within the planning area are within the area covered by the *Draft DRECP and EIR/EIS, in accordance with the National Environmental Policy Act (NEPA) (42 U.S.C. § 4321 et seq.) and California Environmental Quality Act (CEQA) (Cal. Pub. Resources Code, § 21000 et seq.)*. (Note: This planning effort has been subdivided to address the BLM Land Use Plan Amendment (LUPA) as a separate document.)

All action alternatives of the DRECP propose to designate BLM lands within the Ocotillo Wells SVRA as the Ocotillo Wells East Special Recreation Management Area (SRMA). A SRMA designation will allow the BLM to manage these lands with an emphasis on recreation, and the existing MOU with State Parks would continue. However, the alternatives also propose a geothermal-only Development Focus Area (DFA) overlay across most of the BLM parcels within this proposed SRMA within the boundaries of the general plan focus area.

Throughout the DRECP, renewable energy development is not allowed in a SRMA because it is not compatible with recreation. However, should a geothermal-only Development Focus Area (DFA) overlay a SRMA, geothermal development will be allowed with a "no surface occupancy" restriction, as is the case in the Preferred Alternative, Alternative 1, and Alternatives 3 and 4. Alternative 2, however, would break from this restriction and would allow geothermal energy development on these BLM parcels with surface occupancy.

Cal4Wheel recommends establishment of a "No Surface Occupancy" restriction for any geothermal development in the proposed Ocotillo Wells East SRMA (the area currently subject to the *Bureau of Land Management (BLM) General Plan/Recreation Area Management Plan/California Desert Conservation Area Land Use Plan Amendment (GP/RAMP/LUPA) and California State Parks Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the Ocotillo Wells SVRA.*

Overall, the proposed Ocotillo Wells General Plan includes a provision for a decision of whether or not to amend the CDCA plan to change the land use designation of some of the parcels within the planning boundaries which may include changes in some BLM parcels within the Ocotillo Wells planning area.

Additionally, the planning effort will also identify lands within the planning area to potentially be made available for lease or patent to the State of California through the Recreation and Public Purposes Act or other land transfer or disposal processes.

In about 1990, BLM and State of California began the process to accomplish this action. Cal4Wheel supports the continuation of the effort to manage the entire Ocotillo Wells SVRA as a contiguous SVRA with a consistent management plan for the entire area.

Summary of Draft Preferred Alternative

The Draft EIR identifies three OHV recreation zones and provides key words that are subjective in their interpretation - distributed, concentrated and trails-only. Additionally, their application to the three OHV recreation zones lack clarity and rational.

For example, the area north of S-22 is defined as a OHV Recreation Zone 2 and Trails-Only and Concentrated OHV Recreation where specific areas for "Concentrated OHV Recreation" may be identified in the future. This is an example of the lack of clarity and rational within the planning effort. The planing document provides no assurance that "Concentrated OHV Recreation" WILL BE identified in the future.

Cal4Wheel does not agree with the designation of a "Trails-Only OHV Recreation" within this zone (Zone 2, north of S-22). This particular area exhibits a unique geography that does not lends itself to a "trails-only" designation. The land is highly erodible and will change (and frequently does change) with each rainstorm within the area. Designation of trails may last a very short time before the "trail" is no longer in existence. Further, limiting designated trails to washes does not provide for a recreation experience desired by visitors. Designation as a "Distributed Recreation Area" also does not fall within the ever changing geography as designated trails cannot be dependable to be in existence from year to year.

Cal4Wheel recommends that the Zone 2 Area north of S-22 be designated as a Concentrated OHV Area.

Camping Zones

As with OHV Recreation Zones, three Camping Zones have been established; again, with a lack of clarity and rational within the planning effort.

For example, Camping Zone 2 is Limited Camping and only within a “trails-only” designated OHV area. And, again, Camping Zone 2, north of S-22 has a confusing designation overlay. By definition, that area may also accommodate Concentrated OHV Recreation. This puts Camping Zones and OHV Recreation Zones in direct conflict.

Typically, the region locally known as the “Bluffs”, directly off of S-22 on the north side, has been used as a camping area where visitors will access the OHV Recreation Zone 1 area south of S-22. Under current definitions, this area could no longer be used for camping.

Additionally, Zone 3 is designated as a “No Camping” zone. This is a short-sighted decision; especially in the Zone 3 region north of Devils Slide and adjacent to Anza Borrego Desert State Park. This is one area where a dispersed/primitive camping with tent/vehicle only should be allowed. There are numerous “expedition” style trips made through ABDSP and that specific region has historically accommodated the overnight dispersed camping opportunity desired by those small groups.

Overall, the Camping Zones provide severe limitations with respect to the associated OHV Recreation Zones. And, the ability for primitive, dispersed camping suffers within the scope of this proposed general plan.

Cal4Wheel recommends:

- 1) The Camping Zone north of S-22 be included as a Semi-Developed Camping Area.
- 2) Dispersed/Primitive camping be allowed within Zone 3 areas to accommodate small transient groups of recreation for overnight camping opportunities.

Special Event Staging Areas and Special Events

While proposed plan language does provide for a definition of OHV Rides and Other Special Events, the descriptions are incomplete. And, with respect to OHV events, the proposed action indicates that areas are identified where OHV events **MAY** be allowed in the future.

There is no distinction in the discussion that clearly identifies the difference between “OHV events” and “Special Events”. In fact, the proposed action allows “California State Parks Sponsored Special Events Only”.

Cal4Wheel disagrees with this position and recommends that State Parks define OHV Events and Special Events with clarity or consider them co-equal and managed in accordance with California State Park Event Permit requirements.

Resource Management

The overlay identified as *Figure 3G: Resource Management* defines existing and planned resource protection and restoration areas with a qualifier that not all areas within the Resource Overlay Zone are necessarily sensitive and in need of protection. The Resource Overlay Zone is problematic when compared with the Preferred Alternative where OHV Recreation and Camping are expected to occur.

For example, in the Ocotillo Wells North area, the area defined for Focused Development Areas are within boundaries for Resource Management. The area south of S-22 and west of the Truckhaven 4x4 Track is identified as an area for concentrated recreation and resource management. Additionally, large segments of area defined for Concentrated OHV Recreation are also within boundaries of areas defined for resource management.

One noted conservation management strategy is adhering to the Soil Conservation Standard Guidelines for Off-Highway Vehicle Recreation Management to limit soil erosion and water runoff and staying on designated trails is encouraged.

While that is a noble standard, it is a “guideline”. As previously stated, this particular area exhibits a unique geography that does not lend itself to a “trails-only” designation. The land is highly erodible and will change with each rainstorm within the area. Designation of trails may last a very short time before the “trail” is no longer in existence. Further, limiting designated trails to washes does not provide for a recreation experience desired by visitors. Designation as a “Distributed Recreation Area” again does not fall within the ever changing geography as designated trails cannot be dependable to be in existence from year to year.

There are several springs within the boundaries of the planning area and Cal4Wheel agrees that those deserve protection. However, other actions to limit erosion are questionable as to their effectiveness as there are no “free-flowing waters” (other than the few noted springs).

The unique qualities that create the desirable recreation experience within Ocotillo Wells SVRA are the very areas created by erosion with each storm in the region.

The region covered by this planning effort is a popular destination spot for multiple forms of recreation; including but not limited to, four wheel drive touring/driving for pleasure, rockhounding, photography, and wildlife viewing. These are activities that cannot be enjoyed, or replicated, in that diversity in other regions.

OHV recreation has been the fastest growing form of recreation in recent years. More members of the public are seeking a recreation opportunity and public lands are a destination for that opportunity. Cal4Wheel is concerned with the scope and magnitude of the proposed Ocotillo Wells SVRA General Plan and its potential to restrict public access to public lands that have been set aside as State Vehicle Recreation Areas.

Cal4Wheel recommends that the Ocotillo Wells SVRA remain a concentrated OHV recreation area to the maximum extent practicable. Cal4Wheel agrees with and endorses the concept of identifying a network trails (washes) that can provide a self-guided tour experience that links the unique geographic features of the SVRA. For many visitors, this would address a desire for scenic photography and driving for pleasure.

As potential geo-thermal energy development is possible within the boundaries of the planning area, Cal4Wheel recommends that such production facilities be constructed with limited to no surface occupancy. In all cases, loss of open lands, or access to lands, for disbursed recreation opportunity, should be mitigated to provide for appropriate and reasonable access for lost recreation opportunities.

Where necessary, mitigation shall include the development of alternative routes to allow for continued vehicular access, with similar recreation experience. In addition to continued access, mitigation shall include construction of an OHV touring routes which circumvents any closed areas and allows for directional and interpretive signs to be placed at strategic locations along the route to maintain a contiguous travel network.

Cal4Wheel appreciates the opportunity to comment on these important plans. Cal4Wheel is eager to assist land managers to formulate balanced and enforceable land use plans and we hope these comments have been helpful in beginning your journey. We understand comments such as these are not as clear or concise as they could be. Please do not hesitate to contact John Stewart, (619) 508-8840 if you have any questions or require clarification.

Thank-you,

A handwritten signature in black ink that reads "John Stewart". The signature is fluid and cursive, with the first name "John" and last name "Stewart" clearly legible.

John Stewart
Natural Resources Consultant
California Four Wheel Drive Association