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Boris Sanchez, Project Manager
California Public Utilities Commission
C/O ECORP Consulting, Inc.
215 North 5th Street
Redlands, CA 92374
Submitted via Email: CEQA@IronwoodTransmissionProject.com

Derek Eysenbach, Project Manager
Bureau of Land Management
Yuma Field Office
7341 E. 30th Street
Yuma, AZ 85365
Submitted via Email: deysenbach@blm.gov

RE: Proponent's Environmental Assessment for Horizon West Transmission, LLC Ironwood Transmission Line Project

The California Off-Highway Motor Vehicle Recreation (OHMVR) Commission has recently become aware of the proposed Ironwood Transmission Line Project that will cross lands administered or managed by the Bureau of Land Management (BLM), Bureau of Reclamation, California State Parks and Recreation, and other jurisdictions that may have significant temporary and permanent impacts to the Off Highway Vehicle (OHV) transportation system, particularly in the BLM Imperial Sand Dunes Recreation Management Area (RMA), Heber Dunes State Vehicular Recreation Area (SVRA), and other areas within the California Desert Conservation Area.

The OHMVR Commission serves as the public interface between the OHMVR Division and OHV recreationalists in California. Given the proposed alignment of the project through multiple OHV recreation destinations, the Commission welcomes and encourages the project proponents, the California Public Utilities Commission and the Bureau of Land Management to present the project to the Commission at an upcoming commission meeting. In previous meetings, the Commission heard the public's concerns about the Ironwood Transmission Line project and the potential impacts to recreational, natural and cultural resources, and would appreciate the opportunity to learn more about it.

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The Commission recognizes California's need to maintain and modernize a safe, reliable, and resilient electric transmission system. However, the Commission also believes that recreation resources, public access, scenic landscapes, and outdoor recreation economies are significant public assets that deserve balanced consideration throughout infrastructure planning, environmental review, construction and operation.

The Commission is concerned that a 500kV transmission line through the California Desert Conservation Area, Imperial Sand Dunes RMA, and Heber Dunes SVRA would bring permanent industrial infrastructure into a landscape specifically valued for its natural character. Transmission towers (150-200' tall), associated access roads, staging areas, construction traffic, temporary and permanent impacts to the OHV transportation network, and long-term operation of high-voltage transmission corridors have the potential to fragment recreation landscapes, diminish scenic quality, alter visitor experiences, and permanently change the primitive character that makes the California Desert Conservation Area unique.

California's outdoor recreation economy further underscores the importance of protecting these resources. Outdoor recreation contributes more than $81 billion annually to California's economy, supports more than 545,000 jobs, and provides substantial benefits to rural communities, tourism, hospitality businesses, equipment retailers, outfitters, and local service industries. Recreation landscapes such as Imperial Sand Dunes RMA and Heber Dunes SVRA are not simply open space - they are economic assets that contribute to California's quality of life and long-term economic vitality.

The Commission is particularly concerned that recreation resources often receive less comprehensive analysis than engineering, biological, cultural, or utility considerations during infrastructure planning. Recreation access, scenic quality, visitor experience, outdoor tourism, and the cumulative effects of industrial development deserve the same thoughtful evaluation afforded to other public resources.

The Commission recommends:

- The CPUC and BLM should brief the OHMVR Commission regarding the Ironwood Project, the anticipated timeline, current status, and

provide the Commission and OHV stakeholders with project mapping showing the relationship between the transmission corridor, existing OHV routes, access roads, staging areas, and recreation facilities.

- Consult with OHV affected organizations, including industry associations before the draft EIR/EIS analysis is finalized.

- Conduct a comprehensive OHV transportation network connectivity impact analysis – route by route -addressing the status of BLM routes, informal and established routes, utility/access roads open to the public, routes connecting staging and camping areas, routes connecting highways and recreation destinations, routes that would be used for construction access, routes subject to temporary restrictions, routes that could become restricted due to maintenance, routes where project activities could create safety conflicts.

- The project construction, operation, and maintenance activities must account for seasonal and event-related concentrations of OHV use within the California Desert Conservation Area.

- Continued public access to the California Desert Conservation Area is a critical concern. Construction, operation, maintenance road closures, or detours must be evaluated for legality, vehicle accessibility, safety, distance, terrain, seasonal availability, connectivity, capacity, compatibility with different types of OHVs, and whether the closures or detours provide equivalent recreational access.

- Significant and unavoidable visual impacts to recreational resources are identified in the preliminary project environmental documents. The Imperial Sand Dunes RMA, Tamarisk Long Term Visitor Area and Mittry Lake will be significantly and permanently alter the recreation experience for thousands of visitors. The project team should review alternatives to minimize and mitigate the visual effects of the project, such as structure placement, alignment, color and design, vegetation treatment, and other measures that can reduce visual contrast from recreation areas and OHV travel corridors.

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- Continuing meaningful coordination with California State Parks, the OHMVR Division, local governments, tribal governments, recreation organizations, tourism interests, and the recreating public throughout project planning and environmental review.

The Commission supports thoughtful infrastructure planning that balances California's energy needs with the long-term protection of its public recreation system. Recreation resources should not become unintended collateral impacts of infrastructure development when reasonable alternatives and mitigation measures are available.

The Commission appreciates the project team's engagement with agencies and stakeholders to date and further appreciates the opportunity to provide these comments and looks forward to continued participation as the Ironwood Transmission Project advances through the public participation and environmental review process.

Respectfully submitted,

Diane Ross-Leech, Chair
California Off-Highway Motor Vehicle Recreation Commission

cc: OHMVR Commissioners
Armando Quintero, Director
Liz McGuirk, Chief Deputy Director
Sarah Miggins, Deputy Director OHMVR Division
Alex, Stehl, Deputy Director Strategic Planning and Recreation Services Division
Ronald Wildermuth, Ocotillo Wells District Superintendent
Ray Lennox, Anza Borrego District Superintendent
Anza Borrego Foundation, Briana Fordem, Executive Director
info@theabf.org
California State Parks Foundation, rachel@calparks.org
County of San Diego, Board of Supervisor Jim Desmond, District 5
CA State Park and Recreation Commission,
SPR.Commission@parks.ca.gov
CA State Park Rangers Association, Steve Ptomey, President
Steve.Ptomey@parks.ca.gov
Borrego Village Association, BorregoVillage@gmail.com

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Tubb Canyon Conservancy, Dave Garmon, President,
email.our.team@tubbcanyondesertconservancy.org
Tommy Alexander, SR Regulatory Analyst, CEQA & Energy Permitting,
CPUC, Tommy.Alexander@cpuc.ca.gov

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