

## *Public Lands*

### *BLM asks Rockhounds to define hobby for the Mojave Trails National Monument Plan*

*by Lisbet Thoresen, SDMG public lands representative*

**T**HE Bureau of Land Management (BLM) recently hosted four public meetings to explain the type of information it needs from the public to draft a Monument Management Plan (MMP) for **Mojave Trails (MTNM)**. Rockhounds made a strong showing at the meetings. Good! About 70 of the 90 participants at the Zoom virtual meeting held on May 24th were rockhound advocates, and about 40 more attended the Barstow in-person meeting.

#### **The devil is in the details**

BLM's message to Rockhounds is: "You need to define your activity and describe in detail your values and process." In other words:

- What do you collect and why?
- Where do you go and how do you get there?
- How do you collect (tools and techniques)?

It is important to make clear to the BLM that our recreational hobby **is** a low-impact, non-commercial activity and **is not** prospecting or mining (see: [bit.ly/blm-mining-minerals](https://bit.ly/blm-mining-minerals) and [on.doi.gov/3OYr2bo](https://on.doi.gov/3OYr2bo)). Currently, regulations tailored to mining is the guidance applied to casual collecting. This may seem absurd to most Rockhounds, but BLM needs to draft language in the MMP that explicitly differentiates rockhounding (casual collecting) from mining. There are going to be rules. Let's help the BLM create a good model for hobby collecting in a national monument.

#### **Two things you can do right now**

Anyone who cares about preserving hobby collecting as a recreational activity in Mojave Trails should submit a personal comment letter to the BLM by June 20, 2023 (see box at right for where to send your written comments). Please encourage your club or organization to sign onto a group letter. SDMG is in the process of drafting a letter, which will be ready for review shortly. Email [editor@sdmg.org](mailto:editor@sdmg.org), if you or your organization would like to sign onto it.

### **Comment Period Open for Mojave Trails Natl Monument Public scoping**

**Public comment deadline:  
June 20, 2023**

Substantive written comments may be submitted anytime through June 20, via mail at:

**ATTN: Mojave Trails National  
Monument Planning c/o**  
Needles Field Office, 1303  
S.U.S Hwy 95, Needles, CA 92363

~ Or via email ~

[BLM\\_CA\\_NFO\\_MTNM\\_PLANNING@blm.gov](mailto:BLM_CA_NFO_MTNM_PLANNING@blm.gov)  
or [BLM\\_CA\\_NFO\\_MTNM\\_PLAN@blm.gov](mailto:BLM_CA_NFO_MTNM_PLAN@blm.gov)  
*Include the project name (MTNM Plan) in the  
subject line of your email.*

*Be sure to save a copy of your letter.*

The BLM will consider all substantive public comments in preparation of the analysis, which will be made available for public review on the BLM's National NEPA website. For more info visit:

[https://eplanning.blm.gov/eplanning-ui/  
project/2022347/510](https://eplanning.blm.gov/eplanning-ui/project/2022347/510)

~ or short URL ~

[bit.ly/mtnm-mmp-rmp-ea](https://bit.ly/mtnm-mmp-rmp-ea)

The BLM intends to prepare a Monument Management Plan (MMP) for the Mojave Trails National Monument (MTNM), through amendments to the California Desert Conservation Area (CDCA) land use plan and an environmental assessment (EA). The BLM needs to modify some of the existing CDCA land use plan decisions and make implementation-level decisions for the MTNM.

**Some suggestions**

about what to include in a comment letter

**BLM made a commitment to the public regarding its vision for Mojave Trails when the ROD was published in 2016.** According to BLM, a monument management plan for Mojave Trails would serve as a model for other monument management plans in the future. Rockhounds were assured the plan for MTNM would accommodate uses that have been disallowed elsewhere in the past, notably hobby collecting. Please stay true to the original intent for Mojave Trails.

**Include explicit language stating that amateur rock collecting/rockhounding is a permissible recreational activity within the monument.**

**Define terms/synonyms for rock collecting** (e.g., hobby, casual, or amateur collecting, rockhounding) as a low-impact recreational activity.

**Rockhounding is not mining and should not be administered according to the same criteria.** It is not archaeology, nor is it a wantonly destructive activity. A final rule for the **Paleontological Resources Act (PRPA)** is a useful model for some of the same issues BLM will confront in drafting a plan for MTNM. The final PRPA rule (August 2, 2022) provides constructive reference that the Bureau itself recognized as reasonable guidance for defining collecting activities and processes, e.g., the type of tools and how they are used. They may be reasonably extended to amateur collecting of rocks and minerals, which are regarded as less fragile and less rare than non-vertebrate paleontological resources. (For a review of the PRPA rule and its potential implications for Rockhounds, see **A. Hoekstra’s** article from September 2022: [https://bit.ly/PRPA-rule\\_202209](https://bit.ly/PRPA-rule_202209). Consider the Bureau’s responses to public comments and changes the agency made to the Act as a result (34 pp.): <https://bit.ly/FR-PRPA-20220802>)

**Hobby collecting is not incompatible with conservation values regarding habitat for flora and fauna.** Rockhounds enjoy the desert for its beauty, not only for its rocks. Responsible hobbyists

**Mojave Trails National Monument  
Countdown to  
a Final Management Plan**

National monuments belong to everyone in the U.S. Rockhounds everywhere need to get involved. **Got questions? Want to sign onto a joint letter?** Contact Lisbet at [editor@sdmg.org](mailto:editor@sdmg.org).

Join SDMG’s mailing list to stay abreast of public lands-related news. Longform articles and reports appear in the monthly bulletin (September – June).

Check the topics that interest you, including “public lands” to receive public lands-specific updates. If you would like to join a comment letter on the current public scoping for Mojave Trails, check the box for “Mojave Trails Natl Monument” – we’ll let you know when a draft letter is ready for review, probably by June 8.

<http://bit.ly/sdmg-signup>

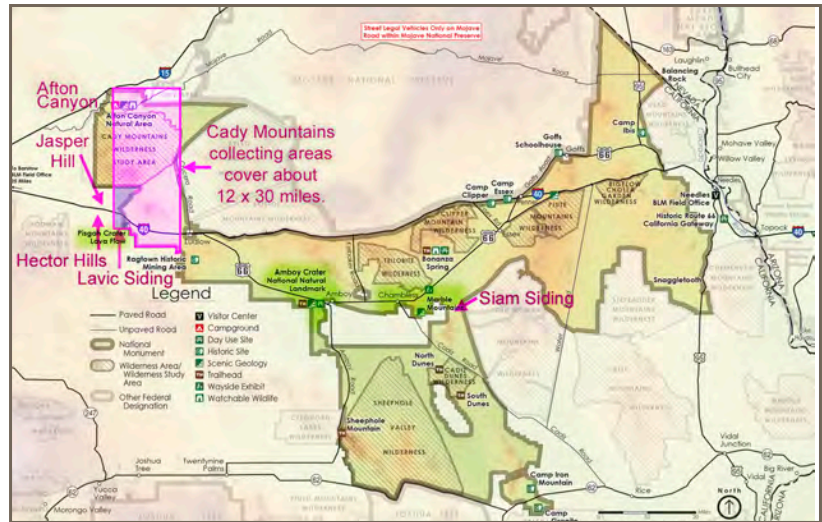
**Planning Schedule for MTNM through ROD**

Fall/Winter 2022	Notice of Intent
Summer 2023	Draft MMP / EA
Winter 2023	Proposed MMP / Final EA
Summer 2024	Approved MMP / ROD

adhere to the **AFMS code of ethics** ([https://www.amfed.org/land\\_use\\_policy.htm](https://www.amfed.org/land_use_policy.htm)). Many resources, such as the agate found a Lavic Siding are replenished by seasonal storms, while others are alternately exposed and then effaced by natural weathering processes.

**Recognize the customs and culture of the land concerning rockhounding in the Mojave Desert.** Many rock collecting areas located within the footprint of the Desert District and which are now part of the monument have been popular dating back to the 1930s and ’40s (earlier for some localities).

Many longtime collecting areas are concentrated in the Cady Mountains (highlighted) in the Mojave Trails National Monument, but there are many other collecting areas elsewhere in the monument, e.g., Siam Siding. Others are located just outside but near the monument's boundaries. Source: BLM, with annotations by L. Thoresen.



**Describe your values,** e.g., educational value, recreation, having meaningful experiences over shared interests with friends and family, building a sense of comraderie and community.

**Pack in–pack out.** An important value – leave no trace.

**Describe how often you go on field trips and with whom,** e.g., friends or trips organized by gem-mineral clubs. Do you camp overnight or stay in hotels in gateway communities?

**Describe the hands tools and methods you use.** Don't forget to describe care to back-fill shallow trenches and holes.

**Ask BLM to incorporate language that codifies longstanding historical practice in the area between BLM and Rockhounds, which BLM has acknowledged exists.** Existing travelways including primary and secondary roads/trails, should be preserved. Access to collecting areas should not be restricted by gates and fences including secondary roads. Staging areas should be available. Access means that reaching a collecting site should not require hiking further than 1/4 mile from a staging/parking area. (Many Rockhounds are youngsters and seniors.)

**Some of the historically most significant collecting areas are located in a 12 × 30 mile area in the**

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“Rockhounding in the California Desert District has been a family activity and hobby for generations of Californians. The BLM is committed to focusing on rockhounding, and other recreational activities, in the development of the management plan for Mojave Trails National Monument. Input from the rockhounding community will be essential in helping us identify appropriate management actions that balance access with resource protection.”

– Kyle Sullivan  
former manager,  
Mojave Trails National Monument

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**Cady Mountains.** BLM is aware of this. However, BLM needs a lot of detailed input about other areas, including routes Rockhounds use to get to them.

**DRECP changed Development Focus Areas (DFAs) where access to collecting areas might be inhibited.** Please do same for MTNM. Also, DRECP did not sacrifice a single collecting area requested by Rockhounds.

**Include historical references,** e.g., guide books, mindat.org, etc. Maps and drawings too!

**BLM needs input about collecting areas with invertebrate fossils.** See previous comment above regarding PRPA.