



San Diego Mineral & Gem Society, Inc.

A Non-Profit Educational & Scientific Organization
1770 Village Place, Balboa Park, San Diego, CA 92101-1651
Founded 1934

March 22, 2018

* DRECP moved the comment letters archive. A copy of **SDMG's 2015 letter** is available online at:
<https://bit.ly/sdmg-drecp-ltr-2015>

VIA EMAIL (BLM_CA_DRECP@blm.gov)
Mr. Jerome E. Perez
BLM-California State Director
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Re: FR Doc. 2018-02098 – “Notice of Intent to Amend the California Desert Conservation Area, Bakersfield, and Bishop Resource Management Plans and Prepare Associated Environmental Impact Statements or Environmental Assessments,” issued by the Bureau of Land Management on February 2, 2018

Exhibit 1: Incorporate by reference the comment letter (48 pages) of February 21, 2015, prepared by San Diego Mineral & Gem Society, Inc. (“SDMG”) on DRECP NEPA/CEQA [Docket: 09- RENEW EO-OI] which was submitted to the California Energy Commission on February 23, 2015 and is available online at the Desert Renewable Energy Conservation Plan (“DRECP”) website at:

* http://www.drecp.org/draftdrecp/comments/San_Diego_Mineral_and_Gem_Society_comments_2015-02-21.pdf. (Hereafter “Exhibit 1” or “SDMG’s 2015 letter”)

Exhibit 2: maps – figs. 1a, b and 2 (annotated)

Exhibit 3: Incorporate by reference the statement (1 page) released on March 5, 2018, by California Resources Secretary John Laird on opening the Desert Renewable Energy Conservation Plan to review, available online at the California government website at: <http://resources.ca.gov/wp-content/uploads/2018/03/DRECP-Statement-Press-Release.pdf>. (Hereafter “Exhibit 3”)

Dear Director Perez:

This letter is submitted to the Bureau of Land Management (BLM) on behalf of the San Diego Mineral & Gem Society, Inc. (SDMG), a non-profit educational and scientific organization, together with other hobby collecting and public lands advocates (“Rockhounds”) throughout the United States. SDMG is a member of the California Federation of Mineralogical Societies (CFMS), which has approximately 110 member societies, and the American Federation of Mineralogical Societies (AFMS), which is an educational federation of affiliate gem-mineral-lapidary societies and seven similar regional organizations, including CFMS. SDMG has 770 dues-paying members.

First, we would like to thank BLM for creating/expanding new recreation designations (ERMAs and SRMAs) and accommodations made for hobby collecting in the Record of Decision for the Desert Renewable Energy Conservation Plan Land Use Plan Amendment (DRECP ROD), signed on September 14, 2016. Like other similar societies in California and elsewhere, SDMG's membership includes many avid rockhounds who have enjoyed hobby collecting in California's deserts for many decades. BLM recognizes hobby collecting as a low impact recreational activity, and we appreciate the serious consideration given to concerns expressed in the many comment letters submitted in 2015 by all Rockhound advocates on DRECP NEPA/CEQA (Docket: 09- RENEW EO-01) (hereafter "Draft DRECP").

Issues important to Rockhounds in the past and now. In SDMG's comment letter of February 21, 2015, [Exhibit 1], we were especially concerned about 1.) some rock collecting areas overlapping or located adjacent to areas targeted for potential renewable energy development project, most designated as Development Focus Areas (DFAs); 2.) overlaps with Areas of Critical Environmental Concern (ACEC); and 3.) some rock collecting areas that should have been, but were not, designated as Special Recreation Management Areas (SRMAs).

On September 13, 2016, during a conference call initiated by DRECP administrators, with members of the Rockhound community participating, BLM's Vicki Campbell reported that revisions were made to DFAs and other areas of potential development in the DRECP ROD, noting that these changes were made specifically in response to numerous detailed comment letters that DRECP received from Rockhounds. [Exhibit 2, figs. 1a, b] The DRECP ROD reflects consideration for hobby collecting areas – and our concerns about having vehicular access to them. We appreciate the changes made to the ROD.

We strongly oppose any further changes, especially those that may come at the expense of recreational users. In the light of the current Review for which BLM now contemplates amending DRECP "to seek greater opportunities for renewable energy generation," we are concerned that the DFAs (and other prospective target areas) in the DRECP ROD may revert to the DFAs (and other "study" or similar areas) proposed in the 2014 Draft DRECP. [See: Exhibit 2, fig. 1a, fig. 2] From the perspective of recreational users, we worry that future changes may be even more regressive. Therefore, we respectfully remind BLM about the many comment letters submitted from Rockhounds which influenced the DRECP ROD.

We ask BLM to refer to SDMG's 2015 letter [Exhibit 1], which contains many comments that remain applicable for the current Review, including details related to:

- Collecting areas: Afton Canyon, Blythe, Boron, Brown Butte, Cadiz (Siam Siding), Cady Mountains (a 12 × 30 mile area), Chambless, Cinco, Gem Hill, Hector Hills, Hauser Beds, Kramer Junction, Lavic Siding/Jasper Hill, Newbury, Rainbow Rock, Sperry Wash, Stoddard Wells, Yermo, Yuha Basin.
- Results of a 2014–15 survey from 186 Rockhound respondents who described the importance of California's deserts to them. The survey results also present details about what they do, where they go, how frequently, etc.

Deleterious impacts to gateway communities. If the current Review goes forward, we are concerned that revisions may produce adverse economic and quality-of-life impacts on businesses and service providers that rely on tourists and recreational visitors to gateway desert communities. The survey results presented in SDMG's 2015 letter provide details about field trips to the desert (frequency, destinations, etc) and the services and businesses patronized by the survey respondents.

The survey shows reciprocal benefits – the contribution Rockhounds make to local economies and the essential services visitors derive from gateway community businesses.

Mojave Trails National Monument (MTNM). [Exhibit 2, fig. 2] Please note that some collecting areas cited in SDMG’s 2015 letter may now lay within the boundaries of the monument, which was created on February 12, 2016. Should the Department of Interior/BLM contemplate reducing the size of the monument in the future, we ask the department/agency to honor accommodations made for hobby collecting and vehicular routes of access to collecting areas prior to the national monument designation and during the MTNM management plan drafting process. This explicit accommodation was posted on the BLM website on May 13, 2016. The issues of concern to us include not only hobby collecting areas and vehicular access to them, but also preservation of viewsapes of significant geological features which include but are not limited to Amboy and Pisgah Craters, Marble Mountains, as well as historically/culturally significant areas, especially along Historic Route 66.

The DRECP ROD includes an ACEC that overlaps a large collecting area in the Cady Mountains (12 × 30 miles). Since the ACEC designation does not preclude accommodation for hobby collecting, opening the DRECP to review is not needed to clarify such accommodation. However, if the current Review goes forward, we respectfully request an explicit accommodation for hobby collecting in this area, whether it is incorporated into the final management plan for MTNM or superseded by amendment made to DRECP.

Many sites and routes of access to collecting areas already exist in BLM’s West Mojave Route Network Project (WMRNP) database. (Many, but not all, entries were logged by Kim Erb, former DAC member.) We ask that these data will be incorporated into any monument management plan or DRECP implementation contemplated.

We question both the need and the practicality of amending the DRECP, which is finally being implemented – 9 ½ years after its inception.

Ambitious production goals set in 2014 are already being met, even exceeded. By the end of 2014, California had already met its self-imposed sustainable energy goal based on renewables by 2020. As a result, the target was revised to 50% renewables by 2030. Secretary Sally Jewell announced at the ROD signing ceremony on September 14, 2016 that BLM planned on fast-track permitting 500 renewable energy projects over the next 10 years. Now, in 2018, California is on its way toward achieving BLM’s ambitious target, propelled by implementation of the DRECP ROD. Since 2017, some projects are being hastened with environmental review waivers.

On February 7, 2018, Karen Douglas, Commissioner of California Energy Commission and a principal involved in drafting the DRECP and calculating California’s renewable energy needs, told the L.A. Times that amending the DRECP was not necessary, saying, “We have sufficient land designated in this plan to support meeting our renewable energy goals.” Surely, Industry advocates cannot credibly complain today that the ROD is unfair, imbalanced, or in need of emendation to meet California’s energy goals.

Opening the DRECP to Review risks endless bureaucratic upheaval, unnecessary expense, and wasted time. We agree with John Laird, California Secretary for Natural Resources: “The Plan itself allows for modifications and course corrections, and due to the combined input, resulted in zero lawsuits. Reopening the plan is a waste of time and resources that will result in uncertainty, delay, and litigation.” [See Exhibit 3 for the full letter]

After eight years and 16,000+ comment letters later, the DRECP ROD was the product of an arduous, contentious, and complicated effort to achieve balance over conflicting values among many stakeholder groups, including conservation, recreation, industry (utility-scale developers), existing energy utility providers (e.g., PG&E), and others. Delivering the DRECP ROD was a herculean effort. It required negotiating successfully with no fewer than 49 California tribes to deconflict their interests. Implementation is still complicated by the WMRNP LUPA and SEIS, another multi-year effort, for which an inaugural proposal under the DRECP was only recently opened to public comment, on March 16, 2018, with the comment period ending on June 14, 2018.

The DRECP ROD was a compromise for all, including Rockhounds. Let's move forward.

We strongly oppose any further changes to DRECP at this time. We think it would be far more productive for ALL, if BLM would instead focus on achieving previously agreed upon goals to see our Golden State through to 2030. These goals are the product of many years of intensive debate among many Stakeholders, exhaustive analyses, and copious inputs. We simply cannot afford to keep starting over again.

Very truly yours,

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EXHIBIT 1:

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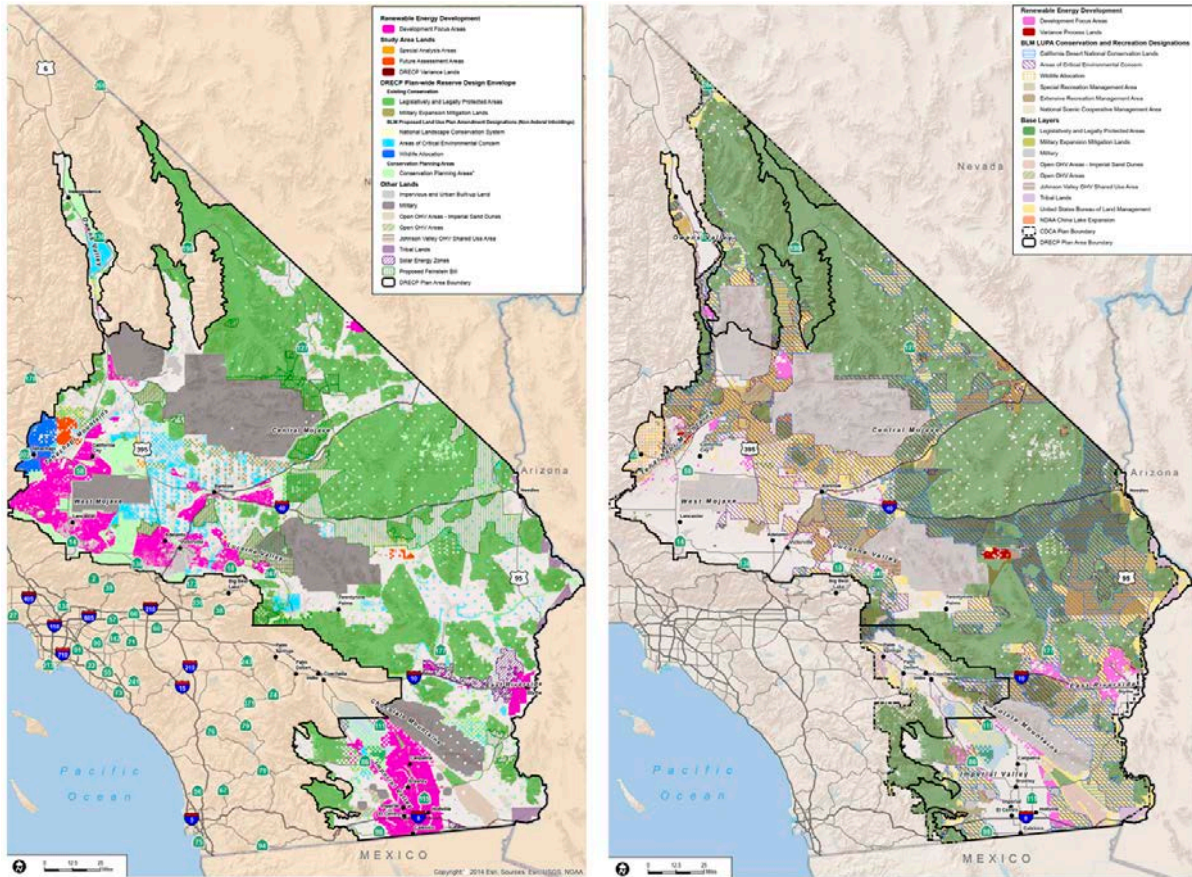
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EXHIBIT 2:

San Diego Mineral & Gem Society, Inc. comment letter

Maps – figs. 1a, b and 2 (annotated)

**Exhibit 2: Draft DRECP – Note Solar Energy Zones and Development Focus Areas (DFAs)
DRECP Record of Decision – Note recreation and conservation designations**



Maps “Before” and “After” DRECP Record of Decision (ROD)

Fig. 1a (left): DRECP Preferred Alternative Plan, 2014. Solar Energy Zones (angled-right line pattern) and Development Focus Areas (DFAs)(magenta-colored areas) targeted for utility-scale renewable energy projects, some of which encroach areas of concern to conservation and recreation groups, including Rockhounds.

Fig. 1b (right): The DRECP Record of Decision was published on September 14, 2016. Solar Energy Zones and DFAs in the Preferred Alternative Plan (left) were modified significantly (right) to accommodate conservation and recreational concerns, including hobby collecting, based on numerous comment letters. Note areas with Recreation designations (vertical and cross-hatch line patterns).

Amending the DRECP could take away accommodations made for recreational users (e.g., Rockhounds) in the 2016 ROD and restore/enlarge areas potentially available for utility-scale renewable energy projects.

See following pages for enlarged views of Figs. 1a, b.

On a conference call with Stakeholders held on September 13, 2016, **BLM’s Vicki Campbell** reported that **DRECP** received numerous detailed comment letters from Rockhounds. The letters cited concerns about: 1.) **Development Focus Areas (DFAs)** in the **Draft DRECP** which appeared to conflict with hobby collecting areas or access to them, and 2.) a paucity of designated areas for recreational uses (**Fig. 1a**).

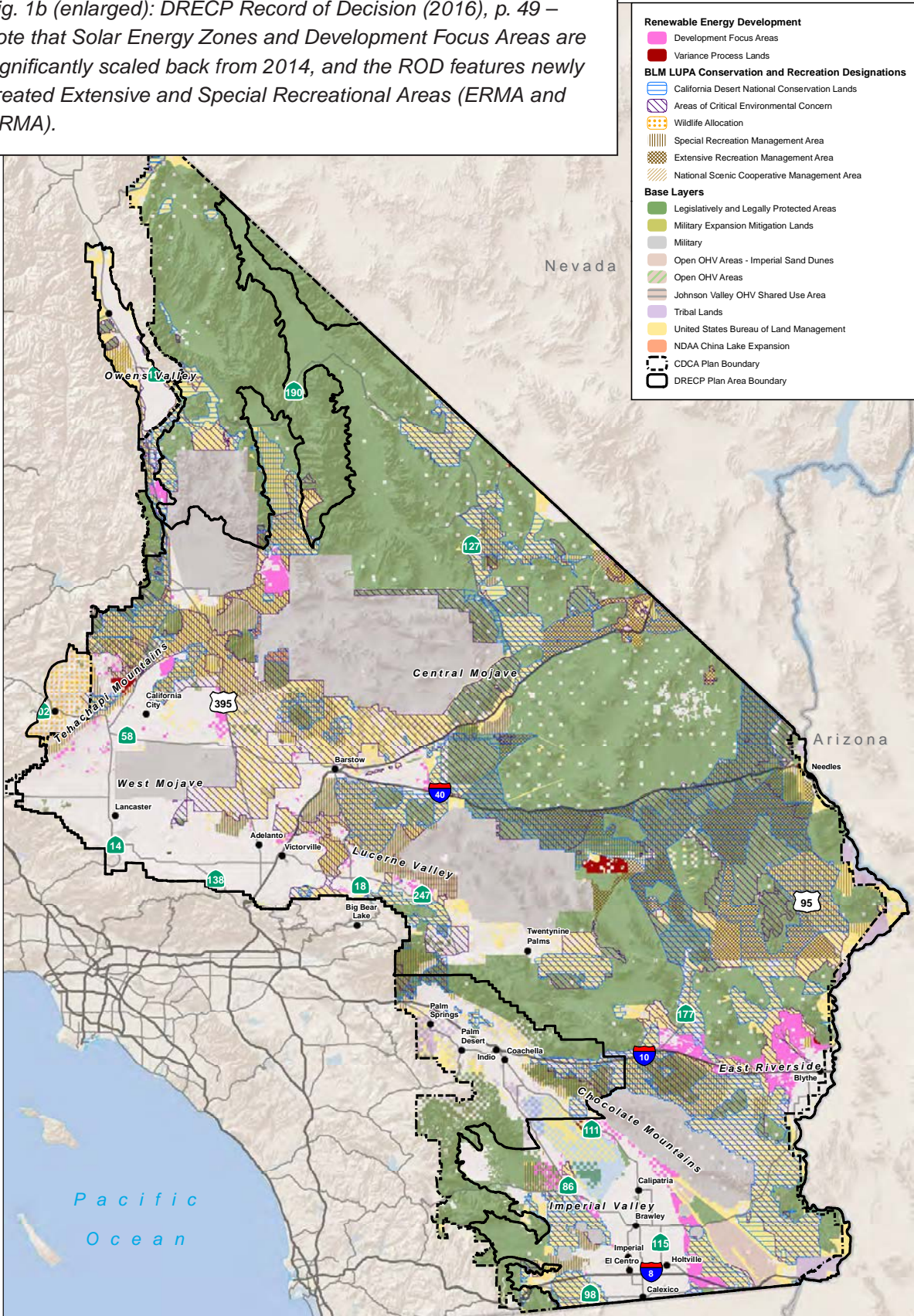
During the call, **Ms. Campbell** drew attention to revisions made in the **DRECP ROD** which specifically

accommodated Rockhound concerns (**Fig. 1b**).

The 2018 DRECP Review causes concern for Rockhounds that the pre-**ROD DFAs** might be restored, perhaps even enlarged for potential industrial development or transmission corridors, and recreational areas (SRMAs and ERMAs) could be reduced or eliminated.

Rockhounds ask **BLM** to make no changes to the **DRECP ROD** which reflect considerations for recreational users, including hobby collectors.

Fig. 1b (enlarged): DRECP Record of Decision (2016), p. 49 – note that Solar Energy Zones and Development Focus Areas are significantly scaled back from 2014, and the ROD features newly created Extensive and Special Recreational Areas (ERMA and SRMA).



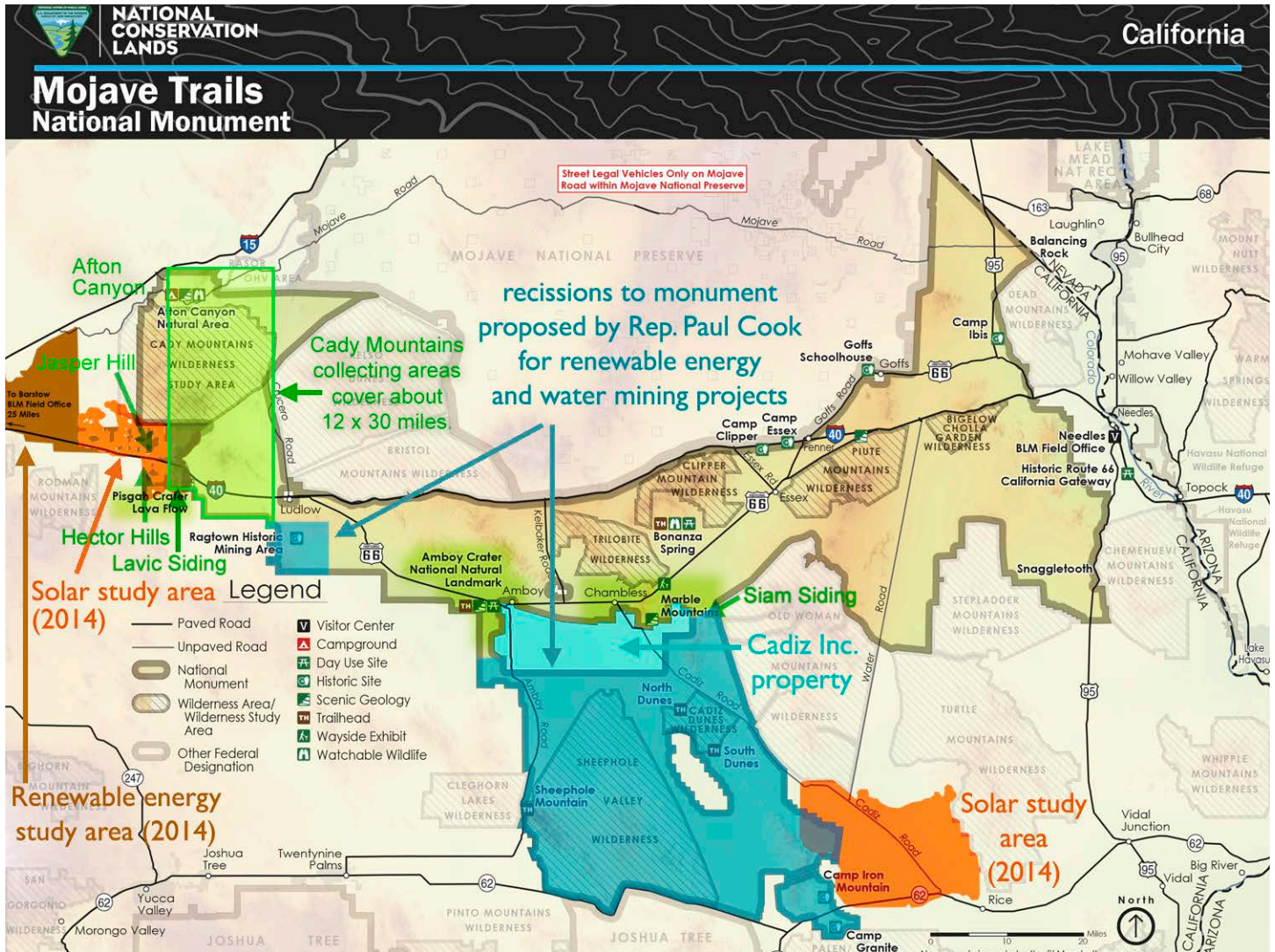


Fig. 2: Map of the Mojave Trails National Monument with its significant features, including areas of historical, cultural, geological, paleontological significance, and more than 15 areas therein or adjacent which have protective designations (i.e., wilderness, Mojave National Preserve, Joshua Tree National Park, Historic Route 66) (Source: BLM, with annotations by SDMG).

Annotations: Renewable energy (brown) and solar study (orange) areas considered prior to the monument designation (2/12/2016) and the DRECP ROD (9/14/2016); ca. 500,000 acres (dark aqua) proposed by Rep. Paul Cook for recission from the monument for renewable energy and water pumping projects; hobby collecting areas (lime green).

Note that the Cady Mountains collecting area covers 12 x 30 miles, partially overlapping an ACEC in the DRECP ROD (see fig. 1b). Currently, BLM allows Rockhounds to continue collecting in this area as previously. Rockhounds would like the accommodation to be made permanent.

Jerome E. Perez
BLM-California State Director
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EXHIBIT 3:

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