

Comment – DAC meeting, March 20, 2018, Victorville, CA

- I. Reinstatement of DAC meetings and getting the public caught up on what it's been doing over the past 13 months since the last DAC meeting.**
- II. DRECP Review FR Doc. 2018-02098**

Lisbet Thoresen

Public lands representative for San Diego Mineral & Gem Society, Inc.

27636 Ynez Road L-7230

Temecula, CA 92591

lisbet@lthoresen.com

951-676-6434

Subject: Reinstatement of DAC meetings and getting the public caught up on what it's been doing over the past 13 months since the last DAC meeting.

My name is **Lisbet Thoresen**. I am Public Lands Representative for the **San Diego Mineral & Gem Society, Inc. (SDMG)** and Chair of the Public Lands Advisory Committee – South for the **California Federation of Mineralogical Societies, Inc. (CFMS)**. I would like to say how glad I am for this DAC meeting, which convenes for the first time in more than one year. The DAC meetings are the most important forum we, the public, have to engage with the BLM via the council, to learn what's going on, what's being planned, and for us to provide input. The Rockhound community has missed you. So, thank you, and welcome back.

The suspension of the council's activities have had the effect of being an opaque barrier, a cone of silence surrounding BLM and its activities, leaving the public in the dark even as planning and decisions are being made behind the scenes on some of the most consequential proposals, processes, and implementations related to public lands management. So, I have three questions/requests. First: when is the next DAC meeting planned? Second: would the BLM please post on its website briefs, or progress reports if you will, providing some details on the backlog of the past year's activities and status of its various projects? Something with more substance than the newsy press releases or Newsbytes. Third: if BLM does post these reports/briefs, could it please send out a broadcast email containing hyperlinks to their URL destination web pages?

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Subject: DRECP Review FR Doc. 2018-02098

Lisbet Thoresen. San Diego Mineral & Gem Society, Inc. (SDMG). First, thank you to Russell Scofield for his presentation. I've placed a copy of the draft version of a comment letter on the DRECP review before each DAC member, with copies also provided to some BLM staff, including Steve Razo and Russell Scofield. The letter was prepared by SDMG and co-signed by seven other California societies and more than a dozen individual rockhound advocates. This is a draft version of our letter – more signatures will be added by the time it's ready to submit to BLM State Director Jerome Perez on March 22nd, but it is provided to you today for your reference.

The way our letter is written reflects some of the same concerns and perhaps, confusion that other organizations and individuals seem to have about what the BLM needs to hear from the public. That said, we took the kitchen sink approach in drafting our letter. We incorporated by reference our 48-page letter from February 2015 to ensure BLM understands that many concerns we articulated in 2015 are still relevant, with some adjustment. We recapitulated our understanding of the accommodations Rockhounds obtained in the Record of Decision (ROD) published in September 2016, now with concern for wanting reassurance that those accommodations will be preserved. We also anticipate the possibility of the Review going forward and express concerns we would then have in a process of amending the DRECP. But we want to make clear, we feel strongly that the DRECP should be left alone.

So, I have a few remarks about why and a few questions for the DAC.

First, it seems to me there is only one objective to amending the DRECP: to provide more opportunities to renewable energy development and large-scale commercial mining. It's in the second sentence of the Federal Register notice: "Promoting Energy Independence and Economic Growth." Yes, further down under the supplemental information section, a Review will also consider "...increasing opportunities for increased...recreational and off-highway vehicle (OHV) access, ... and grazing." Forgive me if I think the administration is being gratuitous. It seems improbable that some groups whose experience has been to be overlooked or marginalized, notably some recreational users, but grazing most definitely, not to mention rural communities and the tourist economies of gateway communities, which are not even mentioned in the Federal Register notice, are now high priority criteria for the administration to justify a full-scale amending process. I would like to hear from the DAC how these other Stakeholders feel.

DRECP has only begun to be implemented. There are no data to provide either quantitative or qualitative references to justify amending the plan at this time, much less to help identify what plan-

level changes would make sense. But clearly, BLM cannot give every Stakeholder more accommodations than they have now without it coming from someone else. There is no such thing as surgical targeting when there are 50 Stakeholders involved, many of whom have conflicting values and all of whom are competing for the same land.

Regarding Rockhounds, to the best of my understanding, opening DRECP to review will not give them more accommodations than they can seek now (without a review). We would like clarification on that from the BLM.

We are very concerned that opening the DRECP to Review and amending it could make them vulnerable to losing accommodations and to eroding the quality of experiences they currently enjoy when they venture into the desert. It should be obvious that providing more renewable energy opportunities in or around recreation areas would mean more intrusion of utility-scale projects into unspoiled wildlands and viewscapes that all desert lovers cherish.

Conversely, the DRECP – in its present form – is the best practical, achievable standard for preserving quality of life and cultural values, whether you're a resident or a visitor to the desert. The plan preserves the local economies of gateway communities which are powered by a well-managed landscape to support tourism. Opening the DRECP to review seems sure to completely unravel eight years of hard won compromises and throwing out a functioning guideline that has not even been tested yet.