California Energy Commission
DOCKETED
09-RENEW EO-1
TN 74784
FEB 23 2015

California Energy Commission
Dockets Office, MS-4
Docket No. 09-RENEW EO-01
1516 Ninth Street
Sacramento, CA 95814-5512

February 21, 2015

Subject: DRECP NEPA/CEQA [Docket: 09- RENEW EO-01]

To Whom It May Concern:

Please consider the comments below concerning the Desert Renewable Energy Conservation Plan (DRECP). In general, I support the Preferred Alternative Plan of the DRECP, but I am concerned that the none of the five alternative plans in the current Draft DRECP contains explicit provisions protecting some recreational uses of public lands in the California desert, specifically amateur rock collecting, or rockhounding. Some areas that have been popular with rockhounds for many decades may be closed to rock collecting due to proposed changes in land use designations, while other areas may be subject to restricted access due to closure of trails and roads through adjacent lands designated as Development Focus Areas (DFAs).

In additional to the recreational enjoyment derived from rock collecting, the unique geology of the California desert provides to the public, from school-age children to retired seniors, the opportunity to learn about the living natural history of the earth. I strongly support conservation designations that would protect the natural character of California's desert landscapes and offer enduring protection of desert wildlife, habitat, and previously untouched wild areas that rockhounds appreciate. Such designations include new areas of critical environmental concern (ACEC), National Landscape Conservation System (NLCS), and Special Recreation Management Areas (SRMA).

I recommend that ACEC and NLCS management objectives should specifically state that rockhounding is an acceptable/compatible activity for such designations to ensure access and use in the future. In addition, Special Recreation Permits for rockhounding should be identified as a compatible use in the management objectives for the NLCS lands.

The BLM should ensure that open routes are maintained through Development Focus Areas (DFAs) and that development activity does not block access to surrounding recreation lands or rock collecting areas.

Many areas within the boundaries of the DRECP lack special protective designations, such as ACEC or SRMA. Such omissions expose special areas in the desert to potential future development. Also, it may make access to them so difficult that these areas will be effectively off-limits due to lack of vehicular access through adjacent lands (i.e., DFAs). Access to collecting areas should be preserved and maintained for motorized vehicles (i.e., 4x4-type vehicles) as part of the Special Recreation Management Area designation. The same consideration or easement should be specified in Development Focus Areas (DFAs). It is not reasonable for rockhounds to be able to access collecting areas by pack animal or hiking in/out long distances on foot.

Independent critical review and assessment of the impact that industrial activities in Development Focus Areas (DFAs) may have on adjacent public lands based on their unique characteristics have not been performed. Moreover, a transparent process is lacking for presenting assessments for public review should such reviews/assessments be performed. Although the BLM's mission statement holds it accountable to the public, the DRECP empowers the BLM, at its own discretion and at any future time, to arbitrarily change or override features of protective designations such as SRMA or ACEC, especially if they conflict with competing values, e.g., economic interests. Further, the BLM administrator may exercise discretion -- without public accountability -- to arbitrate conflicting values embodied in different land use designations where overlaps occur. For example, the clause 'more restrictive shall apply' in NLCA CMAs negates the protections afforded routes of recreational travel in the SRMAs. This phrase and other conflicting phrases that undermine SRMA and ACEC designations should be expunged from the Plan. For similar reasons, 'recreation' should be added to the list of values considered in future travel management planning. Previous agency assurances to recreational users that designated motorized routes will not be closed by the DRECP now or in the future will be undermined, if the term 'recreation' is not added to the explicit language of the Final EIR/EIS.

The intrusion of utility-scale energy projects throughout all the landscapes and viewsheds within the DRECP boundaries can be seen in the DRECP's checkerboard maps of DFAs juxtaposed adjacent to public lands. The necessity for building transmission corridors on public lands to connect DFAs to the power grid dissolves whatever physical barriers purport to separate industrial activities on DFAs from our last wild lands, fragile habitat and unique geological features. If these fragile ecosystems and landscapes are compromised in deference to competing values that favor development, the cultural history and natural history values of the California desert will be obliterated irretrievably. At the very least, the Desert Renewable Energy Conservation Plan (DRECP) should be revised to remove or at least reduce the amount of Development Focus Areas (DFAs), because of the adverse impact on DFA-adjacent areas and also because the DRECP overestimates the amount of land necessary to meet renewable energy goals, while underestimating the potential to meet these goals with distributed generation such as rooftop solar.

I supports plans to increase lands managed with an emphasis on recreational uses and exclude them from renewable energy development in the future through their designation as Special and Extended Recreational Management Areas. These proposed designations in the Preferred Alternative Plan should be carried over to the Final EIR/EIS.

Please see below comments about specific collecting areas where access through adjacent DFAs are not specified or SRMA designations are lacking. I would like the DRECP to be revised to reflect my specific concerns. Also, I would like the public to have sufficient time and

opportunity to review further revisions to the DRECP based on these and other comments from the rockhound community.

Afton Canyon

The Afton Canyon collecting area is located at the I-15, at the Afton Turnoff about 32 miles east of Barstow and 25 miles west of Baker. This area has long been a rockhound area that has many types of agate, sagenite, jasper and opalite. This area should be designated Special Recreation Management Area (SRMA). Also, roads and trails providing access to these areas, including roads and trails passing through adjacent lands, including DFAs, should be maintained for vehicular access.

Blythe

The Blythe collecting area is located at T4S, R20E (Blythe DAG), north of the Palen McCoy Wilderness and south of the Little Maria Mountains. A DFA appears to cover at least a portion of this area where psilomelane is collected. The BLM should redefine the DFA's boundaries so that it excludes this area, with at least a 1,000-foot radius around it. Any designated routes that allow access to this collecting area should be included.

Boron

The Boron collecting area is located between Saddleback Mountain and California City Boulevard, north of Highway 58 and south of Twenty Mule Team Parkway (Cuddeback Lake DAG). This collecting area contains petrified wood, chapenite, jasper and agate, is located within a DFA. We ask that the BLM redefine the DFA so that it excludes the Boron collecting area, with at least a 1,000-foot radius buffer around it. Any designated routes that allow access to this collecting area should be included.

Brown Butte (aka Lonely Butte)

The Brown Butte collecting area is located at T10N, R11W, Sections 2, 3, 10 & 11 (Lancaster DAG). This collecting area, which is good for petrified reeds, agate, jasper, and jasp-agate, is within a DFA. I ask the BLM to redefine the DFA so that it does not cover this area, with at least a 1,000-foot radius buffer around it. Any designated routes that allow access to this collecting area should be included.

Cadiz

The "Future Assessment Area" designations in the Cadiz Valley should be removed, and the areas should be designated NLCS to protect the natural setting of the desert for enjoyment of unconfined recreation, and to be consistent with the objective of managing the Route 66 corridor to protect the relatively undisturbed viewshed.

Chambless

The Chambless fossil collecting site is adjacent to the Trilobite Wilderness/Marble Mountain area. Its location is off the National Trails Highway, about 2 miles west of Amboy. The current roads to the collecting sites are outside the Wilderness Area and are used as a staging area to walk into the collecting sites. The roads in this area should be left open to provide unimpeded access to the fossil sites.

Cinco
The Cinco collecting area is located at T31S, R11W, south/southwest of Jawbone Station (Tehachapi DAG). A DFA appears to cover some or all of this area, where quartz and feldspar crystals are collected. The BLM should redefine the DFA, so that this area is excluded from it, with at least a 1,000-foot radius buffer around it. Any designated routes that allow access to this collecting area should be included.

Gem Hill
The Gem Hill collecting area is located at T10N, R13W, Sections 26, 27, 34, and 35 (Lancaster DAG). This collecting area for agate, jasper, rhyolite, common opal, and petrified wood, is within a DFA. The BLM should refine the DFA, so that it excludes this area, while providing at least a 1,000 foot radius around it. Any designated routes that allow access to this collecting area should be included.

Hector Hills and Pisgah Crater
A DFA is located near the Hector Hills collecting area, located at T8N, R5E, Sections 4, 5, 6, 15, 16, 21 and 22 (Newberry Springs DAG). If this DFA blocks or constrains access to Pisgah Crater Road, its boundaries need to be redefined. The Pisgah and Hector Hills area should be protected with NLCS designation (with exception for rockhounding activitiy) because of its importance to a variety of desert wildlife and unique geological features, including the Pisgah lava flow.

Hauser Beds
The Hauser Beds collecting area is located at T 8 ½ S, R 19 E, Sections 1, 2, 4, 6, 8, 10, 11, 12, 14, 18, 20, 21, 22, 24, 26, and 28; T 8 ½ S, R 19 E, Section 16; T 8 ½ S, R 20 E, Sections 6, 7, and 18 (Trigo DAG). Not only is this area one of the best collecting areas in our deserts, it is covered by a Memorandum of Understanding between the U.S. Bureau of Land Management and the California Federation of Mineralogical Societies, Inc. The MOU was signed on February 22, 2000, and has never been terminated by either party. The MOU recognizes the importance of the Hauser Geode Beds area as a major recreation area for dispersed rockhounding recreation. It appears that the Mule Mountain LTVA SRMA partially covers this collecting area. The BLM should expand this SRMA to include the entire Hauser Beds area as described above.

Kramer Junction
I understand that certain groups are lobbying to have certain DFAs "relocated" to the Kramer Junction area (Victorville DAG). I am opposed to any DFA being placed on the southeast corner of Kramer Junction (south of Highway 58 and east of Highway 395), as this is a collecting area for dendritic agate, common opal, and obsidian.

Lavic and Jasper Hill
The Lavic and Jasper Hill collecting areas located at T8N, R5E, Sections 13, 14, 15, 22, 23, 24, 25, 26, 27, 34, 35, 36 and T8N, R6E, Sections 18, 19, 20, 30, 29, 31, 32, and T9N, R4E, Sections 29, 30, 31, and 32 (Newberry Springs DAG). These jasper collecting areas are located within the Route 66 viewshed, between Ludlow and Newberry Springs. I appreciate that the BLM is proposing the National Trails Viewshed SRMA, which protects various recreational activities along Route 66. I also appreciate that the BLM has specifically recognized the importance of collecting in the Trilobite and Ship Mountains, and created a Recreation Management Zone to protect collecting in those areas. However, this SRMA encompasses some very special collecting places along Route 66. I ask the BLM to increase the size of the National Trails

Viewshed SRMA, so that it includes the Lavic and Jasper Hill collecting areas and specifically allows collecting in these areas.

Newbury

The Newbury collecting area is located at T8N, R3E (Newbury Springs DAG). It is north of Newberry Mountains Wilderness and south of Route 66. A DFA appears to cover and/or surround this collecting area for nodules and agate. I ask the BLM to redraw the DFA boundary so that it does not cover this area, providing at least a 1,000-foot radius around it. Any designated routes that allow access to this collecting area should be included.

Rainbow Rock

DFA designations should be removed from lands in the Rainbow Rock area west of State Route 86 in Imperial County. DFA status would be inconsistent with protecting the natural setting of the area, which is important to visitors seeking dispersed and unconfined recreational opportunities in the Ocotillo Wells and Anza-Borrego area.

Sperry Wash

The Sperry Wash collecting area is located in the Dublin Hills, west of Shoshone (Owlshead DAG). Given this area's close proximity to the Amargosa River Valley/Grimshaw SRMA, and also because rock collecting is a legitimate use within this SRMA, I ask that the BLM expand this SRMA to include the Sperry Wash collecting area in order to protect this important recreational activity.

Stoddard Wells

The Stoddard Wells collecting area is located at T11N to the 15 Freeway, R1W to R3W, up to the southern boundary of Stoddard OHV Area (Victorville DAG). The area includes Black Mountain and Sidewinder Mountain. The BLM should ensure that no development blocks open route access to the Stoddard Wells rockhounding area in the vicinity of Sidewinder Ridge, west of the Lucerne Valley Cutoff Road. I also ask the BLM to designate this area as a new Special Recreation Management Area (SRMA).

Yermo

The Yermo collecting area is located at T10N to T11N, R1E to R2E (Newberry Springs DAG), in the Calico Mountains between the two Superior Cronese ACECs. This area is important to rockhounds. The greater collecting area overlaps approximately six sections of the western edge of the eastern Superior Cronese ACEC. A DFA appears to cover some of this excellent collecting area, where agate, petrified palm root, jasper and chert are collected. I ask that the BLM designates this area as a new SRMA to protect collecting activities in it. If the BLM is unwilling to create a new SRMA designation for the Yermo collecting area, then please expand the Superior/Rainbow SRMA to include it, with specific provision for rock collecting as an allowable use in this area. At the least, the BLM should redefine the DFA encroaching this area, so that it excludes this collecting area from the DFA. Any designated routes that allow access to it should be included.

Yuha Basin

The south side of I-8 between Highway 98 and Dunaway Road has giant fossilized oyster shells that have been collected by rockhounds since the 1950s. Currently, this area has overlapping ACEC and NLCS designations. I ask that BLM allows rockhounding to continue as a permissible activity and all roads into the area be left open.

Sincerely,

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