

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



February 20, 2015

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

California Energy Commission:

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 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 & mineral 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 addition 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 ability to collect mineral samples on public lands is also a very important educational tool. Being able to participate in such activity in my youth is part of what personally encouraged me to pursue an advanced degree within the Earth Sciences.

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.

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.

The following areas have long been collecting sites for rockhounds and should be maintained open for vehicular access:

Afton Canyon; Blythe; Boron; Brown Butte (aka Lonely Butte); Cadiz; Chambless; Cinco; Gem Hill; Hector Hills and Pisgah Crater; Hauser Beds; Kramer Junction; Lavic and Jasper Hill; Newbury; Rainbow Rock; Sperry Wash; Stoddard Wells; Yermo; and Yuha Basin.

Sincerely, 

Erika Bowen
Ebowen.ca@gmail.com

