

**Energy - Docket Optical System**

**From:** Dinah Shumway <terramins@gmail.com>  
**Sent:** Sunday, February 22, 2015 11:38 AM  
**To:** Energy - Docket Optical System  
**Subject:** DRECP Comment: Mining Claims and ACEC's

⤴ Under FLMPA how will the implementation of the DRECP affect existing mining claimants' rights?

The designated areas will close those areas to mineral entry. It is critical to our society that mineral studies be continuously conducted in the light of evolving scientific knowledge and understanding of past environments, evolving tectonic events and the continuing evolution of technology and its need for mineral, some rare, resources. I am not confident that sufficient scientific studies have been conducted that will support the exclusion of mineral entry on the total of those lands.

The imposition of ACEC's over areas in which existing mining claims seems to be in conflict with the mining claimants' rights to explore for minerals on public lands. It seems illogical that any studies conducted to support the establishment of an ACEC could possibly be thorough enough to establish sufficient data that would legitimately underlie criteria to establish **150 new ACEC's**. Each ACEC is assumed to be unique, or why would such a designation be proposed?

⤴ What would be time line to conduct such studies which would support ACECs ? Where would public comment on the designation of the new ACEC's would be allowed. Here in the DRECP process? Ninety days is nowhere near enough time to comment on ACEC's that, in fact have not even been subjected to the time required for proper scientific scrutiny.

It sounds from the reading of the DRECP document that the lands so designated for the ACEC's would be withdrawn from multiple use during the "scientific" studies of the ACEC's. Each ACEC is assumed to be unique. Under the short time line for implementation of the DRECP, how would it be possible to conduct the necessary **scientific** studies to support such "**unique designations**" without incurring accusations of "shoddy science" practices?

Lands targeted as ACEC's should be open to the establishment of mineral claims until and unless the ACEC has sufficient scientific conclusions to support the establishment of an ACEC. It is illogical to think that there is enough viable scientific data to support the establishment of the huge numbers (150) of ACEC's at this time, considering the time used for the studies to establish ACEC's in the recent past. **This hurried and identical programmatic approach to the designated ACEC's seems to NEGATE the claim that each ACEC is in fact, unique, and looks instead as an attempt to exclude or at least discourage any future mineral entry.**

It is critical to our society that mineral studies be continuously conducted in the light of evolving scientific knowledge and understanding of past environments, evolving tectonic events and the continuing evolution of technology and its need for mineral, some rare, resources.

✧ What happens to mining claims in designated areas when goals have been attained?

The text seems to indicate that designated areas will be withdrawn from mineral entry. But what if the 33% goal is reached in 5 yrs, or 10 years - or as has been indicated by the testimony of knowledgeable professionals – has already been attained? Will the designated lands then be released to multiple use? If not why not. ? If the goals for renewable energy are attained all lands designated should be UN-designated and released back to multiple use.

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Dinah Shumway  
Principal Geologist  
TerraMins Inc.  
12277 Apple Valley Road, #184  
Apple Valley, CA 92308  
[www.terramins.com](http://www.terramins.com)