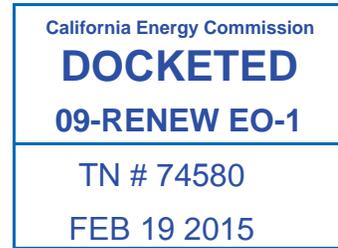


EMAIL: docket@energy.ca.gov

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



Re: DRECP NEPA/CEQA

To Whom It May Concern:

ALAA supports the Preferred Alternate of DRECP with the changes listed below:

I am commenting on DRECP as the president of American Lands Access Assn. A 501-C-4 educational, non-profit organization of over 10,000 organized rockhounds. Before I comment, I'd like you to know who and what we are. Unlike the environmental community who has deep pockets and a huge paid staff of people working on how to spin their comments, rockhounds are not too organized and have only volunteers who are not savvy as to how to get your attention.

Our organization is national but most of it's members come from the western states where public lands are located. Rockhounds have been collecting in the desert of Southern California since the 1950s, but there has been no study done on how many rockhounds are in the desert at any one time, unlike the off road community who had 'events' that can be evaluated. Rockhounds come from all walks of life. From academia to manual laborers and all points between. We collect rocks, minerals and invertebrate fossils. Rockhounds have found many of the items now housed in museums and university labs, but with no recognition as to who found them. The rocks that grace beautiful jewelry are found as dirt encrusted rocks till a rockhound takes them home and cuts them open and polishes them. Rockhounds share their finds with school children as well as senior centers and takes many of both to the deserts to see for themselves when we can. We ask that motorized vehicles be allowed because many of our rockhounds, including myself, are not able to walk any distance in the desert but should not be locked out of this awesome place we all revere. On all of the sites below we ask that rockhounding areas and their motorized area become a part of the Special Recreation Management Area and protected from having it listed in the Development Focus areas and taken out of National Conservation Lands and ACECs. We have already given up, for the good of other special interests, many rockhounding areas in the desert beginning with the Desert Protection Act of the 1970s. We believed at that time, the Desert Protection Act would be the final decision of how the desert would be managed, but it was again evaluated in the 1980s-1990s and the areas rockhounds could recreate in was decreased again.

Finally, this last time we would like to have the voice of the rockhounds heard as to those few places that are left and ask that they be protected, just as other areas are

protected. If this isn't recognized, rockhounds will become extinct and there will be an impact on those small towns throughout the desert who will lose revenue from those rockhounds.

ALAA appreciates that the Bureau of Land Management, along with the CEC and other agencies, has issued the Desert Renewable Energy Conservation Plan, to attempt to identify areas where energy development in our deserts may be less harmful to plants, wildlife, scenery, recreation and other values. Areas that should not be developed will also be identified.

However, there are many special places in our deserts that the DRECP does not adequately protect from renewable energy development. Specifically, there are several rock collecting sites that are within Development Focus Areas, and some very special collecting places that are not within Special Recreation Management Areas, but that should be.

Afton Canyon

Located off 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 with many types of agate, sagenite, jasper and opalite. We ask that this area, along with the roads and trails be considered for Special Recreation Management Area.

Blythe

The Blythe collecting area is located at T4S, R20E (Blythe DAG). It is north of the Palen McCoy Wilderness and south of the Little Maria Mountains. A Development Focus Area (DFA) appears to cover at least a portion of this psilomelane collecting area. I ask the BLM to redefine or redraw the DFA so that it does not cover this area, with at least a 1,000-foot radius around it that includes any designated routes that allow access to this collecting area.

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, which contains petrified wood, chapenite, jasper and agate, is within a DFA. I ask the BLM to redefine the DFA so that it does not cover the Boron collecting area, with at least a 1,000-foot radius buffer around it that includes any designated routes that allow access to this collecting area.

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 that includes any designated routes that allow access to this collecting area.

Chambless

The Chambless fossil collecting site is adjacent to the Trilobite Wilderness/Marble Mountain area. It is off the National Trails Highway, about 2 miles west of Amboy. The current roads to the collecting sites are outside the Wilderness and are used as a staging area to walk into the collecting sites. We ask that the roads in this area be left open so we can access 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 collecting area for quartz and feldspar crystals. 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 that includes any designated routes that allow access to this collecting area.

Gem Hill

The Gem Hill collecting area is located at T10N, R13W, Sections 26, 27, 34, and 35 (Lancaster DAG). This collecting area, which is good for agate, jasper, rhyolite, common opal, and petrified wood, is within a DFA. I ask the BLM to refine the DFA so that it does not cover this area, and at least a 1,000 foot radius around it, and any designated routes that allow access to this collecting area.

Hector Hills

There is a very small DFA near this collecting area, located at T8N, R5E, Sections 4, 5, 6, 15, 16, 21 and 22 (Newberry Springs DAG). This DFA is only a problem if it would block or deny access to Pisgah Crater Road. If it would, I ask that it be redefined so that it does not deny access.

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 as though the Mule Mountain LTVA SRMA partially covers this collecting area. I ask the BLM to expand this SRMA to fully include the entire Hauser Beds area, as described above. Currently I, as ALAA president, and past president of the CFMS, who initiated the original MOU, has initiated talks with the El Centro Field Office to update the MOU. And I also ask the BLM to acknowledge the MOU at the District and State Office levels and expressly state in the SRMA that this MOU shall continue.

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 especially appreciate the fact that the BLM has specifically recognized the importance of collecting in the Trilobite and Ship Mountains, and has created a Recreation

Management Zone to protect collecting in those areas. However, this SRMA does encompass 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, with at least a 1,000-foot radius around it, and any designated routes that allow access to this collecting 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 given that rock collecting is a legitimate use within this SRMA, I ask that this SRMA be expanded to include the Sperry Wash collecting area, protecting this important recreational activity.

Stoddard Well

The Stoddard Well 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. A DFA appears to cover or come very close to this marble collecting area. This area is frequented by rockhounds and I ask the BLM to recognize this area as a new Special Recreation Management Area (SRMA) under the DRECP. This should protect the important rock collecting recreational activity that takes place here. If the BLM is unwilling to create a new SRMA, I ask that this DFA be redefined so that it does not cover this area and any designated routes that allow access to this collecting area.

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. The 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 we collect agate, petrified palm root, jasper, and chert. I ask the BLM to recognize this area that is frequented by rockhounds as a new SRMA under the DRECP, and to protect the important rock collecting activities in this area. If the BLM is unwilling to create a new Special Recreation Management Area, I ask that the Superior/Rainbow SRMA be expanded to include this area, and to specify that rock collecting is an allowable use in this area. Alternatively, I ask that this DFA be redefined so that it does not cover this area and any designated routes that allow access to this collecting area.

Yuha Basin

The South side of I-8 between Hiway 98 and Dunaway Road has giant fossilized oyster shells that have been collected by rockhounds since the 1950s. We ask that this area be considered under SRMA. It is currently listed under overlapping ACEC and NLC lands. We ask that rockhounding be continued and all roads into the area be left open.

ALAA would like to add: In establishing the California Desert Conservation Area (CDCA) within the Federal Land Policy and Management Act of 1976 Congress found that:

‘the California desert contains historical, scenic, archeological, environmental, biological, cultural, scientific, educational, recreational, and economic resources that are uniquely located adjacent to an area of large population.’

ALAA would like to request that ‘recreation’ be added to the array of values to be emphasized in the future travel management planning.

If recreation is not added to this language in the Final EIR/EIS, it will go contrary to the agency assurance to recreation stakeholders that designated motorized routes would not be closed by DRECP.

Because of the ‘more restrictive shall apply’ clause regarding NLCA CMA’s, the protections for recreational routes of travel in this SRMA’s mean nothing.

ALAA supports plans to increase lands managed for recreational emphasis and exclude them from renewable energy development through designation of Special and Extended Recreational Management Areas. We ask that these proposed designations from the Preferred Alternative be carried over to the Final EIR/EIS.

We do not support any additional land for Areas of Critical Environmental Concern (ACEC) or National Conservation Land (NCL) designations. The Bureau of Land Management must carefully consider whether land qualifies for the above designations because of significant criteria of relevance or importance. We believe the hard work exhibited in the Draft DRECP document show that in-depth investigation has been undertaken to find those special areas that warrant increased protection. In our careful examination we do not find any other or additional areas that warrant inclusion to ACEC or NCL designations.

Thank you for your time and interest in the future of rockhounds in the desert.

Shirley Leeson, President
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