

## Energy - Docket Optical System

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**From:** Kandie Foust <nomoredirtywater@gmail.com>  
**Sent:** Sunday, February 22, 2015 9:43 AM  
**To:** Energy - Docket Optical System  
**Subject:** Docket No. 09-RENEW EO-01, DRECP NEPA/CEQA

California Energy Commission

**DOCKETED**

**09-RENEW EO-1**

TN # 75011

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**From:** [dbuch7326@aol.com](mailto:dbuch7326@aol.com) [mailto:[dbuch7326@aol.com](mailto:dbuch7326@aol.com)]  
**Sent:** Saturday, February 21, 2015 9:42 PM  
**To:** [docket@energy.ca.gov](mailto:docket@energy.ca.gov)  
**Subject:** Docket No. 09-RENEW EO-01, DRECP NEPA/CEQA

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:

We support the Preferred Alternate of DRECP with the changes listed below:

My wife and I are commenting on DRECP as concerned tax paying citizens of California and the United States who have spent many days over the last 45 years in our California deserts. As a geologist, I have collected rocks, minerals and invertebrate fossils for our personal use and to use in the classrooms of secondary education and colleges in California that I have taught at over the last 25 years. My wife and I have donated many of these items into local schools, college classrooms, museums and university labs with little or no recognition. The raw rock and mineral materials that become beautiful jewelry are found as dirt encrusted rocks until a geologist, rock hound or gemologist takes them home or to labs and cuts them open and polishes them. My wife and I have both enjoyed learning the art of lapidary arts to make jewelry for our family members through the decades. We have shared our finds with our own children and grandchildren, school children in classrooms in several states, with Cub Scout summer camps programs, Boy Scout and Girl Scout camp programs, as well as in the local San Bernardino County Museum Discovery Rooms. I have taken many students of all ages to the deserts to experience the beauty and grandeur of our deserts on both day trips and 2-7 day camping experiences for the thrill of discovery and collecting the many forms of minerals, rocks and fossils respecting national and state laws.

We ask that motorized vehicles be allowed because many of our students, including myself, are not able to walk the distance in the desert to some collecting areas and should not be locked out of this awesome place we all revere. Wilderness areas are totally discriminatory to our handicapped students who are normally protected by state and national laws, but are being ignored with these DRECP designations. On all of the sites below we ask that rock hounding, family camping and geological study areas and their motorized access routes 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 rock hounding, family camping and educational study sites 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 rock hounds, families and educational institutions could visit in was decreased again as more land was taken by government away from the citizens of this state supposedly for protection of our resources and species.

I and a number of our San Bernardino Valley College faculty and our students in Geology, Geography and GIS disciplines have participated in the West Mojave (WEMO) Travel Study Plan with BLM from February 2012 into 2014 providing educational institutional locations of field study with our college students requesting continued access for college students, but am disappointed in the wholesale disregard for our requests. As a Geology, Geography and Oceanography instructor at San Bernardino Valley College, Victor Valley College, and California State University San Bernardino I have

taken thousands of students on geological field trips to areas from Eastern Sierra Nevada, Death Valley National Park, Mojave Desert National Preserve, Joshua Tree National Park, Thousand Palms Oasis, Coachella Valley and all the desert terrain within this DRECP area. There is nothing worse than driving up a wash to find a newly posted Wilderness sign or a solar site fence when we have the proper current Wilderness and ACEC maps obtained from BLM. We need cooperation from government agencies so that we don't shut out our educational institutions, families and rock hounding communities in this state.

We would like to have the voice of the rock hounds, average California family campers and educators 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, rock hounds, camping families and educational institutions will be significantly impacted with these restricted areas being denied to us. There will also be an economic impact on those small towns throughout the desert who will lose revenue from those rock hounds, families and educational institutional field trips for our students.

We appreciate 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 numerous rock collecting sites and educational study 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:

Afton Canyon is Located off I-15 at the Afton Turnoff about 32 miles east of Barstow and 25 miles west of Baker. This area is an educational institutional field study site for California State University San Bernardino Geology and Geography departments, San Bernardino Valley College, and many others educational institutions from within this state and from other states across this nation. Additionally this area has long been a rock hound area with many types of minerals. We ask that this area, along with the roads and trails be considered for Special Recreation Management Area.

#### Boron:

The Boron area is of interest to Geology departments at nearly every higher level educational institute in California, as well as institutions across the United States. Visits to the Rio Tinto Borax Mine, the Twenty Mule Team Museum, and surrounding collecting areas located between Saddleback Mountain and California City Boulevard, north of Highway 58 and south of Twenty Mule Team Parkway (Cuddeback Lake DAG) are of concern to educational institutions, families camping and rock hounds. This collecting area, which contains many rocks and minerals that are within a DFA. We 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.

#### Chambless:

The Chambless fossil collecting site is adjacent to the Trilobite Wilderness/Marble Mountain area. It is off the National Trails Hwy, 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. The University of California Riverside Geology Department, San Bernardino Valley College, Copper Mountain Community College, and many other institutions throughout California and across the United States schedule field trips into this area, and denial of use would have a major impact on educational research, as well as local rock hounding and family camping.

#### 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 for rock hounds, school groups and families. If it would, we ask that it be redefined so that it does not deny access. San Bernardino Valley College, California State University San Bernardino, Copper Mountain Community College, Victor Valley Community College, and many others across the state and other states conduct field trips to Hector Mine and Pisgah Crater which could be impacted if not held open for educational field studies and rock hounds.

#### 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 rock hounding recreation, family camping and educational institutional field studies. It appears as though the Mule Mountain LTVA SRMA partially covers this collecting area. We ask the BLM to expand this SRMA to fully include the entire Hauser Beds area, as described above. We 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). We are 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 rocks and minerals now found easily anywhere else in the desert. Student groups of many educational institutions find this area useful for introducing the students to field studies, and loss of these areas would impact our educational goals and students learning outcomes demanded by the state of California.

#### 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 rock and mineral collecting areas are located within the Route 66 Viewshed, between Ludlow and Newberry Springs. We appreciate that the BLM is proposing the National Trails Viewshed SRMA, which protects various recreational activities along Route 66. We 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. We 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 with no restriction on family camping.

#### 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 unique rocks and minerals. As this would limit access for rock hounds, family campers, and educational institutional studies, we 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, we ask that this SRMA be expanded to include the Sperry Wash collecting area, protecting this important recreational activity for rock hounds, campers and educational institutions and their students.

#### 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 Mountains. A DFA appears to cover or come very close to this marble collecting area. This area is frequented by rock hounds, family campers and educational study groups. We 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, as well as open up the area to family camping and educational field trips. If the BLM is unwilling to create a new SRMA, we 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 numerous rocks and minerals. We ask the BLM to recognize this area that is frequented by rock hounds and educational institutions 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, we 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, we 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 Hwy 98 and Dunaway Road has giant fossilized oyster shells that have been collected by rock hounds 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 rock hounding be continued and all roads into the area be left open.

We 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:’

We 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.

We support 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 support to our educational institutions, rock hounds and family campers in the California Mojave and Colorado Desert regions.

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I respectfully add my name to this letter, agreeing with all that it contains.

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