THERE IS NO UPSIDE FOR ROCKHOUNDS, IF BLM OPENS DRECP TO REVIEW, BUT THERE IS RISK OF DOWNSIDE.

BLM's goal in amending the DRECP has only one objective: to make available more land for developing industrial-scale renewable energy projects and commercial mining. That will require land designated for other Stakeholders having to be re-designated for Industry. Doing that is almost sure to unravel the fragile compromise it took eight years of tough negotiation to achieve among 50 Stakeholder groups.

DRECP has only begun to be implemented, so there are no data to provide either quantitative or qualitative references to justify amending the plan at this time, much less to help identify what plan-level changes would make sense. While BLM appears to be focusing on conservation designations to achieve its goal, other Stakeholders should not expect to escape unscathed. There is no such thing as surgical targeting when there are 50 Stakeholders involved, many of whom have conflicting values and all of whom are competing for the same land.

Opening DRECP to review will not give Rockhounds more accommodations than they can ask for now (without a review). However, it could make them vulnerable to losing accommodations and to eroding the quality of experiences they currently enjoy when they venture into the desert. It should be obvious that providing more renewable energy opportunities in or around recreation areas would mean more intrusion of utility-scale projects into unspoiled wildlands and viewscapes that all desert lovers cherish. Conversely, the DRECP – in its present form – is the best practical, achievable standard for preserving quality of life and cultural values, whether you're a resident or a visitor to the desert. The plan preserves the local economies of gateway communities which are powered by a well-managed landscape to support tourism.

Let's not risk shattering the compromises that got Rockhounds what they asked for in DRECP by re-opening it to review at this time.

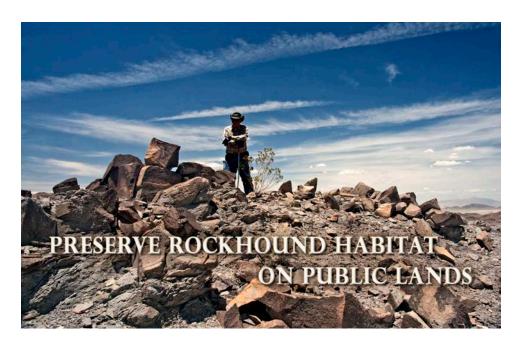
HELP US HELP ROCKHOUNDS, Tell BLM the DRECP should be left alone

Join us and sign onto
San Diego Mineral & Gem Society's (SDMG)
comment letter »
(short url: https://goo.gl/kNbkiM)

Got questions? contact Lisbet Thoresen at editor@sdmg.org



A solitary Joshua tree (Yucca brevifolia) in California's industrialized desert. Photo: Getty Images.



ROCKHOUND FACTS ABOUT THE DRECP RECORD OF DECISION (ROD)

Rockhounds obtained significant accommodations based on numerous comment letters submitted in 2015 on the Draft Desert Renewable Energy Conservation Plan (DRECP). Development Focus Areas (DFA) and other potential encroachments by possible Industrial projects were removed or redrawn in the 2016 Record of Decision (ROD) where adjacencies or overlaps created potential conflicts. For visual references, see: Exhibit 2 in SDMG's comment letter at: https://goo.gl/kNbkiM (short URL).

Recreational designations (**SRMA** and **ERMA**) were created which exclude renewable energy development from the BLM lands on which we collect.

Here are some specifics on what Rockhounds got in the DRECP ROD* -

- BLM eliminated at least two proposed DFAs that would have conflicted with rockhounding activities (Lonely Butte and Brown Hill), and has also clarified that rockhounding is an allowable activity in Special Recreation Management Areas (SRMA).
- Proposed DFAs around Brown Butte and Gem Hill were eliminated to allow continued access to these sites.
- The SRMA in the Amargosa/Grimshaw area was expanded to include Sperry Wash, which is popular for rockhounding. The designated route remains open to allow for responsible access for rock collecting and other recreation activities.
- The DRECP did not close designated routes in the Mojave Trails (Route 66) area, so access remains open to popular rock hounding sites such as Chambless.
- Designation of the Savahia Peak Rock Collection Area along Highway 95 in the Chemehuevi Valley. The management prescription for this area recognizes that "[t]his area is heavily dependent on the use of motorizedvehicles to access the area due to its remoteness, while the recreation action is hiking areas seeking out that one perfect specimen to add to one's own collection." The open designated routes will conform to the Northern and Eastern Colorado Desert Coordinated Management Plan 2002.
- Some SRMAs overlap National Landscape Conservation System (NCLS) lands to provide emphasis on recreational values in management plans.
 However, where SRMAs do not overlap with NLCS lands, the DRECP still allows for continued use of designated routes for recreational activities that do not conflict with the values of the NLCS lands. (See page II.3-225 of the Final DRECP).

Here are some things the DRECP Record of Decision <u>DID NOT DO</u> and for which amending it *IS NOT* required to make changes –

- To date, BLM has not restricted hobby collecting anywhere in the DRECP conservation or recreation areas.
- To date, previously existing routes of access to collecting areas have not been closed. (Drafting the details of management plans will determine what's permissible where – this is where Rockhounds should direct their focus: provide input during the management plan drafting process.)
- A Review is not required for BLM to accommodate specific recreational uses in conservation-designated areas, for example, Rockhounding is allowed in the Area of Critical Concern (ACEC) in the Cady Mountains, now within the Mojave Trails National Monument.
- To date, not a single open ORV route has been closed under DRECP; however, that could change. The first route designation proposal under the DRECP was published on March 16, 2018, and a public comment period is now open through June 14, 2018.
- DRECP does not have to be rewritten for BLM to be able to revise its travel management plans.
- To date, no mining claims for locatable minerals of interest to Rockhounds have been rescinded or rejected.
- To date, none of the areas with recreational designations within DRECP's boundaries have been withdrawn from mineral entry.
- The proposed mineral withdrawal of ca. 1.3 million acres within DRECP's boundaries (FR Doc 2016-31231, 12/28/16) was prompted under the previous administration by some conservation groups concerned with large-scale mining on CDNCL-designated lands. The withdrawal was cancelled on 2/9/2018. It is now moot for the DRECP Review.
- To date, not a single lawsuit against DRECP has been filed.

The DRECP is here to stay. It will be the prevailing guideline for land use management planning, whether or not BLM's proposed Review goes forward. Either way, BLM is committed to renewable energy development in California's deserts, so Stakeholders concerned with preserving natural features and cultural resources in their deserts can look forward to having to defend them against industrialization well into the foreseeable future.

^{*} Input provided by Shaun Gonzales.