May 20, 2016

Dear Director Perez:

This letter is written on behalf of San Diego Mineral & Gem Society’s 800 dues-paying members and nearly 1500 newsletter subscribers. It is our understanding that the creation of a Mojave Trails National Monument sub-group will be considered at the Desert District Advisory Council meeting on May 21st in Barstow. We support the creation of a sub-group, and we look forward to providing input to it.

At this time, we respectfully request inclusion of explicit language accommodating rockhounding and rock and invertebrate fossil collecting (collectively “rock collecting”) in the Mojave Trails National Monument Management Plan. We feel this is necessary because the absence of such language stirred immense confusion and consternation within the community of rockhounds and 110 mineral club affiliates of the California Federation of Mineralogical Societies (CFMS) after the Proclamation was announced on February 12th of this year.

We are grateful for your response and prompt action on May 13th, which clarified BLM’s position recognizing rockhounding as a legitimate recreational pursuit in the Mojave Trails National Monument. We are also encouraged to have Senator Dianne Feinstein’s support. In a letter to Secretary Sally Jewell dated May 12, 2016 (see enclosed letter), Senator Feinstein affirmed her support clearly and eloquently:

“Having heard from the highly dedicated and enthusiastic rockhounding community on this issue, I worked to accommodate their interests in the California Desert Conservation and Recreation Act (S.414)—the impetus for the President’s recent designation of the aforementioned national monuments [Mojave Trails, Sand to Snow, and Castle Mountains]. That bill made clear that the Secretary shall continue to authorize rockhounding (see Sec. 101).”

Like the rockhounding community, Senator Feinstein sought clarification from Secretary Jewell on what the interim and final Management Plan would provide, noting that rockhounding historically has been and should continue to be accommodated. As the leading proponent championing the
National Monument designations in California, Senator Feinstein’s opinion is more consequential than that of any other public figure (except the President).

In closing, she wrote: “I am confident that the BLM, Forest Service, and National Park Service will continue to support public access and recreation in their management of these national monuments. And I hope that your Department [Interior] will consider the benefits of allowing continued rockhounding and hobbyists collecting, where suitable.”

We would like to clarify the meaning of “where suitable” is within the Mojave Trails National Monument. Below is a list of the some of the important collecting areas which concern us, but it is not a comprehensive list. In addition, this letter enumerates some specific issues that we would like to see addressed in the Management Plan.

**COLLECTING AREAS IN THE MOJAVE TRAILS NATIONAL MONUMENT**

Many longtime favorite collecting areas for amateur rockhounds and fossil collectors – some dating back 100 years or more – are located within the boundaries of the newly created national monument. Given their historical, cultural, and recreational value to our community, preservation of their uses and continued access to them. They include but are not limited to collecting areas given below.

**Afton Canyon**
This area has long been a rockhound area that has many types of agate, sagenite, jasper and opalite. The Afton Canyon collecting area is located at the I-15, at the Afton Turnoff about 32 miles east of Barstow and 25 miles west of Baker. It connects with the collecting areas in North Cady. We ask the BLM to specify that roads and trails providing access to these areas, including roads and trails passing through adjacent lands, should be maintained for vehicular access.

**Bristol Mountains**
Onyx. The Strawberry Onyx Mine is located at: 34.778564 LAT; -116.100632 LONG. It is a 2-mile trek from nearest access road.

**Cadiz (Siam Siding)**
Agate (chapenite). South of the railroad near Danby.

**Cady Mountains** (north and south, see enclosed map and enclosed photos of specimen examples)
Agate, seam agate, chalcedony, geodes, jasper. The main rock collecting areas are located within a rectangle that is 12 miles wide east to west – within Ranges 6 East and 7 East – and 30 miles long south to north – within Townships 7, 8, 9, 10 and 11 North. In the South Cady mountains, the most productive areas for rocks are north of the power line roads and NW of Ludlow in sections 28, 29, 24, 14. Another area is about 5 miles SW of Broadwell Dry lake, off of Crucero Rd. In the North Cady Mountains, locations for excellent seam, tube, banded and moss agate can be found north of Baxter wash and in the wash.

**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 Area 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.
Hector Hills and Pisgah Crater
Unique geological features are found at the Pisgah lava flow and the Hector Hills collecting area. The Pisgah Crater is one mile south of I-40 off of Route 66. The latter is located at T8N, R5E, Sections 4, 5, 6, 15, 16, 21 and 22 (Newberry Springs DAG). We ask that BLM ensures access on Pisgah Crater Road.

Lavic and Jasper Hill
Jasper collecting areas are located within the Route 66 viewshed, between Ludlow and Newberry Springs. The Lavic and Jasper Hill collecting areas are 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).

Thulite spot.
Thulite is is found in the hills south of 34.720566 LAT; -115.975555 LONG. This area is near the pipeline road and provides easy access for the elderly, disabled, and families. Pink chalcedony can also be found there.

Specific Points to Include/Issues to Address in the Mojave Trails Management Plan
Note: Proposed text for the Mojave Trails MH is modeled after the Management Plan for the Carrizo Plain National Monument. Emendations to the Carrizo NM text below are [enclosed within square brackets and underlined.]

- **West Mojave Route Network Project.** All the recommendations herein should be carried into the WMRNP Amendment Plan for consistent application and protections.

  - **Add:** “Rockhounding”, “rock collecting”, and “fossil collecting” (collectively “rock collecting”) is an activity consistent with the monument Proclamation.

- **Allowable Use.** To all instances of “allowable use” that includes other recreational activities, add “rock collecting.” For example, “Appropriate public use would include non-mechanized activities such hiking, equestrian use, hunting, [rock collecting], and dispersed camping.”

- Travelways that provide access to collecting areas should not be designated “unneeded” or “redundant”.

- **Realty Actions and Utility Corridors.** The rock collecting areas listed in this letter and existing access roads to them should be designated permanent “right-of-way avoidance areas.”

  - **Add:** Rock collecting is not limited to collecting only surficial finds. Digging/excavating small holes and crevices using hand tools is allowed.

- **Extractable minerals.** Rock collecting should be explicitly differentiated/excluded from other activities limited by the broad constraints applicable under the rubric “extractable minerals.”

- **Private mineral estates.** Access to and development of claims or private estates located within the monument should not be limited so as to render them practically unworkable, nor inhibited by prohibitive fees that conflict with precedent or historical practice. (e.g., the General Mining Law of 1872.)

- **Recreation Management Zones**

  Management objective
Manage this zone to provide opportunities for visitors to engage in the targeted activities in a short time frame; for primarily day-use [and short duration overnight field trips] to gain knowledge of surrounding cultural and natural resources of the CPNM though interpretation and self-discovery. Motorized access will be limited to designated roads to protect the sensitive natural and cultural resources contained in this zone. [Preserve existing roads and trails that enable access, so hiking on foot should not be further than 0.25 miles.] Minimal developments and considerable protection measures will be set to retain and enhance the objects of the Proclamation.

Recreation Opportunity

Add: “rockhounding” and “rock collecting”

Experience

Add: “The opportunity to experience nature as a living museum and to observe in situ direct evidence of the history of the earth’s formation in its natural geological setting together with its natural features such as rocks, minerals, and fossils. Such an experience provides contextualized understanding of nature as a living laboratory and a living classroom.”

Add: “The opportunity to self-collect specimens for study, for non-commercial personal uses such as lapidary use, display, for the formation of mineral, fossil, or geological specimen collections for personal enjoyment and educational edification.”

Frontcountry, Backcountry, Primitive

Benefit

Add: “Preserve the historical and cultural legacy of rock and fossil collecting areas, access to them, and accommodate rock collecting activity as a recreational use.”

Add: “Sustainability of the cultural heritage and historical value of areas known for their unique or distinctive geological features, minerals, fossils, or rock assemblages.”

- **Primitive Zone Objectives, Management Actions, and Allowable Use**

  Objectives

  Add: “Facilitate access to collecting areas so that parking and staging areas do not require packing in or hiking on foot over distances greater than .25 miles.”

  Add: “Existing roads and trails that provide access to collecting areas shall remain open.”

  Add: “Maintain existing staging areas or provide reasonable alternative sites (e.g., parking areas and campsites) that provide access to collecting areas.”

  Allowable Use

  Add/Clarify: (example)

  Allowable Use REC-4(P): A variety of non-mechanized recreational activities such as hiking, equestrian use, camping, wildlife viewing, nature photography, [rock collecting] and other activities consistent with the goal of providing a wilderness experience would be allowed.”

Amateur rock and fossil collecting is consistent with the conservation values protected by the National Monument designations, which includes conservation, historical, and educational values, as well as protection of the desert’s fragile ecosystems and habitat. Rockhounds are well known for being responsible stewards – we pack in and pack out, careful not to leave trash or scar the landscape, which we value for its natural beauty and unique flora and fauna. Also, the National
Monument designation is consistent with the Code of Ethics of the American Federation of Mineralogical Societies (AFMS) and its 108 member societies of the CFMS.

Access to public lands is essential to collect, preserve, and exhibit rocks, minerals, and fossils. It provides opportunities to enrich the public’s appreciation of nature. Public lands are both a living outdoor museum and a classroom where students, naturalists, and amateur enthusiasts/recreational users can learn about California’s unique natural resources, geology, and minerals.

Thank you, again, for your consideration of our request. We appreciate the opportunity to provide constructive input on the Mojave Trails National Monument Management Plan. We look forward to reviewing iterative drafts and providing input through the final publication of the Management Plan.

Sincerely,

Paul Williams
President, San Diego Mineral & Gem Society, Inc.

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May 12, 2016

The Honorable Sally Jewell
Secretary
U.S. Department of the Interior
1849 C Street, N.W.
Washington, D.C. 20240

Dear Secretary Jewell:

I write today to ask your Department to make appropriate accommodation for continued rockhounding and other rock collecting by hobbyists in any interim and final management plans for Mojave Trails, Sand to Snow, and Castle Mountains National Monuments. The Bureau of Land Management and U.S. Forest Service have long recognized rockhounding as a legitimate recreational pursuit. I deeply appreciate your work in support of the President’s proclamations, and I trust that the management planning process will thoroughly examine this issue.

The California desert is a geological wonder: Jagged mountain backdrops jutting up from the expansive alluvial fans, bajadas, and stunning playas that dot the landscape, all of which reveal a pre-historic landscape as old as 2.7 billion years. And this landscape is filled with agate, jasper, opal, chalcedony and quartz crystals. The recreational collection of these items by rockhounds and other enthusiasts not only enriches the public’s ability to enjoy and explore the desert, but also serves as a valuable educational tool.

Having heard from the highly dedicated and enthusiastic rockhounding community on this issue, I worked to accommodate their interests in the California Desert Conservation and Recreation Act (S. 414)—the impetus for the President’s recent designation of the three aforementioned national monuments. That bill made clear that the Secretary shall continue to authorize rockhounding (see Sec. 101).

It is my understanding that the President’s proclamations do not prohibit the type of recreational collecting that rockhounds have long enjoyed in this area. Because of
the recent confusion surrounding the authorized uses within these new national monuments, I ask that you confirm the following points in writing:

- Does the President’s recent proclamations designating the Mojave Trails National Monument prohibit rockhounding?

- Prior to issuance of the BLM’s final management plan for the Mojave Trails and Sand to Snow National Monuments, will the BLM’s interim guidance provide for continued rockhounding?

I am confident that the BLM, Forest Service, and National Park Service will continue to support public access and recreation in their management of these national monuments. And I hope that your Department will consider the benefits of allowing continued rockhounding and hobbyist collecting, where suitable.

Sincerely,

Dianne Feinstein
United States Senator

CC: Director Neil Kornze, Bureau of Land Management
    Chief Thomas L. Tidwell, U.S. Forest Service
    Director Jon Jarvis, National Park Service

DF/kr/ih
Mojave Trails National Monument. BLM map. The main rock collecting areas in the Cady Mountains are within the monument. They are distributed over an area of about 12 x 30 miles (see: green rectangular, upper left).
Crazy lace patterns of jasper and agate are characteristic of the material found in the Cady Mountains.

Left: A polished slab of jasper with a drusy vug at lower right.  
Right: A cabochon pendant carved from material collected in the Cady Mountains.

Collection and photos: John J. Pickett.
Top left. Flame agate that grew cactus on top. Cady Mountains. Photo: Diana Brady George.

Top right. Lavender tube agate. Cady Mountains. Photo: Diana Brady George.

Left. Pseudomorph agate from across the way of sicat. Note the star over one of the risers. Cady Mountains. Photo: Diana Brady George.
Top left and right: Sleeping Beauty or Sidewinder. Resembles tubes trapped in agate, Cady Mountains. Photos: Diana Brady George.

Left: A piece of the orange lacing off the top of a piece of Sicat Plume Agate. There was a section of the seam that was covered in this lacy tops. Cady Mountains. Photo: Diana Brady George.
Top left. Sicat Plume Agate, Cady Mountains. Photo: Diana Brady George.

Top right. A small piece of a cave area in the Sicat Dig. There is a drusy covering in these stalactite-like pieces. Several that were dug out were about the size of a large grapefruit. Cady Mountains. Photo: Diana Brady George.

Left. A cave-like agate from Agate Cave was once near the Picket Plume. Most of the material from this dig was filled in with pink-colored flames. Cady Mountains. Photo: Diana Brady George.
Top left. Bubbly agate with red stringers; from in an area above the Stinkhole Dig. This specimen was found in blow sand. It probably was formed in a cave-like area in the mountain before the hillside settled. Agate Cave, Cady Mountains. Photo: Diana Brady George.

Top right. There was a lot of tube-like agate in parts of the Stinkhole Dig. Most has red flower like plumes. Cady Mountains. Photo: Diana Brady George.

Left. Moss agate. Material from the backside of the mountain seems to have darker green colors. Cady Mountains. Photo: Diana Brady George.