

ATTN: GSENM/KEPA Draft RMPs/EIS  
669 S. Hwy 89A  
Kanab, UT 84741

November 12, 2018

Re: GSENM-KEPA RMPs-EIS Vol. 1-508, Comment on Grand Staircase-Escalante National Monument and Kanab-Escalante Planning Area Draft Resource Management Plans and Environmental Impact Statement

To Whom It May Concern,

This letter is written by the Peninsula Gem and Geology Society (PGGS) of Los Altos, CA, with support from other organizations and professionals concerned with preserving, responsibly collecting of rocks, minerals, and fossils. PGGS is a non-profit organization with 83 dues-paying members. To advance our goals of research and education, PGGS members use their personal collections in presenting programs to the general public, elementary schools, and other community groups of northern Santa Clara County, CA. We are not unique in this respect. Most Rock, Mineral, and Fossil Clubs/Societies in California in general, and the San Francisco Bay Area in particular, work with their local schools, libraries, museums, and universities.

PGGS is a member of both the American Federation of Mineralogical Societies (AFMS) and its regional affiliate, the California Federation of Mineralogical Societies (CFMS). CFMS represents 110 gem-mineral-lapidary-fossil societies located primarily (but not exclusively) in the State of California. CFMS represents 8,747 dues-paying members in aggregate. AFMS represents seven regional affiliates with 50,460 members in aggregate throughout the United States. CFMS and other AFMS regional federations and their affiliated societies are signatories to this letter not only because of values shared in common concerning avocational earth sciences, but also because the proposed alternatives affect collecting and managing non-fossil geological resources for recreation and education (“rock collecting” or “rock hounding”).

This comment letter is submitted by the Peninsula Gem and Geology Society with the support of other organizations and individuals concerned with the management of the Kanab-Escalante Planning Area and the Grand Staircase-Escalante National Monument units. The signatories to this letter support all of the provisions in **Alternative D (our preferred alternative)**, which would allow casual surface collecting of common rock, mineral, and fossil resources, **for personal use only** without permits, except in areas closed to such collecting because resources are of critical scientific value or unless such resources are of critical scientific or recreational value and need to be protected 1.

We support the Management Actions incorporated into Alternative D, specific to the Kanab-Escalante Planning Area listed under Record #1050 and #1051 (in the Draft Resource Management Plans and Environmental Impact Statement), and the Management Actions incorporated in Alternative D specific to units of the Grand Staircase National Monument listed under Record #1048 and #1049, which would allow casual collecting in designated and posted areas within the monument. Additionally, we support the Travel Management provisions of Alternative D listed under Record #2101 and #2102. Routes for motorized travel are essential in providing access to a majority of the public, including children, the elderly, and the handicapped.

Alternative D is consistent with the Resources Preservation Act: The Secretary shall allow casual collecting without a permit on Federal land controlled or administered by the Bureau of Land Management, the Bureau of Reclamation, and the Forest Service, where such collection is consistent with the laws governing the management of those Federal lands and this subtitle 2. No statute states that National Monuments managed by the BLM shall be closed to casual collecting. The BLM retains the authority to restrict casual collecting, within specific areas, with reason, to protect critical resources. Congress clearly expressed solicitude for public hobby collecting of fossils in the 2009 PRPA and designated BLM and National Forest lands as appropriate for that activity. As more BLM lands are placed within special management units such as national monuments, a prohibition of casual collecting within all special management units would shrink the area available to the public for this recreational and educational activity to far less than what existed or was envisioned in 2009, defeating the intent of the statute in regard to its casual collecting provision.

Hobby collecting of non-fossil rocks and minerals is not specifically discussed in the GSENMKEPA DRMP & EIS, except in section 3 page 44: Alternative D would also allow casual collection of rocks, minerals, and petrified wood across the entirety of KEPA. Rock and mineral collecting is a traditional hobby across the American West, with significant participation by families, and an activity of educational merit. Before the establishment of the GSENM in 1996, the area was frequented by rock collectors. It is disappointing that the Analysis of the Management Situation and the other GSENM-KEPA planning documents lack discussion of non-fossil rock collecting and how it might be accommodated. That the Preferred Alternative (D) does provide the public with opportunities for hobby collecting of rocks and minerals is an important positive feature and we commend the BLM for this.

We would oppose ACEC designations if large areas were to be removed from casual collecting due to limited occurrence of critical resources. Widespread prohibition of casual collecting of common rocks, minerals, and fossils is not necessary to protect sensitive and discrete areas. The BLM needs to exercise good judgment in restricting casual collecting in the proposed ACECs, including Circle Cliffs and Cockscomb East, if these are approved. Most common invertebrate fossils are of marine origin and are not found in the same formations as dinosaur bones, and thus common invertebrate fossils and dinosaur bones typically do not occur in the same localized area. Invertebrate fossils are easily distinguished from fossil bone and hobby collectors are unlikely to confuse them.

In summary: We support the provisions of Alternative D, including the casual collecting provision across the entirety of KEPA and select areas of the GSENM, because we believe this will most fully realize the scientific value, and the educational and recreational value, of the earth science resources and will not harm critical paleontological resources.

Sincerely,

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Stan Bogosian, President  
Peninsula Gem and Geology Society Inc.  
(Representing 83 dues-paying members)  
P.O. Box 4062  
Los Altos, CA 94024-0062  
Web Page: <http://pggs.org/>