

[bull] Define Locatable Minerals to include "gemstones and other valuable, uncommon non-metallic minerals,[rdquo] as the BLM general guidance to the public does. 43 CFR 3809.2(e), for example uses [ldquo][hellip]. and a number of other non-metallic minerals that have a unique property which gives the deposit a distinct and special value."

[bull] I believe that any proposed text provision for violation penalties of 12 months in jail and/or fines of \$100,000 for an individual involved in a [ldquo]Notice-Level[rdquo] operation would clearly trigger need for a NEPA EIS, not an EA, as the decision document of a FONSI would be clearly breached and would invite a lawsuit. Similarly, the cost impact for new and increased Notice-level staff consultations, pre-POO-submission discussions, reviews of draft POOs, POO amendments, prescribed POO periodic reviews on a set time schedule, etc., etc., cannot be in the realm of a FONSI-level EA decision document.