

Peter S. Adams, Trustee
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September 9, 2025

San Bernardino County Government Center
Chamber of Board of Supervisors
385 North Arrowhead Avenue, First Floor
San Bernardino, CA 92415

Dear Honorable Board of Supervisors:

I am the Trustee for the Family Trust named above, and the Owner of 305 acres of patented mining claims and an additional 155 acres of unpatented claims, all about 2 miles North of the town of Randsburg, in Kern County. I've been working on developing my property for placer gold mining for about 40 years, while making my primary career in Northern California.

Mr. Tucker and his company Gold Discovery Group LLC are neighbors of mine and we are both in the mining development business. I first met Mr. Tucker in 2020. We have developed a strong bond over the past 5 years, discussing in detail the challenges that face all gold miners in the State of California, and making various arrangements to support each other's efforts

In my experience with Mr. Tucker, he is a unique person in the mining industry, for several reasons.

For one, he has high integrity. He is very clear about his plans and intentions, and follows through on whatever commitments he makes. A rare quality in Any industry. When he commits to do something, one can count on him to ensure it happens.

Secondly, Mr Tucker has a keen interest in environmental issues, and being a "good citizen" and volunteer in his local community. Mr Tucker has shared with me how he works closely with environmental interest groups to understand their concerns and properly mitigate them in his planned operations. For example, he and his employees have actively engaged the Desert Tortoise Council and the Desert Tortoise Preserve Committee over the past several years, and he has educated himself and his employees to be fully aware of the dangers the Mojave Desert Tortoise faces in the desert and how they all might assist in the arrest of their decline. In fact, Mr. Tucker's efforts to save the Mojave Desert Tortoise have been recognized by the Desert Tortoise Council as evidenced by their request to have Mr. Tucker be a guest speaker at their 50th Annual Symposium in Las Vegas this past February.

Mr Tucker also has a strong record of following through on his reclamation obligations from his operations so far. His team have drilled over 400 holes in our area near Johannesburg and near Atolia, and dug two sizeable trenches within the proposed Persistence Mine footprint. His reclamation of these 400 drill holes, access roads and trenches have more than met the requirements of his permits.

Mr. Tucker and his company are also Adopt-a-Highway volunteers for both San Bernardino and Kern Counties, volunteering to clean up a 4-mile stretch. They have also sponsored the Randsburg Old West Days for the past 2 years, providing free food to all attendees. Finally, Mr. Tucker with his family and employees, also took part in the spring cleanup of the Johannesburg city cemetery.

Mr Tucker and his company have applied for a Reclamation Plan and permit for the Persistence mine, to the Board of Supervisors. The Board should have every confidence that Mr Tucker and his company have the skillset and integrity to follow through with whatever commitments they will make in that Plan, in addition to bringing jobs, tax revenues and charitable benefits to San Bernardino County and the local community in and near Atolia.

Sincerely,



Peter S. Adams
Trustee

From: [Randall Porter](#)
To: [Newland, Derek](#)
Subject: Fw: Comments on MRP-2023-00001, Gold Discovery Group
Date: Monday, September 1, 2025 1:22:54 PM

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----- Forwarded Message -----

From: Randall Porter <randall_k_porter@yahoo.com>
To: derek.newland@lus.sbcounty.gov <derek.newland@lus.sbcounty.gov>
Sent: Monday, September 1, 2025 at 12:47:00 PM PDT
Subject: Comments on MRP-2023-00001, Gold Discovery Group

Mr. Newland:

Thank you for speaking with me. I have a few minor suggestions and comments on the GDG application.

1. The Department of Conservation states- "By way of a Memorandum of Understanding between the Department of Conservation, the Bureau of Land Management (BLM), and the U.S. Forest Service (USFS), have agreed that the statutes and regulations of SMARA are applicable to lands regulated by BLM and the USFS. Under the terms of the agreement, the local lead agency remains the lead agency and has the main responsibility to enforce the requirements of SMARA. The lead agency works cooperatively with the federal agencies to assure that the requirements of the local ordinances, state statutes and regulations and federal requirements are met. • Lead agency status cannot be delegated to the federal agency. • The local lead agency must require and approve (after review by the Department of Conservation) a reclamation plan and financial assurances. (Lead agencies may accept operation plans, reclamation plans and environmental studies that meet BLM and USFS, provided they meet the requirements of SMARA.) • ***The financial assurances must be payable to the appropriate federal agency, as well as to the lead agency and the Department of Conservation.*** • The local lead agency retains responsibility for annual inspections. For the mine operator: • Mining claims with the appropriate federal agency, and claim maintenance fees are still required. • Mine operators are still required to submit annual reports and annual reporting fees to the Department of Conservation."

This means the Surety Bond for GDG must name the Ridgecrest BLM Field Manager as well as San Bernardino County and California Dept. of Conservation.

See <https://conservation.ca.gov/dmr/publications/Documents/SMARA%20FAQ.pdf>

2. Sections 14 and 15 of annual Mining Report Form MRRC-2 require reporting the assessed value of the operation and the amount of gold/silver produced. This means GDG is required to submit form BOE-560-C to the San Bernardino County Assessor, and account for it to Dept of Conservation. You might wish to mention this in your SMARA approval.

3. SMARA lead agencies have traditionally felt that County governments do not have authority to do approve mine operations on federal land, and limit their CEQA analysis to reclamation only. Nonetheless, a California court HAS ruled that CEQA requires analysis for the effect of mining, and the CEQA analysis is incomplete otherwise. Please discuss the decision at <https://hthglaw.com/california-court-clarifies-ceqa-review-mining-operations-federal-land/> with either the Dept of Conservation and/or your Counsel.

Good Luck!

Sincerely,

Randall Porter
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