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8 CENTER FOR BIOLOGICAL DIVERSITY and
DESERT PROTECTIVE COUNCIL

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10 SUPERIOR COURT OF CALIFORNIA
11 COUNTY OF SACRAMENTO

12 CENTER FOR BIOLOGICAL DIVERSITY, a
non-profit corporation; and DESERT
13 PROTECTIVE COUNCIL, a non-profit
corporation;

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15 Petitioners,

16 v.

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18 CALIFORNIA DEPARTMENT OF PARKS
AND RECREATION; CALIFORNIA
19 DEPARTMENT OF GENERAL SERVICES;
and DOES 1 - 20, inclusive;

20
21 Respondents.

22 CALIFORNIA OFF ROAD VEHICLE
ASSOCIATION; and DOES 21 through 40,

23
24 Real Parties in Interest.

Case No.: 07CS00077

**DECLARATION OF DAVID BLOOM IN
SUPPORT OF PETITIONERS' MOTION
FOR STAY**

Date: January 26, 2007

Time: 11 a.m.

Dept: 11

Judge: Hon. Gail Ohanesian

Action Filed: January 19, 2007

DECLARATION OF DAVID BLOOM

I, David Bloom, do hereby declare as follows:

- 1) The facts set forth in this declaration are based on my personal knowledge and if called as a witness, I could and would competently testify thereto under oath. As to those matters that reflect a matter of opinion, they reflect my professional opinion and judgment upon the matter.
- 2) I am an environmental geologist working for General Dynamics. Previously, I worked for Ninyo & Moore. I am certified as a California Professional Geologist, California Certified Hydrogeologist, and California Certified Engineering Geologist. From 2000 to the present, I have been an appointed member of Technical Advisory Committee and Subject Matter Expert, California Board for Geologists and Geophysicists, Sacramento, CA. I hold a BA degree in geology from Pomona College. Since June 2005, a major focus of my research has been the geology of the southern California deserts in general and in particular the Imperial Valley and southeastern San Diego County area. I have served as an officer of the San Diego Association of Geologists for three years. In 2007 I am serving as president SDAG. It is part of SDAG's mission to make the geology of our region better known to our member geologists and the general public. My curriculum vitae, including a list of published research papers, is attached.
- 3) I am familiar with the Desert Cahuilla acquisition lands and neighboring lands in Anza-Borrego Desert State Park and Ocotillo Wells State Vehicle Recreation Area. This area is relatively unspoiled. It has unique geological features that have been inadequately studied. As a professional geologist in the State of California, I believe that before permitting major off road activities in this area that a thorough evaluation of geologic as well as other natural

and cultural resources be performed. Once damaged, subtle, unique, and poorly studied features can be lost forever. I have seen damage done to the yardangs (elongate wind-sculpted hills and mounds) of the San Felipe Hills, part of the Ocotillo Wells State Vehicle Recreation Area. These features are, or I should say, were, the best examples of their type that I know of in California. They have been damaged, many beyond recognition. This kind of damage cannot be reversed through restoration efforts.

- 4) I understand that State Parks intends permit a major off-road event in the Desert Cahuilla area near Anza-Borrego Desert State Park for the January 20-21, 2007 weekend. I am concerned that allowing this event and other ongoing off road vehicle use on these lands will permanently damage the geological features of the area before baseline environmental data can be gathered in order to undertake a meaningful environmental assessment of the site. State Parks should not allow any additional impacts to the geological resources and other natural and cultural resources from off-road vehicles use in this area. If the event goes forward as planned, we may lose even more unique geological formations and irreparably damage these precious resources.
- 5) I declare under the penalty of perjury that the foregoing is true and correct and was executed this 18 day of January, 2007 at San Diego, California.



David M. Bloom, BA
President, San Diego Association of Geologists

David M. Bloom

Project Manager / Senior Environmental Geologist

QUALIFICATIONS

Professional experience consulting in the environmental geology field since 1990, currently a project manager supporting environmental projects for primarily U.S. Navy customers in the southern California region.

EDUCATION

BA, 1985, Geology, Pomona College, California.

Graduate courses in hydrogeology and multi-phase flow, Geological Sciences, SDSU, Calif.

PROFESSIONAL EXPERIENCE:

Anteon (General Dynamics as of 6/8/06), San Diego, CA. – 2002-Present

Environmental Support for various Naval activities and facilities in the Southwest region.

Ninyo & Moore, San Diego, CA. – 1993 - 2002

Environmental Investigations and groundwater resource studies for various governmental, commercial, and private clients, including contamination assessments, environmental site assessments, and CEQA/NEPA technical support.

Geraghty & Miller, Inc., West Covina, CA – 1990 - 1992

Field geologist primarily at contaminated industrial sites in southern and central California where groundwater was affected by hazardous materials and wastes.

Benton Engineering, Inc., San Diego, CA – 1990

Collected, processed, prepared, and tested soil samples for foundation design.

PUBLICATIONS AND PRESENTATIONS

Lead editor, "Geology and History of Southeastern San Diego County, California" published by San Diego Association of Geologists, San Diego, 2006.

Officer since 2004 and current President, San Diego Association of Geologists.

Appointed Member of Technical Advisory Committee and Subject Matter Expert, California Board for Geologists and Geophysicists, Sacramento, CA. Participate in quarterly TAC meetings to advise the Board. Attend workshops to improve State licensing examinations and establish passing scores. Wrote items for California Geology, Engineering Geology, and Hydrogeology specialty examinations, April 2000-present.

Co-Author "Painting the PCB Picture" published in Environmental Protection magazine, October 2000.

CERTIFICATIONS

California Professional Geologist #6192, 1995

David M. Bloom, cont.

California Certified Hydrogeologist #585, 1998

California Certified Engineering Geologist #2111, 1998

Hazardous Materials Management Professional Certificate, University of California, San Diego, 1994

Site Assessment and Mitigation Professional Certificate, University of California, San Diego, 1996