

DOCKET

09-Renew-EO-01

DATE	DEC 05 2010
RECD.	DEC 05 2010

From:
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Date: December 5th. 2010

TO:
California Energy Commission
Dockets Unit, MS-4
Re: Docket No. 09-Renew EO-01
1516 Ninth Street
Sacramento, CA 95814-5512
docket@energy.state.ca.us

Re: **BEST MANAGEMENT PRACTICES MANUAL, NOVEMBER 2010 REVISION**
Docket No.09-Renew EO-01

Please consider the following commentary and suggestions in regards to the BEST MANAGEMENT PRACTICES MANUAL, NOVEMBER 2010 REVISION

Previously Submitted Electronically Under The File Name;
'MTG DAVID BEAUMONT BMP COMMENTS 12-5-10";
and by United States Postal Service on 12-6-2010.

Sincerely,

David Beaumont
Mojave Trails Group

Submission for your consideration concerning the DRECP document, BEST MANAGEMENT PRACTICES, November 2010 revision:

It is greatly appreciated that in this current version of the BMP, and the associated errata, that recreational and off-road interests have been included.

For the sake of clarification, and in an effort to be all inclusive in regards to input from public land managers and the public at large, we offer the following for your consideration:

1) We're a little confused when it comes to not including a broader range of land managers in the meeting process initiated by project developers as described in **Chapter 2, Section 3**. Under "**Initiating Permitting Processes**", **item number 3**. While the list as it is currently drawn certainly is relevant, we think we may have identified an inadvertent omission. Outlying lands under management by any governmental agency may be affected in much the same manner as public park lands, and it seems to follow, should be given the same considerations as the various park types already listed. Potentially affected public access or public use, are not necessarily confined to an area which might be generally labeled as a "public park". One example is BLM lands. For the contributors to this commentary they are of great concern, they form the core of lands for our desert experience. We would hope that BLM district managers or any other affected entity, could voice their opinions and knowledge to the project developers in an effort to maintain a quality outdoors experience in these non-park lands for ours and the public's benefit.

2) As a general rule of thumb, and where ever applicable, please consider that many members of the public at large may not belong to any organized recreational user group or even an informal club. For this reason, we ask that you consider adding the concept of "individuals" offering recreational input into the processes with project developers. We know they can contribute already, we're just asking that an open invitation for such be readable inside this document and any public notices which project developers may use to announce their meetings.

Our effort here is to improve the quality, and completeness, of the information gathered by project developers. It is often that such individuals, those lone wanderers of the desert who have no allegiance to any entity other than the desert itself, know more about our desert than most. They should be encouraged to come forward.

3) Under **CHAPTER 3: General Pre-Application Filing Guidance & Best Management Practices** under **Land Use/Agriculture Guidance**, **item number 11**.

Please note the quotes below in *italics* are taken from the current BMP in the section under discussion here.

It needs to be made clear that: a) "*public access...*" is not necessarily confined to a "public park"; b) "*public access and public park land impacts...*" means any reduction in or elimination of access or uses; c) "*...related, appropriate measures to address the impacts*" means to move or otherwise replace the losses to use or access.

It is also our desire that you add equestrian interests to the list of uses and clarify that vehicle access may include off highway vehicles on dirt roads, unincorporated paved roads, ways, routes, trails or areas. This might also be a location to include an analysis of impacts to all forms of general public recreation such as camping, rock hounding, spiritual quests, etc.

Use maps to show pre-permitting studies results and recreational and public access locations, facilities, roads, ways, routes, trails, fences, and other infrastructure sites relative to recreation and public use. Requested map scaling should be 7.5 minute.

END