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09-RENEW EO-1

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RECD. OCT 27 2010

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Docket No. 09 RENEW EO-01

Please consider the following for inclusion in the BEST MANAGEMENT PRACTICES MANUAL.

I) Add at Chapter 2, Page 16, item 16):

Initiating Permitting Processes

Meet with recreational groups and recreational users six to twelve months before filing applications with the appropriate lead agencies to involve such recreational users, including motor vehicle off-highway users, and all other public use interests, during early stages of project planning and development and inform them of the project and its potential benefits and impacts. Be aware that use may be intermittent and some effort may be required to identify whether or not recreational activity is taking place. Obtain input and begin identifying issues. This should be an ongoing process, as interested parties come forward, resulting in a series of meetings.

When developing applications for lead agencies, list the organizations, Groups, and individuals consulted, summarize their comments and concerns, and describe what has been done to address these concerns. Refer to **Chapter 3** sections on environmental justice for more information concerning public outreach.

II) Add to Chapter 3, where appropriate:

CHAPTER 3: General Pre-Application Filing Guidance & Best Management Practices

Considering that “impacts” and “cultural and human ...impacts” must necessarily include outdoor recreation in all the varied forms it takes within our diverse culture, we request that the following Item be added to the BMP listed here in chapter 3:

Outdoor Recreation and Public Access to the Desert.

- 1) Identify recreational pursuits and access means that will be impacted by the site location. These can include roads, including dirt roads, ways, routes, and trails, and open access areas, used for foot, animal, or vehicle

access. Consult with recreational groups that have an interest in the area. These could include hikers, hunters, photographers, off-roaders, etc. Please be aware that this list could be as broad as there are people visiting the desert and that each idea of use is as valuable as the next. Include any activities that occur on the site property or use the site property for access to another area. It is particularly important to identify travel routes that might cross the property in order to access other areas, as the use of these might not be obvious.

- 2) Make an attempt to relocate on-site activities to other areas. This is a good opportunity to meet and work with recreation groups, leaders and participants and others who engage in recreational activities.
- 3) If access means such as roads, ways and trails cannot be kept open, look for ways to relocate them around or otherwise outside of the facility.
- 4) If access means or open access areas cannot be kept open, work with users to mitigate any closure by obtaining routes or open access areas in another place.

Outdoor Recreation BMPs

- 1) Show access means that are on the site such as roads, routes, ways, and trails, and open access areas on maps.
- 2) Determine and map alternate access means around the site where necessary.
- 3) Determine alternate areas for recreation activities that must be moved from the site. Public users of the area can possibly provide a variety of alternatives.