## 0022255

 From:
 Rich Sussman

 To:
 Mike Murray

 Cc:
 Jami Hammond

Subject: Re: periodic review question Date: 12/02/2008 01:34 PM

Mike, I have some thoughts that I would like to discuss that emanate from the way we approach GMPs. It may have some relevance for what you are contemplating. Please send me the information on the conference call on Friday--I will be at CUIS with David, and have an 11:18am flight back to ATL.. I would also like Jami to participate in the discussion.

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Mike Murray/CAHA/NPS

Mike

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To Rich Sussman/Atlanta/NPS@NPS

cc Jami Hammond/Atlanta/NPS@NPS, Darrell

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12/02/2008 12:57 PM

Subject periodic review question

Hi Rich,

Are you aware of any good examples of management plans describing a process to perform periodic review of the management plan results and then make changes, if needed? I've seen a number of plans that mention periodic review, but none that describe how it will be done (other than maybe a time frame such as "annually" or "no less often than every five years."

My interest relates to our ORV management planning process. The need for periodic review and adjustments keeps coming up again and again in the negotiated rulemaking committee discussions. The plan seems headed for a zoning approach to identifying sensitive resource areas, congested pedestrian areas and other recreational use areas, and then designating ORV areas and non-ORV areas, management actions, use restrictions, etc. based on those zones. While this makes sense and is in keeping with the executive orders on ORV management, given the dynamic nature of a barrier island system, a few years of erosion or a single major storm event will likely change the landscape to the extent that in the near future a segment of beach may need to be "reclassified" to a different category (e.g., an ORV area may need to become a non-ORV area, or vice versa).

Sandy Hamilton (EQD) and I have a phone call with SER and WASO Solicitors on Friday to talk about ways to include "periodic review" (presumably to review the situation every 3-5 years and potentially reclassify a few segments of beach, if warranted, every few years.

Ideally, we would like to be able to make those classification changes in the future based on "periodic review," without triggering burdensome compliance and regulatory requirement (i.e., I don't want to have to do a new EIS or revise the regulation every few years). In general, the overall management methodology (management specific to each zone type, etc.) would remain the same; but some beach segments may need to be switched from one zone type to a different one if conditions change, which would change the management, restrictions, etc. of that segment.

Any thoughts or suggestions on good examples of "periodic review process or criteria" to consider would be appreciated.

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