

Mr. Mike Capps, President, Mohave Underground, Inc. ,

Our office recently became aware of Mohave Underground, Inc. and its activities. After reviewing the information available on your website, BLM needs to develop more information about Mohave Underground's activities on public lands within the BLM West Desert District. You have numerous locations listed on your site that fall within the BLM Salt Lake and Fillmore Field Offices. BLM has some concerns regarding resource impacts, private property rights, and federal requirements for Special Recreation Permits (SRP) for commercial and/or organized group activities on public lands.

In accordance with the Code of Federal Regulations (43 CFR Subpart 2932.11), a SRP is required on public lands for all commercial operations or for organized group activities where BLM determines it is necessary to provide specific management or monitoring to adequately address public health and safety and/or mitigate potential impacts to natural resources.

Our office needs to develop more specific information about your group to properly evaluate BLM resource concerns and potential permit requirements. In order to facilitate this, please provide us with specific answers to the following list of basic questions about your group's activities on public lands:

- Do you maintain a list of registered members?
- Do you ever make arrangements thru your membership list for groups to meet and travel together to specific destinations? If so, when and where in the last year?
- How do these groups travel to these sites and do vehicles ever have to go cross-country or off roads?
- Have you ever entered mine openings and/or surface structures with groups at the sites you visit?
- Have you ever taken any groups into mines or structures that you yourself have not previously been to or inside of?
- How do you determine structural integrity or safe air quality in the mines or structures that you may enter?
- Do you employ any type of trained mining or structural engineers or air quality specialists at your events? If so, who and what type of certifications do they have?
- Do any persons at Mohave Underground events wear any kind of safety equipment prior to entering mine openings? If so, what types?
- Do you conduct safety briefings with participants at your events?
- Do you have any persons with first aid or emergency fire responder training at your events?
- What types of communications devices do you carry on your outings?
- Do any of your events ever take place on private land and if so, have you obtained landowner permissions to do so?
- Do you have registration fees to attend any Mohave Underground events? If so, which ones?
- Do you provide catering services and discount vendor sales at any events?
- Do on-site food vendors have permits from BLM or local health departments?
- Do you sell products on your website?
- Do you have commercial sponsors on your website and in attendance at any of your events?
- Have you ever generated revenue from any of your events in the form of payments of money, on-site sales or rentals, gifts, gratuities, donations, bartering, or any other form of compensation?
- Do you have a business license with the State of Utah? If so, what type of business are you listed as and is it current?
- Have you ever encountered bats or other wildlife at any of the sites you have visited?

- Does your organization maintain any type of current public liability insurance for its activities and with what coverage limits?

Thank you for your time. BLM looks forward to your cooperation in this matter.

Ray Kelsey
Outdoor Recreation Planner
BLM Salt Lake Field Office
2370 South 2300 West
Salt Lake City, UT 84119
Office: 801-977-4333
Fax: 801-977-4397
http://www.blm.gov/ut/st/en/fo/salt_lake.html