



November 17, 2016

National Park Service  
Submitted electronically @  
<http://parkplanning.nps.gov/DO100>

Re: National Park Service Director's Order #100  
Project #65454

Dear Sirs:

Please accept this correspondence as the concerns relating to the proposed National Park Service (NPS) Director's Order #100 ("DO#100") submitted on behalf of ORBA, CSA, TPA and COHVCO. We start first with a brief description of each Organization.

The Colorado Off-Highway Vehicle Coalition ("COHVCO") is a grassroots advocacy organization of 150,000 registered OHV users in Colorado seeking to represent, assist, educate, and empower all OHV recreationists in the protection and promotion of off-highway motorized recreation throughout Colorado. COHVCO is an environmental organization that advocates and promotes the responsible use and conservation of our public lands and natural resources to preserve their aesthetic and recreational qualities for future generations.

The Trail Preservation Alliance ("TPA") is a Colorado based 100 percent volunteer organization whose intention is to be a viable partner, working with the United States Forest Service (USFS) and the Bureau of Land Management (BLM) to preserve the sport of trail riding. The TPA is an advocate of the sport and takes necessary actions to help insure that the USFS and BLM allocate to trail riding a fair and equitable percentage of access to public lands.

The Colorado Snowmobile Association ("CSA") was founded in 1970 to unite winter motorized recreationists across the state to enjoy their passion. There are 30,000 registered snowmobiles in the State of Colorado. CSA seeks to advance, promote and preserve the sport of snowmobiling in Colorado by working with Federal and state land management agencies and local, state and federal legislators.

The Off-Road Business Association (ORBA) is a national not-for-profit trade association of motorized off-road related businesses formed to promote and preserve off-road recreation in

an environmentally responsible manner based in California. For purposes of this document ORBA, CSA, COHVCO and TPA are identified as "the Organizations".

### **Request for Extended Public Comment Period**

The Organizations respectfully request that the comment period for the DO#100 proposal be extended as many interested parties are not aware of the proposal since general public outreach has been very limited. Additionally, the Organizations request that public meetings be conducted at strategic locations throughout the country to allow for more meaningful interaction with the public on the DO#100 proposal and to stimulate public understanding and partnerships to resolve site specific issues that a particular park or area might be facing. The Organizations have found that the addition of public meetings is highly effective in engaging the public and developing meaningful substantive comments, which result in a superior final rule at the end of the rule making process.

### **Director's Order #100 will impair established factors to be balanced in National Park Service managed areas**


The Organizations must express serious concern about the elevation of a single portion, resource protection, of the various interests that are to be balanced in the NPS' mission above other historical usages, which the Organizations submit DO#100 clearly does. While resource protection is clearly an important factor to be balanced in the management of NPS lands, it must be balanced with other factors in order to achieve the mission of the NPS. The Organizations are aware that resource protection has often been weighted too heavily in traditional park areas where a more diverse range of uses is to be protected, such as the Canyonlands NP, where dispersed trail usage is a characteristic to be protected and preserved in the foundational documents. The Organizations submit that recent efforts on permitting of only certain trail usages for the Canyonlands NP have eroded one of the foundational principals to be protected and preserved under a traditional NP model of management. These concerns are more extensive if DO#100 were enacted.

While our concerns are serious even under the more traditional NPS management model, such as Yellowstone NP, Rocky Mountain NP, the Organizations concerns are expanded when DO#100 is applied to areas that are managed under a less traditional park service model, such as the many National Conservation Areas, National Monuments and National Recreation areas. Many of these Congressionally-designated areas have foundational documents that are significantly wider in scope and balance a different set of interests than those that are present under general NPS authority. While the goals and objectives of some monuments, such as the Florissant Fossil Beds National Monument, might align reasonably well with an elevated protection of resources, other units' mission will almost immediately experience conflicts. For example, this would be exemplified in the Lake Mead NRA, where providing diverse water based recreational opportunities along with a management objective to be the Premier Inland

Water Recreation Area in the West are specifically identified as goals.<sup>1</sup> The Organizations are unable to reconcile the clearly stated goal of the Lake Mead NRA with an elevated level of protection of resources. The Organizations vigorously assert that elevating resource protection above other priorities will result in same erosion of opportunities we are seeing with the management of the Canyonlands NP. This is simply unacceptable to the Organizations.

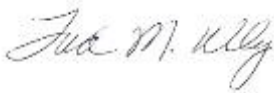
The Organizations look forward to participating in further meetings on this issue and welcome the discussion as it moves forward. Please feel free to contact Scott Jones, Esq at 508 Ashford Drive, Longmont CO 80504 or via email at [scott.jones46@yahoo.com](mailto:scott.jones46@yahoo.com) or via telephone at 518-281-5810.

Respectfully Submitted,



Scott Jones, Esq.  
COHVCO & CSA President  
TPA Authorized Representative

D.E. Riggle  
Director of Operations  
Trails Preservation Alliance



Fred Wiley, ORBA CEO & Executive Director

---

<sup>1</sup> See, Lake Mead NRA Business Plan- Executive Summary – December 1999 at pg 4.