



April 10, 2015

National Park Service -Southeast Utah Group
Att: Planning and Compliance
2282 S. West Resource Blvd.
Moab, UT 84532

Re: White Rim-Elephant Road Permit Proposal

Dear Sirs;

Please accept this correspondence as the comments of the above noted Organizations regarding the proposed permit system on the White Rim and Elephant Hill Trails, hereinafter referred to as "the Proposal". Prior to addressing specific comments on the Proposal, a brief summary of the Organizations is necessary to provide context for these comments. COHVCO is a grassroots advocacy organization representing the 150,000 plus registered OHVs in the State of Colorado. COHVCO is 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.

TPA is a 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 acts as an advocate of the sport and takes the necessary action to insure that the USFS and BLM allocate to trail riding a fair and equitable percentage of access to public lands. For the purposes of these comments, COHVCO and TPA will be referred to as "the Organizations". OHV community has been effectively proactively addressing resource issues for decades in the Moab Utah area and throughout the western

United States. While these routes are outside of Colorado, they represent important riding opportunities to our members when areas in Colorado remain blocked by heavy snowfall.

Executive Summary.

The Organizations are not opposed to the education of users regarding the proper usage of NPS lands, but the Organizations are aware that the scope of educational efforts must be correct. The Organizations are not able to support the Proposal in its current form due the void in supporting documentation around the Proposal to insure the proper scope and targeting of the Proposal. There is simply too much information that has been provided in an informal manner and it has been the Organizations experience that such information is too often misunderstood or lost in translation or with passage of time. The Organizations support ongoing efforts to develop effective management of this area and educate users, but do not believe the Proposal is in a position that can be supported at this time, as it simply needs more development and clarification.

The Organizations submit that a more comprehensive review of all recreational visitation to the White Rim and Elephant Hill areas needs to be undertaken to address all phases of recreational management of these areas. This comprehensive review would include analysis and balancing of guide service visitation, rental operations and tours and overall levels of all types of publicly available recreation in the area. The Organizations submit that education of users accessing the area via permittees or guides is an important issue in resolving management of the area that simply cannot be overlooked and the Organizations are not aware of the scope of education and monitoring that would occur outside the public permit system proposed.

It has been the Organizations experience that often rental and guide based users accessing these Canyonlands routes are simply dropped by guides with little information and then unable to safely traverse the advanced and technical routes due to their novice levels of experience with equipment being rented. Too often our members have encountered large numbers of pieces of rental equipment being blindly pushed up rocky steep hills or through sand washes without a guide in sight by badly sunburned and slightly dehydrated novices that are unable to handle advanced riding conditions. This situation results in safety concerns for all users and conflict with motorized usage traversing these routes as rental users are simply in way over their heads. The Organizations submit that regulation and education of the general public will not resolve the ongoing struggles with management of recreational visitation in the area as a whole.

The Organizations believe there are educational materials already developed that could greatly facilitate the education of all users in the manner sought in the Proposal. The Organizations

are aware that often particular standards are different in NPS vs BLM and USFS but the Organizations believe that the peer to peer format and methodologies of providing this information have already been proven effective and can be applied to NPS in a similar highly effective manner as "Stay the Trail" and "Tread Lightly" have already done on other public lands. As we discussed in our meeting, the Organizations would be more than willing to facilitate any discussions with "Stay the Trail" or "Tread Lightly" in order to aid in the education of users of the White Rim or Elephant Hill trails.

The Organizations wish to thank your office for the extending meeting time and candid discussions of issues that you provided to us. The Organizations would like to summarize some of the facts that we discussed in our meeting, as these are foundational to our position on the Proposal. The Organizations support the principal that the permit system would be a vehicle used for the education of users and not as a method to restrict access to these routes. The specific facts we discussed would include:

1. Permits would remain free to the public;
2. Permits would be easily accessible to the public from a wide range of sources including via electronic access;
3. Permit limitations are estimated to be twice the average current visitation and would be revisited and expanded if limitations to access resulted from the permit program;
4. If permits are not available for a particular day, applicants should be provided information on other dates or locations when permits are available;
5. The daily visitation totals for the permit program will not include overnight campers, rental units or guided trips and that these users will not count against the daily permit total;
6. Educational efforts would target all users of area and not just members of the public entering under a permit;
7. Permits would not be required on several of the roads within the White Rim and Elephant Hill system; and
8. Group size must be increased for motorcycle users to insure buddy system is available in emergency situation and high quality social experiences are preserved.

These issues, and the related position of the NPS, are highly relevant to the position being taken in these comments. The Organizations further submit that any significant restrictions in the factors above would result in direct conflict with Canyonlands Foundational Documents that require exceptional recreational access for the public to the backcountry of Canyonlands.

1. An additional comment period would be highly beneficial after public is provided more information on the proposal.

The Organizations are concerned that there is very little information available to the public regarding the purpose and need of the Proposal, which will seriously limit meaningful public input and impair the opportunity to build public support for the Proposal in the comment period. The Organizations appreciate our meeting with your office, as this meeting provided a great deal of insight on issues sought to be resolved in the Proposal and that the intent of the Proposal is to develop a consistent contact point with the public to educate them regarding NPS management and opportunities. Unfortunately, much of this information is not available to the public and it does not appear that a fact sheet will be provided with sufficient time to allow the public to become aware of the information. The Organizations must be candid with their position, the meeting we had with your office heavily influenced our position on this issue and without this meeting we would have been forced to more vigorously oppose the Proposal. The Organizations would request that an additional comment period be provided after the additional information provided in our discussion is outlined for the public to comment on.

The Organizations have been involved in many efforts on public lands to address a wide range of recreational management issues that occur on these lands. This experience has provided us with the understanding that often the agencies office staff changes in these ongoing process or projects simply take longer to implement than expected. Sometimes a change in staff can have a dramatic impact on the direction of the project if the purpose and intent of the project is not well documented. As a result, documentation of the intent and purpose of any project can be highly valuable as the project move forward. The Organizations submit that additional public documentation could effectively fill this role while insuring that public understanding of the Proposal mirrors the direction and intent of the Proposal from the agency perspective. Good documentation of the project also avoids confusion in the direction of partnerships that could be formed in the resolution of issues in the project.

The Organizations believe that providing an additional comment period after further information is provided for the public to comment will pay an additional benefit to the NPS. The Organizations are aware that over the last several years there have been several attempts to develop a permit program for these areas, which we will refer to as Pilot Programs for purposes of these comments. The Pilot Programs have met with mixed success and what the NPS has learned as part of these pilot programs would probably be highly relevant to building public support and understanding for the current proposal. This information could be used to build support for the Proposal, but without an additional comment period, this opportunity will have been lost.

2a. The routes are critical in providing exceptional recreational access to the backcountry identified as a cornerstone principal of Canyonlands in its Foundation Document.

The Organizations are aware that the backcountry roads that are the basis of the permit proposal provide a rather unique recreational experience within the National Park Service system. The general management model of the NPS is large areas of lands that are subject to minimal development, which are managed under strict air, water and sound management standards, and these areas are crossed by corridors of exceptionally high levels of usage and access to the public. This model provides unique management challenges for the NPS and opportunities for the public on these lands as they are significantly different than public lands managed by other agencies and often conflict between management standards for areas that are immediately adjacent to each other.

The Organizations believe that a review of the foundational documents for the management of the Canyonlands NP area will be highly relevant to understanding the Organizations position on the Proposal and shed light on the possible basis of concern from the public regarding the Proposal. The Organizations are concerned that a large amount of the press coverage and documentation relative to the Proposal repeatedly identify the "need for solitude" as a management priority providing the basis for the Proposal. In our meeting, this issue was simply never raised as a management concern. The Organizations would be deeply concerned regarding any attempt to expand or improve solitude opportunities as part of the Proposal, as over 90% of Canyonlands is already managed for this activity. Further expansion of solitude would almost immediately conflict with the requirements in the foundational document that the public have exceptional access to backcountry recreational opportunities.

The Organizations submit that the mission statement provided for Canyonlands National Park in their Foundation Document is highly relevant to our position on the Proposal. The Foundational Document clearly states purpose of Canyonlands is something other than preservation of resources as the Foundational Document clearly states:

"The purpose of Canyonlands National Park is to preserve striking geologic landscapes and associated ecosystems in an area encompassing the confluence of the Green and Colorado rivers possessing superlative scenic, scientific, and cultural features for the **inspiration, benefit, and use of the public.**"¹

Given that usage by the public of the Canyonlands area is a factor specifically provided in the Foundational Document, restrictions on the access of the public due to a permit program issue

¹ See, Canyonlands Foundation Document at pg 1.

would be problematic to reconcile with inspiring use by the public. The Organizations are familiar with the traditional NPS model of large areas of undeveloped lands being crossed by basically narrow corridors of exceptionally high usage routes for public access. The Organizations submit that this traditional NPS model would be sufficient to provide for the inspiration, benefit and use of the public.

The Organizations are aware that the Canyonlands Foundational Document goes further than the traditional NPS mandate which simply identifies use by the public as a management objective. The Foundational Document specifically identifies that exceptional backcountry access for recreation is also a factor contributing to the significance of the Canyonlands area and as a result Canyonlands managers must balance two conflicting objectives in the management of the Park. The Canyonlands Foundational Document clearly address the existing road system and high levels of access to be provided as follows:

- An assemblage of roads, many associated with a history of mining and ranching activities, continue to provide visitors with **exceptional recreational opportunities to access the backcountry** of Canyonlands National Park.²

The Organizations submit that the identification of "exceptional recreational opportunities to access the backcountry" as a management priority for the Canyonlands NP must be properly balanced with the need to educate users with the implementation of the Proposal. This balanced approach to management is based on the Foundational Document identification of significant reasons for the Canyonlands Park, which in relevant part provides:

"Significance statements describe the distinctive nature of the park and inform management decisions, focusing efforts on preserving and protecting the most important resources and values of the park unit."³

The Organizations submit that significant alteration of the criteria identified in these comments would almost immediately bring the Proposal into conflict with the Foundational Document and impair the protection of factors that contribute to the significance of the Canyonlands Park. This type of programmatic conflict must be avoided.

While 90% of Canyonlands is already managed for solitude, the two routes that are the basis of the Proposal are already identified as highly valuable in providing the exceptional backcountry recreational opportunities to the public required in the Foundational Document and providing

² See, Canyonlands Foundation Document at pg 1.

³ See, Canyonlands Foundation Document at pg 1.

the inspiration and benefit to the public from the Park. The NPS description of the White Rim Road is as follows:

"The 100 mile White Rim Road loops around and below the island mesa top and provides expansive views of the surrounding area. Trips usually take two to three days by four-wheel drive vehicle or three to four days by mountain bike." ⁴

The NPS description of the Elephant Hill Road is as follows:

"One of the most technical four-wheel-drive roads in Utah, Elephant Hill presents drivers and mountain bikers with steep grades, loose rock, stair-step drops, tight turns and tricky backing. Once over the hill, equally challenging roads lead to various features as well as BLM lands to the south of the park. No water is available at the campsites, but vault toilets are provided at all camping areas except New Bates Wilson. Groups camping at New Bates Wilson must bring their own Toilet."⁵

The Organizations submit that the NPS has already identified the critical role that both the Elephant Hill and White Rim routes fill in providing exceptional access to backcountry recreational opportunities identified as a management priority in the Foundational Documents. The Organizations must note that the only management concern that is identified to be maintained as **exceptional** is the public access to backcountry recreational opportunities. Solitude and wilderness are to be protected in this management process but this level of protection is simply never identified as maintaining exceptional solitude or exceptional wilderness. The Organizations would be opposed to any impairment of this exceptional recreational access to the back county provided by the routes that are the basis of the permit proposal.

2b. Expansion of solitude opportunities as part of the Proposal would not be supported by the Organizations as this conflicts with Foundational Documents for Canyonlands.

The Organizations feel compelled to address the possible expansion of solitude opportunities as part of the Proposal, as much of the press coverage and documentation from the NPS regarding the Proposal raise this issue. While the solitude issue is raised in press and supporting documents, this issue never was addressed in our meeting despite the long and wide ranging candid discussion that was provided. As noted, the Organizations would be opposed to the Proposal if the intent was to improve and protect solitude on a larger scale in Canyonlands.

⁴ <http://www.nps.gov/cany/planyourvisit/whiterimroad.htm>

⁵ <http://www.nps.gov/cany/planyourvisit/needlesroads.htm>

The Organizations note that the first place that solitude and wilderness issues are raised in relation to the Proposal are in the purpose and need portions of the Canyonlands webpage. While only the purpose and need document is addressed in these comments, similar sentiments have been identified in various non-agency documents.⁶ It is the Organizations position that the purpose and need document is unnecessarily narrow and interpreted in a manner that fails to accurately reflect the full scope and purpose of the Canyonlands Foundational Document. Per the Proposal purpose and need webpage, solitude and wilderness issues are involved as follows:

"Almost 90% of Canyonlands National Park is managed as back-country, including a system of historic roads that provides visitors with unique recreational opportunities in a remote national park setting. In the parks Foundation Document (2013), Canyonlands is characterized as "primarily a back-country park with limited accessibility," and "remote wildness and solitude" were identified as two of the parks fundamental values. Preservation of these fundamental values is critical to achieving the parks purpose and maintaining the parks significance."⁷

As almost 90% of Canyonlands NP more than 337,000 acres is already managed for solitude and wilderness, the Organizations are opposed to any efforts in the Proposal that would expand this management, as such an expansion of restrictive management standards would be contrary to the Foundational Documents for the Park. These factors have already been more than adequately provided for in management.

The Organizations must also vigorously assert that while wilderness and solitude are identified as factors to be managed for in Canyonlands NP, at no point are these factors placed above any others in the Foundational Document. The Organizations would note that the **only factor** where heightened protection is provided for in the Foundational Document is the assemblage of roads, many associated with a history of mining and ranching activities, continue to provide visitors with exceptional recreational opportunities to access the backcountry of Canyonlands National Park. Again an application of the Proposal in a restrictive manner would not reflect the true prioritization of usages provided in the Foundational Document and be opposed by the Organizations.

⁶ See, Eric Trenbearth; *NPS proposes permit system for White Rim and Elephant Hill*; Moab Sun Times; March 26, 2015 available at http://www.moabsunnews.com/news/article_3110401c-d3cb-11e4-9477-878fc6fa1139.html

⁷ <http://parkplanning.nps.gov/projectHome.cfm?parkID=37&projectID=50620>

The Organizations also believe that a comparison of protection of solitude and wilderness being provided by current Canyonlands management to the Wilderness Act of 1964 and areas being managed under this act are highly relevant to the Organizations concerns on possible restrictive application of the Proposal. The Organizations are aware that NPS protection of wilderness and Congressionally protected Wilderness areas are technically different, the Organizations believe these comparisons remain highly relevant to our concerns. The Organizations believe that identification of the 5,000 acre standard in the Wilderness act as the minimum amount that which is necessary to provide solitude is highly relevant to the Organizations concerns regarding a restrictive application of the Proposal. Any position that the 304,161 acres currently managed in Canyonlands for wilderness and solitude was not providing these opportunities would be difficult to reconcile with the Wilderness Act conclusions that 5,000 acre areas are sufficient to provide high quality solitude and wilderness opportunities for these factors and users seeking this type of opportunity.

The Organizations also believe that comparison of the 304,161 acres currently managed for wilderness and solitude in the Canyonlands NP to Congressionally designated Wilderness areas is also highly relevant to our concerns. Protection of 304,161 acres would place Canyonlands NP at 58th in total acreages protected on list of 762 Wilderness areas that have been designated by Congress.⁸ The Organizations submit that the placement of Canyonlands NP in the top 7% of the list of Congressionally designated Wilderness areas provides a strong factual argument that these interests have been adequately protected in the Canyonlands management process. Again, the Organizations submit that such high levels of protection for wilderness and solitude already being in place weigh heavily against any more restrictions to public access that could result from an over restrictive implementation of a permit process.

2c. Permits must remain free.

The possibility of imposition of a fee at some point in the future in order to obtain a permit to use Elephant Hill or White Rim Trails would be opposed by the Organizations. It is the Organizations position that paying the entrance fee for the park should provide full access to opportunities in the park. The Organizations are aware that there are proposals to increase access fees to all the parks within the planning region. Some of these fee increases are significant. Given that fees are already proposed to be increased for entrance to the park, the Organizations submit this fee should be sufficient to cover any administrative overhead for the free permit program. While the Organizations are aware that federal funding for the operation of NPS facilities continues to decline, the Organizations vigorously assert that the resolution of this issue lies with the Congressional budgeting process and not with additional fees to users.

⁸ See, <http://www.wilderness.net/NWPS/advSearch>

The Organizations further submit that compliance with FLREA requirements of any fee based permit program for the access to the White Rim and Elephant Hill Trails would be difficult, if not impossible due to limitations on development in the Foundational Documents and minimum service levels required by FLREA. The Organizations further submit that even if FLREA compliance could be developed, administration of this program would be difficult and expensive and would result in a serious limitation on any funding streams that could be developed for management of these routes.

The Organizations are also aware that the imposition of any fee for permits would result in a serious limitation on development of volunteer partnerships for the management and maintenance of the routes that are the basis of the Proposal. The Organizations are aware that often volunteer support for the management of areas can be developed that far exceeds any monetary benefits from a pay to play modeled permit for a particular area. Once there is a fee in place, the public simply assumed the funding is sufficient to maintain the area is now available and that partnerships are no longer necessary. Often this is simply not the case and weighs heavily against imposition of a fee.

2d. Permits must be easy to get and available from a wide range of facilities

In our meeting, the relationship of the level of permits proposed to be available to visitation to the routes was a major point of discussion. Prior to the meeting, this relationship was a major concern for the Organizations. Based on our discussions you believe that the levels of permits available to users of these routes is approximately twice the levels of the public visitation to the areas. The Organizations believe this is an issue where visitation estimates from previous pilot programs would have been highly relevant to the Organizations ability to create meaningful comments on the current Proposal. The Organizations welcomed our discussion on the fact that the permits would not be used as a limitation on visitation and the Organizations believe that this position must be clearly stated in any guidance documents that are prepared relative to implementation of a permit program.

The Organizations further submit that a periodic review process to compare levels of public visitation to the permit routes and the levels of permits provided must be created in order to avoid future restrictions on access to the routes. Without mandatory periodic reviews of permit levels, access could be restricted simply due to NPS staff being directed towards other issues or projects and such a periodic review not being mandated in the permit proposal. The Organizations further submit that these periodic reviews should include representatives from all the user groups impacted by the permit process, including the public and permittees.

While the Organizations are not opposed to redistribution of users away from peak visitation days, the Organizations are opposed to a systemic reduction in the opportunity to utilize these

unique opportunities. Such a restriction on the routes in question would directly contradict one of the Foundational Documents management priorities for Canyonlands mainly "exceptional recreational opportunities to access the backcountry". The Organizations submit that clarification of the intent to avoid major limitations on access would allow the public to more fully understand the educational intent of the program. The more information that can be provided to support this position would build public support for the program over time.

3. Purely educational programs should be explored as an alternative to the permit proposal.

Throughout our discussion with your office, the need to institute the permit program in order to expand educational opportunities for those using these Canyonlands Park areas was repeatedly stated. The Organizations are intimately aware that educational efforts can be highly effective in protecting resources and providing recreational opportunities if they are properly targeted. The Organizations vigorously assert that most recreational users will follow the rules, if they know what the rules are. If they are not aware of rules, violations can be an issue. Given the significantly different standards for recreation on NPS lands in comparison to BLM and USFS lands, the Organizations believe this may be an issue on the usage of the routes that are the basis of the Proposal.

The Organizations believe a comparison of the basic levels of training that must be provided as part of a guided Whitewater rafting trip are highly relevant to our discussion and position. While the challenges are different between rafting and route usage in Canyonlands are different, the scope of education should be similar. Both these activities provide a physically demanding recreational experience in the backcountry. The Organizations understand that very minimal training is provided to those renting equipment for accessing the routes in Canyonlands as part of the rental experience. This lack of training is contrasted with rafting guide training as the public is provided swift water safety training and paddling guidance. This training is often tailored to the level of whitewater rafting that is being experienced, and the higher the class of rapids being traversed the more training is provided to the public.

After further thought on this issue, the Organizations would like to explore the possibility of a purely educational program as a possible alternative to the permit system. It has been the Organizations experience that even effective permit systems are expensive to operate and given the ever reducing federal funding for all public lands management, the Organizations believe the reduced overhead of a purely educational program should be explored as a more cost effective manner to educate users. This purely educational program would remove possible expansion of costs that would be incurred with implementation of the permit program and allow limited management resources to be more effectively applied for the benefit of the public. The Organizations are aware that even the most effective permit program can create significant overhead, which would place additional stress on limited agency funding and the

commitment that the permits remain free to the public to obtain. This situation would be avoided with a purely educational program.

4. No data from pilot programs is provided to support the Proposal.

The Organizations have reviewed the basic information on pilot program efforts which sought to provide a free permit program for Elephant Hill and White Rim trails in 2011. These efforts clearly have created some level of information regarding visitation to the routes and clearly there was a public response to the proposed group size limits and permit process generally in 2011. The Organizations believe that this information would be highly relevant to development of meaningful public input on the Proposal. The Organizations further assert that these pilot programs provided learning opportunities for the agencies and users, as the Organizations must believe there were unexpected issues that became hurdles to the pilot program. The Organizations believe a discussion of these hurdles to the pilot and how they were resolved would be highly relevant to public understanding and insuring that these hurdles were resolved in the development of a permit program in the future. This is simply information that can only be obtained from the NPS and remains highly relevant to discussions in the Proposal.

5a. Group sizes should be larger for motorcycle usage.

The Organizations submit that group sizes on each of the trail must be larger for those choosing to access these routes with a motorcycle as these are very remote areas and often cell phone service is not available on significant portions of the trail. While 3 vehicles may provide adequate safety for users in terms of full size motor vehicles, this basic safety is not present on motorcycles. Often individual motorcycle riders are limited in their ability to carry emergency response gear, and as a result each rider carries what they are able to safely transport and the total equipment is balanced across the group (ie: one rider carries food, another rider carries camping gear and a third carries tools to repair the bikes and emergency gear). The Organizations submit that small groups simply cannot insure that basic equipment would be available in an emergency situation if the group were forced to divide the group into smaller groups in order to deal with a situation. This type of planning is important to the motorcycle community given the length and remoteness of these routes and limited cell phone coverage in portions of the routes.

If there is an injury or other issue in a group of only three motorcycle riders, the 3 rider limitation would force one rider to abandon the "buddy system" or the principal of not riding alone, which is a cornerstone of safe motorcycle usage in the backcountry. The Organizations submit that the buddy system provides a significant safety benefit to all users. If there is a limitation of three motorcycles per group either the rider that is injured or staying with broken down equipment will be violating the buddy rule. If one rider stays with the injured rider or

two riders stay with the broken down equipment then the person traveling to obtain assistance will be violating the buddy system. Given the remote nature of these routes it could be several hours until help for an injured rider arrived on the accident scene or riders realized that the lone rider that left the group to obtain emergency assistance did not get to his destination. This lost time could be critical in the event of a serious injury. The Organizations submit that basic safety for users of motorcycles requires expansion of the permit levels to at least 6 riders per group makes more sense. Traditional full size users will simply never have to face this issue as each vehicle normally has more than two occupants and can simply transport far more supplies that could be used in an emergency situation.

The Organizations are also concerned regarding the impact that a 3 rider per group limitation would have on the quality of the social component of recreation for motorcycle users. The social interaction of rider is a large component of recreation on public lands. While a rider group of 3 does allow for some social interaction, a larger group simply improves this experience. The Organizations believe that the inferior social component of recreational usage to motorcycles from the permit proposal is evident when compared to the group size provided for other users groups. The average full size vehicle has 2.5 people per vehicle and as a result full size users can have a group of up to 7.5 people on average, and mountain bikers can have up to 15 riders. There can be no factual based argument made that similar quality of social experiences can be provided with such a disparate group size.

The Organizations are also concerned that there is a large disparity in the per group visitation limits for motorcycles (3) in comparison to bicycles (15). The Organizations are unable to find any information regarding the basis for these very different group size restrictions, which seriously complicates our ability to meaningfully comment on this issue. It is the Organizations position that many of the management issues faced on the routes, such as safety in passing other users, would result in group levels for motorcycles being more closely related to bicycle group size than a full size motor vehicle. The Organizations would note that the 15 person bicycle limitation avoids any issues with the buddy system being violated if there is an injury.

5b. The NPS experiences with managing snowmobiles in Yellowstone supports larger user group size for motorcycle users in Canyonlands.

The Organizations believe that experiences of the NPS regarding the management of snowmobiles in Yellowstone National Park is highly relevant to the Organizations concerns on the small group size for motorcycles. Yellowstone NP has established a maximum group size of 5 snowmobiles per group.⁹ The NPS has also started managing what they refer to as "sound

⁹ See, DEPARTMENT OF THE INTERIOR, National Park Service; Special Regulations; *Areas of the National Park System; Yellowstone National Park; Winter Use*; Federal Register / Vol. 78, No. 73 / Tuesday, April 16, 2013 / Proposed Rules at pg 22470.

events" in Yellowstone NP for winter users as they have found that impacts of sound are often not related to the number of vehicles passing another group or a particular volume level but more related to interference with other user groups is achieving goals sought in their recreational endeavors. The Organizations are aware that Yellowstone has several years of research to support their conclusions, and this information is not discussed in more detail in the hope of providing directly relevant comments. The Organizations would be more than willing to discuss this research with your office if that discussion was desired.

This information is highly relevant to Canyonlands NP as Yellowstone NP is managed under similar broad NPS guidelines for Park management including air and resource protection and larger groups are permitted in Yellowstone even without the Canyonlands Foundational Document requirement that exceptional recreational opportunities to access the backcountry are provided to the public.

6. Conclusion.

The Organizations are not opposed to the education of users regarding the proper usage of NPS lands, but the Organizations are aware that the scope of educational efforts must be correct. The Organizations are not able to support the Proposal in its current form due the void in supporting documentation around the Proposal to insure the proper scope and targeting of the Proposal. There is simply too much information that has been provided in an informal manner and it has been the Organizations experience that such information is too often misunderstood or lost in translation or with passage of time. The Organizations support ongoing efforts to develop effective management of this area and educate users, but do not believe the Proposal is in a position that can be supported at this time, as it simply needs more development and clarification.

The Organizations submit that a more comprehensive review of all recreational visitation to the White Rim and Elephant Hill areas needs to be undertaken to address all phases of recreational management of these areas. This comprehensive review would include analysis and balancing of guide service visitation, rental operations and tours and overall levels of all types of publicly available recreation in the area. The Organizations submit that education of users accessing the area via permittees or guides is an important issue in resolving management of the area that simply cannot be overlooked and the Organizations are not aware of the scope of education and monitoring that would occur outside the public permit system proposed.

The Organizations support the principal that the permit system would be a vehicle used for the education of users and not as a method to restrict access to these routes. The specific facts on the permit system we believe to be foundational would include:

1. Permits would remain free to the public;
2. Permits would be easily accessible to the public from a wide range of sources including via electronic access;
3. Permit limitations are estimated to be twice the average current visitation and would be revisited and expanded if limitations to access resulted from the permit program;
4. If permits are not available for a particular day, applicants should be provided information on other dates or locations when permits are available;
5. The daily visitation totals for the permit program will not include overnight campers, rental units or guided trips and that these users will not count against the daily permit total;
6. Educational efforts would target all users of area and not just members of the public entering under a permit;
7. Permits would not be required on several of the roads within the White Rim and Elephant Hill system; and
8. Group size must be increased for motorcycle users to insure buddy system is available in emergency situation and high quality social experiences are preserved.

These issues, and the related position of the NPS, are highly relevant to the position being taken in these comments. The Organizations further submit that any significant restrictions in the factors above would result in direct conflict with Canyonlands Foundational Documents that require exceptional recreational access for the public to the backcountry of Canyonlands.

If you have questions please feel free to contact: Scott Jones, Esq., 508 Ashford Drive, Longmont CO 80504. His phone is (518)281-5810 and email is scott.jones46@yahoo.com.

Sincerely,



Scott Jones, Esq.
COHVCO Authorized Representative

D.E. Riggle
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Trails Preservation Alliance

cc: Kate Cannon