

From: [Paul Stevens](#)
To: [Mike Murray](#)
Cc: [Jon Anglin](#)
Subject: Re: please review proposed rule and FEIS language
Date: 07/16/2010 11:35 AM

I agree simpler is better. Not sure I agree with two axle limit for trailers. This could be a loop hole for someone wanting to tow a travel trailer onto the beach. I think two axle limit for vehicles and one axle limit for trailers. What do you think?

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▼ [Mike Murray/CAHA/NPS](#)

**Mike
Murray/CAHA/NPS**

To Paul Stevens/CAHA/NPS@NPS
cc Jon Anglin/CAHA/NPS@NPS
07/15/2010 10:05 AM Subject please review proposed rule and FEIS language

Paul,

The proposed rule and draft FEIS currently indicates the following for vehicle, trailer, and combined length criteria:

- **The vehicle must have no more than two axles (does not include the additional number of axles on towed trailers).**
- **Towed trailers must have no more than two axles.**
- **The maximum combined length of a vehicle and trailer that may operate off-road is 30 feet.**

This language evolved from what the DEIS stated, which was:

- There is a three axle maximum for vehicles (this is the axle maximum for the powered vehicle only and does not include the additional number of axles on towed trailers).
- Any trailers are limited to no more than two axles.
- The maximum vehicle length is thirty (30') feet (this is the maximum length for the powered vehicle and does not include the additional length of a towed trailer).

Note: We revised the language for the FEIS and proposed rule because a 30-ft long vehicle seems inappropriate. A Chevy Suburban is 222 inches (18.5 ft) long, so what kind of vehicle could possibly be 30 ft long?

I can live with the two-axle limit for both vehicles and trailers; however, the 30 ft. combined length seems too short. For example, if an 18.5 ft long Suburban were pulling a small boat trailer (presumably the trailer is longer than the boat), the trailer could be no more than 11.5 ft long, which doesn't seem reasonable.

Please review the proposed rule/FEIS language in BOLD at the top of this message and revise it to be sure the axle and/or length limitations are reasonable and accomplish what we want (i.e., to limit the use to reasonably-sized ORVs and towing/launching of reasonably-sized "small" boats).

Ideas for consideration to fix the language:

- 1) Eliminate the combined vehicle length and rely upon the 2-axle limit for both vehicle and trailer as the sole criteria for limiting the size of vehicles use); or
- 2) Have a vehicle length of 20 ft (instead of 30 ft; 20 ft would allow something larger than a suburban, but not allow semi-tractors or other oversized vehicles); or
- 3) Have a combined (vehicle+trailer) length of 40 ft (which would allow a vehicle almost 20 ft long to pull a trailer almost 20 ft long);
- 4) Other ideas?

If we go with "simpler is better", idea # 1 one may be the best. Your thoughts?

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