

From: [Mike Murray](#)
To: [DOI/SOL Jason Waanders](#); [DOI/SER Mike Stevens Ext 238](#); [NPS Doug Wetmore](#); [Bruce Peacock](#); [RTI Carol](#)
Subject: Fw: Cape Hatteras ORV -- No IRFA necessary, but you must thoroughly address SBA concerns
Date: 06/08/2011 03:40 PM

See below FYI. Can discuss during call on Thursday.

Sent from my BlackBerry Wireless Handheld
▼ [Russ Wilson](#)

----- Original Message -----

From: Russ Wilson
Sent: 06/08/2011 05:13 PM EDT
To: Mike Murray
Subject: Fw: Cape Hatteras ORV -- No IRFA necessary, but you must thoroughly address SBA concerns

Russel J. Wilson
Chief, Regulations and Special Park Uses

National Park Service
Washington Office
1849 C Street, NW, MS-3122
Washington, DC 20240

202 208-4206 phone
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----- Forwarded by Russ Wilson/WASO/NPS on 06/08/2011 05:12 PM -----

"Strylowski, John A"
<John_Strylowski@ios.doi.gov>

06/08/2011 04:07 PM

To "Wilson, Russel J." <Russ_Wilson@nps.gov>
cc "North, Arthur" <AJ_North@nps.gov>
Subject Cape Hatteras ORV -- No IRFA necessary, but you must thoroughly address SBA concerns

I talked with Nathan Frey on this issue and he said he agrees that an initial regulatory flexibility analysis isn't necessary, but you must be sure to thoroughly address small business concerns. Specifically, you must –

- Say that while the regulation doesn't meet the Regulatory Flexibility Act threshold for an initial regulatory flexibility analysis, you recognize that 100 percent of the economic effects will be on small businesses.
- Carefully address the small business concerns and request comments on the specific solutions that you propose.

You have to do a good job to forestall SBA pushing on this issue. I think this is a reasonable compromise and appreciate Nathan's flexibility.

0030834

It would be good to get this it Nathan by tomorrow or Friday if possible so that he sees we're doing our part to move this along.

Please let me know if you have questions about what to do.

John

John A. Strylowski | Senior Regulatory Analyst | US Department of the Interior

Direct: 202-208-3071 | Main: 202-208-3181 | Fax: 202-219-2100

From: Strylowski, John A

Sent: Wednesday, June 08, 2011 3:46 PM

To: Wilson, Russel J.

Cc: 'AJ_North@nps.gov'

Subject: I disagree with the SBA comments

I think that doing an IRFA is not reasonable. I would urge you to carefully address small business concerns in the preamble, but I can't see doing an IRFA with the deadline we have looming. What do you think? I haven't yet raised this with Fay Iudicello, but I will if you want me to.

John A. Strylowski | Senior Regulatory Analyst | US Department of the Interior

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From: Strylowski, John A

Sent: Tuesday, June 07, 2011 2:14 PM

To: Wilson, Russel J.

Cc: 'AJ_North@nps.gov'

Subject: FW: SBA Comments: DOI/NPS Proposed Rule -- Cape Hatteras National Seashore--Off-Road Vehicle Management

Russ –

Here are the SBA comments, for which Nathan Frey needs a written response. Please let me know if you need anything.

Also, any luck reaching David Jacob?

John

0030835

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From: Frey, Nathan J. [mailto:Nathan_J._Frey@omb.eop.gov]
Sent: Tuesday, June 07, 2011 1:07 PM
To: Strylowski, John A
Subject: SBA Comments: DOI/NPS Proposed Rule -- Cape Hatteras
National Seashore--Off-Road Vehicle Management

Attached are Advocacy's interagency comments to the NPS's Off Shore Vehicle Rule. Please instruct NPS to provide a written response to these comments to facilitate any needed follow up. Thanks and please let me know if you have any questions.

[attachment "Cape HatterasOff Road Vehicle Rule Interagency Memorandum.docx" deleted by Doug Wetmore/DENVER/NPS]