

COMMENTS ON NEGOTIATED RULE MAKING

As an alternate to this committee, I sat through 12 of these meetings, and it was clear to me that there were three groups, that were not going to work to reach consensus, when they did not play by the rules from the start.

Therefore the access group tried to put forth an optional plan that took into account the following things from the MANAGEMENT POLICIES (the guide to managing the national park system dated Aug 31, 2006) Those are listed below.

1: Park Purposes and Legislatively Authorized Uses (1.4.3.1 pg. 11)

In determining whether or how to allow the use, park managers must consider the congressional or presidential interest as expressed in the enabling Legislation or proclamation, that the use or uses continue.

2: Ethnographic Resources (5.3.5.3 pg. 108)

These people are contemporary park neighbors and ethnic or occupational communities that have been associated with a park for two or more generations and whose interests in the park's resources began before the park's establishment.

3: Appropriate Use (8.1.1 pg. 154) This section refers back to Park Purposes.

Also in this section see (8.11.2 pg. 194&195) NPS-SUPPORTED STUDIES NPS - supported research will rely on high-quality methods and under go peer review. NFS-supported scientists will be expected to publish their findings in refereed journals, among other outlets.

These studies and reports were asked for at the first meeting and would have been of help, in coming up with the O.R.V. plan. I as a member of the access committee think that the alternate plan X will meet all the requirements of the executive order, the management policies, and the E.S.A.

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Membership 65000 +or-