

## CAC RECOMMENDATIONS

As you are aware the Park has issued its scoping notice on its Beach Vehicle Environmental Assessment (EA), which can be found at <http://parkplanning.nps.gov/projectHome.cfm?parkID=86&projectId=32158>.

The Park's scoping notice is requesting comments on the speed limit alternatives proposed in such EA.

CAC recommends that if you desire that your comments on the EA be considered, that your comments be set forth in a professional and courteous manner and that at a minimum you offer comments on the speed limit alternative you feel should be implemented on the Park's beach. In proposing a speed limit alternative, you can propose an alternative not listed in the scoping notice on the EA. In fact, that is what CAC will be doing. CAC is disappointed that the Park elected to omit from its scoping notice the alternative which CAC has been advocating, which is a year-round 25 mph speed limit south of MM 2.5, with safety zones for protection of Park visitors, volunteers and staff. In fact, it was CAC which first suggested last year that the Park consider the implementation of safety zones on the beach.

If the Park had desired to prepare an Environmental Impact Study (EIS) on its turtle program, it could have undertaken one without issuing its scoping notice on the EA. Obviously, the Park does not desire to go to the expense of an EIS and will be arguing that one is not necessary.

If you object to the Park's Alternatives 2, 3 or 4, CAC believes that it is more likely that the compiler of the EA will consider your comments if you offer the speed limit alternative that you prefer, rather than not mentioning your preferred speed limit alternative, and only proposing that the Park be required to do an EIS.

If you desire to propose in your comments both a speed limit alternative and that the Park should be required to undertake an EIS on its turtle program, that is appropriate and is what CAC will be doing.

CAC will probably be publishing and filing its comments to the EA during the 3<sup>rd</sup> week in August, 2010. In its comments, after considerable analysis and discussion of various matters, CAC will be recommending

1. that an EIS should be required by the Park on its Kemp's ridley sea turtle program addressing the issues raised by CAC in its comments, including, the number of such turtles which can be taken at the Park, the impact of access restrictions on Park users, and all other relevant issues, and
2. that the speed limit on the Park's beach from MM 2.5 south to Mansfield Channel be 25 mph year-round, except that the speed limit be 15 mph

within 100 feet of a person not in a vehicle, a pet, a parked vehicle or a structure (the Preferred Alternative”).

CAC in its comments will be discussing in detail why the Park’s safety zone is too broad and why CAC’s proposed safety zone is better than the Park’s proposed 15 mph safety zone within 100 yards of people, pets, vehicles, structures, flocks of birds and other wildlife.

CAC does not believe that Alternative 2 proposed by the Park is needed or justified, and believes that the Preferred Alternative better protects Park visitors, volunteers and staff than do the Park’s Alternatives 3 and 4, without significantly and unnecessarily impairing visitors’ access rights, denying visitors the opportunity to enjoy park resources and values or significantly impacting the human environment, as do the Park’s Alternatives.

CAC urges you to file your own comments, and, of course, suggests that in preparing your comments that you consider the recommendations discussed above that CAC will be making to the compiler of the EA.

In preparing your comments, be sure to address it to the Superintendent as provided in the EA notice, then include your comments, and finally include your name, address, phone number and e-mail address. Your comments can be submitted on line, by e-mail or by mail, as provided in the notice. Faxed comments will not be accepted.

Obviously, the more Park visitors who submit comments advocating that the speed limit on the Park’s beach from MM 2.5 south to Mansfield Channel be 25 mph year-round, except that the speed limit be 15 mph within 100 feet of a person not in a vehicle, a pet, a parked vehicle or a structure, the better.