



August 2, 2019

Bureau of Land Management
2019 Price Field Office
125 South 600 West
Price, Utah 84501

**San Rafael Desert (SRD) Travel Management Area (TMA)
Comments**

Dear BLM Planning Team:

Please accept these comments regarding the San Rafael Desert (SRD) Travel Management Area (TMA) on behalf of the Trails Preservation Alliance ("TPA") and the Colorado Off-Highway Vehicle Coalition ("COHVCO"). The TPA is a volunteer organization created to be a viable partner assisting public lands managers, 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 for the sport and works to help ensure that the USFS allocates a fair and equitable percentage of public lands access to diverse trail riding opportunities. COHVCO is a grassroots advocacy organization representing approximately 170,000 registered off-highway vehicle ("OHV"), snowmobile and 4WD users throughout Colorado and is a member supported 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 and COHVCO are referred to collectively in this correspondence as "The organizations." Many of our organization's affiliates and members routinely travel to and recreate in Utah and specifically in the San Rafael Desert.

The organizations share solidarity with our Utah partner, Ride with Respect (RwR), we support and endorse their comments for the SRD TMA. As background for our comments, since 55,000 acres of that planning area were recently designated as wilderness, and this wilderness designation now permanently closes over 80 miles of motorized routes, it puts an even greater onus on the remainder of the planning area to provide suitable and worthwhile opportunities for motorized recreation.

The organizations generally support Alternative D with specific modifications and additions. We support Alternative D as it represents the most balanced solution and best supports the recreational interests of our organizations and preserves public access. The organizations hereby offer that Alternative D will be improved and provide enhanced value with the following specific modifications to the SRD TMA:

- The road up Dry Lake Wash (SD 810) should remain open to the general public and not become restricted to administrative use. The Dry Lake Wash road has special recreational value by following a non-riparian wash bottom that follows the wash all the way to its upper end. Allowing public access and use along the length of Dry Lake Wash is the only way for the nearby motorized singletrack (SD 812) to continue being a continuous route. Allowing public use will maintain the connective value of each route, and is likely to simplify compliance for the BLM.
- The road that travels from the San Rafael Valley to Acerson Mine (SD 984) needs to remain open to public access and not converted to administrative use only.
- The spur road (and Class D) further north of Three Canyon (SD 681a) should be left open for another 0.2 miles to reach the overlook of Bull Bottom. This particular overlook has high scenic qualities and provides multiple dispersed camping sites.
- The spur road (and Class D) that reaches the head of Keg Spring Canyon (SD 494) should remain open to the public and provide access for another 0.3 miles in order to reach a School and Institutional Trust Lands Administration (SITLA) section, where the spur extends for another mile to a terminus on SITLA property. The spur has recreational value by reaching a flat slick rock area, a shallow alcove, and provides hiking access to nearby Keg Spring Canyon
- The spur (and Class D) road immediately north of Three Canyon (SD 679a) should remain open for another 0.1 miles to reach the overlook of Trin-Alcove Bend. The overlook has high scenic qualities and provides multiple campsites. This route/area is suitable for recreation due in part to the slick rock surface and natural barrier of the cliffs surrounding its terminus.

We thank you for reviewing and considering these comments and suggestions.

Sincerely,



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