

November 15th, 2020

Bureau of Land Management  
Moab Field Office  
82 East Dogwood Avenue  
Moab, UT 84532

Dear BLM Planning Team:

We appreciate the opportunity to comment on your draft Environmental Assessment of the Canyon Rims Travel Management Area (TMA). Of the four alternatives in the Canyon Rims draft EA, we believe that alternatives A and D are the only acceptable options for providing a modest quantity and quality of off-highway vehicle (OHV) recreation opportunities, which is key to ensuring compliance and sustainable management of the area.

Moab Friends-For-Wheelin' (MFFW) is a non-profit club founded in 2005 to bring four-wheel drive enthusiasts together and promote the pastime of four-wheeling to the community as well as other enthusiasts. MFFW has worked closely with the Moab offices of the BLM, SITLA, USFS, local land owners, and the community to promote responsible four-wheel drive recreation in the Moab area. MFFW has volunteered thousands of hours and thousands of dollars to various projects such as trail maintenance and restoration, community service, and effective communication with other four-wheel drive organizations as well as public land managers.

The Colorado Trails Preservation Alliance (TPA) is an advocacy organization created to be a viable partner to public lands managers, working with the USFS and BLM to preserve the sport of motorized trail riding and multiple-use recreation. The TPA acts as an advocate for the sport and takes the necessary action to ensure that the USFS and BLM allocate a fair and equitable percentage of public lands access to diverse multiple-use trail recreational opportunities. The TPA actively supports Ride with Respect's efforts in the greater Moab area and have partnered on our comments concerning the Canyon Rims draft EA.

Ride with Respect (RwR) was founded in 2002 to conserve shared-use trails and their surroundings. Since then, over 750 individuals have contributed money or volunteered time to the organization. RwR has performed 20,000 hours of high-quality trail work on public lands, most of which has been in the Moab Field Office. RwR participated greatly in the Moab Resource Management Plan revision from 2003 through 2008. RwR also provided consultation to the TPA and other OHV signatories of the 2017 settlement agreement.

The 2017 settlement agreement states that the existing Travel Management Plans (TMPs) will remain in effect until the BLM issues new TMPs for the eleven TMAs. However it does not state that the existing TMPs will

become the baseline for analysis of the new TMPs. Since the 2017 settlement agreement essentially directs the BLM to revisit eleven parts of the 2008 TMPs, the appropriate baseline would be the one that was used to develop the 2008 TMPs in the first place, which is the No Action Alternative of the 2008 FEIS. In other words, to revisit the eleven parts of the 2008 TMPs, we must consider the motorized-travel policies that existed prior to the 2008 RODs.

In the case of the Moab Field Office, the 2008 RMP limited motorized travel to designated routes in the Canyon Rims TMA for the first time. Prior to the 2008 RMP, roughly half of the Canyon Rims TMA was open to cross-country travel, while the other half was limited to existing roads and trails. Limiting travel to a few-hundred miles of routes thereby limited the footprint of impact to less than 1% of the Canyon Rims TMA.

The Canyon Rims draft EA defines its baseline as the 272.5 miles of routes designated open by the 2008 RMP. These designated routes excluded 21.7 miles of Class D roads. Unlike other counties, San Juan County claimed only the subset of roads that it recommends to be available for motorized travel by the public. Many other roads exist. In fact, a quick review of satellite images clearly indicates that the Canyon Rims TMA has several times more existing roads than what is currently designated open by the 2008 RMP. Further, San Juan County didn't attempt to inventory non-road routes including wash bottoms, slickrock routes, and narrower trails for ATV or motorcycle use. In relying on San Juan County's recommended transportation system, the 2008 RMP didn't consider hundreds of miles of routes that existed in the Canyon Rims TMA.

Although Alternative D may exclude only 26 miles of routes that are currently designated open, it excludes over ten times that amount of routes which were historically used by motor vehicle in the Canyon Rims TMA. Although nearly all of the 26 miles were not found on the ground by the BLM, it does not necessarily mean that:

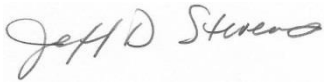
1. the routes have received no OHV use in recent years (as some terrain is prone to disguising evidence of use),
2. the routes have no current value for OHV use (as a lack of use could be due to a lack of wayfinding signs),
3. the routes have no potential value for OHV use (as the amount and types of recreational use increases), or
4. use of the routes would cause significant adverse impacts (as some routes are essentially innocuous).

In addition to the many routes excluded from the baseline of the Canyon Rims draft EA, Alternative C excludes 42 miles of routes that are currently designated open. Some of these 42 miles are routes that provide unique viewpoints, connectivity for looping opportunities off of graded roads, and portions of the San Juan OHV Trail System. These routes simply lack the negative impacts upon natural or social resources to warrant blocking them off, straining the BLM's relations with members of the public, and increasing traffic on the remaining routes.

In the Canyon Rims TMA, the existing TMP is already restrictive, and Alternative A would meet the BLM's legal obligations including the 2017 settlement agreement. Nevertheless we would accept Alternative D since Section 3.1.3 states that "The construction of new routes is not in the scope of this project; however, the addition of new routes is part of the operation and management of the overall travel network." After all, the spirit of the 2017 settlement agreement was to provide a path forward rather than to mire the BLM in excessive analysis.

Considering the context of all existing routes in the Canyon Rims TMA, and the restrictions already made there in 2008, we urge the BLM to minimize additional route closures by choosing alternatives A or D. Thanks for your consideration.

Sincerely,



Jeff Stevens  
President  
Moab Friends-For-Wheelin'



Chad Hixon  
Executive Director  
Trails Preservation Alliance



Clif Koontz  
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Ride with Respect