



July 23rd, 2021

Bureau of Land Management  
Vernal Field Office  
170 South 500 East  
Vernal, UT 84078

Dear BLM Planning Team:

We appreciate the opportunity to comment on your draft Environmental Assessment of the Book Cliffs Travel Management Area (TMA). COHVCO and TPA are signatories to the subject 2017 settlement agreement, and RWR provided consultation to the OHV signatories. We encourage you to work with us in addition to local entities such as Uintah Riders All Terrain (URAT), Uintah County, and the state's OHV Program that has expanded its Fiscal Incentive Grant program for all OHV trail work in addition to its own trail-work crews.

Our members access the Book Cliffs TMA from Vernal, from Moab or Green River via the road up Hay Canyon, from Grand Junction via the motorized singletrack toward Baxter Pass, and from Ranglely via the Wagon Wheel OHV trails. These singletrack and doubletrack trail systems should be connected for day loops as well as overnight trips that connect the towns, which would support local tourism economies.

The Book Cliffs TMA is suitable for a high concentration of OHV routes because most of it is an oil-and-gas field. Routes utilized by the Outlaw ATV Jamboree form a great foundation, but additional routes are needed to provide diverse recreational opportunities. In particular the more primitive routes provide quality OHV riding, and these routes may appear to be partially "reclaimed" or hard to find, particularly if they have been closed since 2008. This appearance doesn't justify closure since it doesn't 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).

Most of the routes closed in 2008 simply weren't inventoried, thus they weren't given due consideration, which is why it's key to start this Travel Management Plan (TMP) process with a more thorough inventory to make a more informed decision. Even if the TMP were to designate all of the existing routes open, it would still occupy less than 1% of the acreage, which is important context since the area was open to cross-country travel until the 2008 decision that lead to the 2017 settlement agreement.

A more thorough inventory of resources might also identify more potential conflicts. We ask that you consider the full array of options to mitigate those conflicts. Route closure is often not needed or even the most effective solution. Alternatives include educating visitors how and why to practice minimum-impact guidelines, trail work (e.g. marking the trail / blocking off the sides / stabilizing the tread in order to prevent erosion and discourage bypassing), and rerouting the trail to avoid sensitive sites altogether. The environmental assessment should identify these solutions and set a course to pursue them rather than unnecessarily closing a route even temporarily. Route closures tend to have their own costs in terms of public relations, noncompliance, and the displacement of negative impacts. They should be done only as a last resort after fully pursuing less-restrictive measures.

Sincerely,



Scott Jones  
Vice President  
Colorado OHV Coalition



Chad Hixon  
Executive Director  
Trails Preservation Alliance



Clif Koontz  
Executive Director  
Ride with Respect