

November 11th, 2021

Grand County Commission  
125 East Center Street  
Moab, Utah 84532

Dear Commissioners:

Thank you for initiating the development of comprehensive public-lands legislation across Grand County. The Motorized Trails Committee (MTC) sees the potential for such a bill to provide direction so that land managers and their partners can focus on managing activities rather than debating them. It would require providing a degree of security to each stakeholder.

Just as wilderness designation guarantees preservation, a bill could secure access for motorized recreation while providing sufficient flexibility for management. Over half of the roads and trails in Grand County have been closed<sup>1</sup> and, while most of the remaining routes are sustainable with basic maintenance and education, some routes warrant realignment or relocation. To this end, the MTC recommends establishing "no net loss" of motorized access just as Grand County did in its 2015 recommendations for the Public Lands Initiative (PLI):

"“No net loss” policy for roads in Grand County consistent with the 2008 Travel Management Plan; that losses and gains are kind for kind trade outs; and will utilize the BLM’s process for Travel Plan evaluation.”

In fact, since those recommendations were the culmination of thousands of hours of work, the MTC believes they should be the starting point for developing another bill. Granted the PLI didn't pass, but the primary disagreements were about San Juan County. Also the PLI bill that fell short was based on the recommendations of Grand County from 2014 more so than the ones from 2015. Why not pick up where we left off?

Recreation use levels have increased since 2015, but the increase could be used to justify changing access in either direction, and the fundamental issues of management remain the same. Resolving use conflicts along with resource conflicts may call for further restrictions in isolated cases, but please consider the suggestions in Ride with Respect's October 19th letter regarding the Labyrinth Rims Travel Management Plan, which we support. Additionally, the best way to help non-motorized recreation opportunities is often to improve the condition of non-motorized trails or build more of them.

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<sup>1</sup> BLM lands in the Grand County-portion of the Moab Field Office contain over 4,000 miles of Class D roads, of which 1,700 miles are open in the BLM's current travel plan (in addition to 1,000 miles of Class B roads). BLM lands in the Grand County-portion of the Moab Field Office contain approximately 600 miles of non-road routes (i.e. motorized singletrack, ATV trail, and sand washes that were driven prior to 2008), 300 miles of which Ride with Respect inventoried by 2007, and 150 miles of which are open in the BLM's current travel plan.

Likewise the Moab Ranger District allows motorized use of less than half the roads that were open to driving prior to 1991. The Moab Ranger District allows motorized use of zero of the 50 miles of singletrack trail that were open to motorcycling (and maintained by motorcyclists with USFS support) prior to 1991.

While expanding Arches National Park by roughly 20,000 acres would not benefit motorized recreation, the MTC is open to this idea provided that the boundaries are adjusted to leave the following 4WD roads out of the expanded park (from east to west):

1. Cache Valley Overlook (spur of the Dome Plateau Easter Jeep Safari route),
  2. Jug Rock (Class B graded road),
  3. Salt Wash Overlook (Winter Camp Ridge),
  4. Cordova Canyon Overlook (pipeline road),
  5. Eagles Nest (3 miles east of Valley City Reservoir), and
  6. Klondike Bluffs down to Salt Valley, then northwest to the 4WD road that climbs back up Copper Ridge.
- Note that we are not asking to avoid the 4WD routes on Dry Mesa because reaching them already requires entering Arches, so we expect that the NPS would continually allow use of the 4WD routes on Dry Mesa in the same way it currently allows use of Eye Of The Whale Road. Also note that acres lost by leaving these 6 roads out of a park expansion could be offset by adding acres northeast of Devils Garden.

Particularly considering the conservation-orientation of National Conservation Areas (NCAs), it seems excessive to apply this designation to nearly all USFS and BLM lands in Grand County other than a roughly ten-mile wide corridor following Interstate 70. The MTC agrees with your goal of increasing funds to manage recreation, but NCA designation doesn't automatically increase the BLM's budget whatsoever. NCA acreage can be used to argue for Congress to increase funding, but so can the acreage of other designations. While NCAs are part of the National Landscape Conservation System (NLCS or National Conservation Lands), and the BLM chooses to fund NLCS acres more so than non-NLCS acres, they don't raise the BLM's overall budget (particularly since mineral withdrawal is a part of NCA designation, and can be a part of almost any other type of designation). Granted, counties could compete for the NLCS funding bump by designating as much NCA acreage as possible, but it would only be at the expense of other funding areas. The bottom line is that NLCS expansion itself doesn't generate more funds for public lands in a lasting fashion.

Fortunately other fundraising potential exists. In addition to supporting BLM budgets for recreation nationwide, Grand County should consider state, local, and user-fee sources. Recreational Trails Program (RTP) and Utah Outdoor Recreation Grants (UORGs) are available for motorized and non-motorized recreation. The state's OHV grants offer several-million dollars each year for motorized trails. The state's own OHV trail crew is growing, and they recently trained with a mini-excavator around Moab in addition to the work they've done with hand tools.

In terms of local funding, the MTC appreciates the county's contribution to education and law enforcement on public lands, and we hope you'll expand it to keep pace with recreational use. We also encourage you to start contributing to the maintenance of motorized trails considering that they yield millions of tax dollars to Grand County and Moab City each year. We think this work should be eligible for the "promotional" half of TRT funds. Enhancing the recreational opportunities themselves is the best way to promote tourism, and it's the best way to promote other forms of local industry since our community's competitive advantage rests primarily upon recreational infrastructure to utilize public lands in a

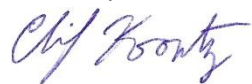
sustainable manner. If you aren't confident that trail work qualifies as promoting tourism or economic diversification, then ask the state legislature for reassurance, as trail work also benefits the businesses that collect TRT.

The MTC generally supports user fees so long as they are (a) affordable for the general public, (b) spent in the area they're collected, and (c) spent on things that actually benefit the user's recreational activity. Consider types of designations, their boundaries, and management guidelines that would lend themselves to reasonable user fees. Such an arrangement could also facilitate educational requirements like watching a brief video and answering a few questions along with paying a fee to recreate in the area.

Most of the acres in your NCA proposal are more suitable for designation as National Recreation Areas (NRAs) or other recreation areas like the one designated in the San Rafael Swell. However we oppose the Swell's prohibition on constructing motorized routes because the approval to construct motorized routes on federal lands is already increasingly rare and, when those circumstances arise, land managers should retain the option of doing so. The reality is that even "recreation" designations tend to yield further restrictions since they move BLM and USFS lands further away from their multiple-use missions. Provisions like a ban on route construction can render a designation to become recreation-area-in-name only. In the absence of such provisions, though, we appreciate including the word "recreation" in a designation to ensure that it continues to be accommodated and actively managed.

That said, an NCA may be the most suitable designation for the area between Castle Valley and Onion Creek. As with the idea of expanding Arches, we strive to be cooperative with other community interests. We simply ask that public-lands legislation offer lasting benefits to all forms of recreation. A process that includes the whole local community, state legislature, and Utah delegation could ensure a true resolution that's universal.

Sincerely,



Clif Koontz

Motorized Trails Committee Chair



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October 19th, 2021

Mary McGann, Chair  
Grand County Commission  
125 East Center Street  
Moab, Utah 84532

Dear Mary:

I am very concerned about the commission's draft letter to the BLM regarding the Travel Management Plan (TMP) revision for the Labyrinth Canyon area. My concerns include the commission's apparent dismissal of input from the Motorized Trails Committee (MTC), which I currently chair, but I am only representing Ride with Respect (RwR) in this letter.

All four of the BLM's preliminary alternatives designate fewer miles open to motorized travel than what the 2008 TMP provided. None of them propose to open a single mile of route that's not already open today. Therefore this set of preliminary alternatives uniquely affects motorized recreationists, so I am disappointed that the commission declined the MTC's request work through any concerns, instead jumping to the conclusion that none of the preliminary alternatives close enough routes.

The 2008 TMP closed half of the existing routes, many of which weren't even analyzed by the BLM (see RwR's attached scoping comments from April 26th). Since then, RwR has dutifully spent several-thousand hours contributing high-quality work in Labyrinth Rims to implement and refine the TMP, and groups like the Moab Friends For Wheelin' worked equally hard. The 2016 settlement agreement (resulting from litigation by groups seeking to vastly expand wilderness designations across BLM and USFS lands with a multiple-use mission) has forced us to spend less time maintaining the trails and more time defending access. This pursuit of re-wilding half of the public lands undermines more practical efforts to conserve natural and social resources. Fortunately the state of Utah has more resources than ever before to assist with trail work, education, and even enforcement. I hope that Grand County will increase its support of these efforts instead of supporting the extreme positions of wilderness-expansion groups that have favored a more adversarial approach to other stakeholders and to the land managers. RwR is open to further restrictions that are carefully developed, and we recognize that Labyrinth Rims is important to a variety of recreationists and wildlife. That said, it contains the most important motorized routes in the whole county, which provide a critical component to Moab's economy and quality of life.

While there may be a few ways in which even Alternative B "falls far short of adequately reducing route density, zoning areas for different recreational opportunities, protecting non-motorized public land experiences, and preserving the Labyrinth Canyon wilderness river experience," in most ways it goes too far. Please consider RwR's perspective on the four issues that your draft letter outlines:

1. "Protecting all of Labyrinth Canyon for a quiet, wilderness river experience."

RwR supports providing a Labyrinth Canyon river opportunity that is relatively primitive. Since 2008, we have helped to block off closed routes that approach the river, and we even worked with the BLM to plan and implement additional closures along the river (none of which is reflected in the baseline analysis of this TMP unfortunately). We are open to closing even more, and the Dead Cow Loop in particular could be rerouted to further reduce sound along the river (not to mention that reasonable sound standards can muffle the loudest vehicles). That said, the commission's draft letter demands the closure of all routes within earshot of the Green River between Ruby Ranch and Mineral Bottom (presumably other than the very end of Spring Canyon graded road). This expectation is not reasonable for a stretch of river with a Scenic designation that continues to have motor boats go up and down since the days of the Friendship Cruise. Getting a taste of the Green River setting is vital to motorized recreationists. Float trips are uncommon for at least half the year. Hey Joe Canyon is an Easter Jeep Safari route unlike any others. Likewise the Dead Cow Loop is unique among motorcycle trails and, although a lot of it is riparian, most of it has a slickrock base that prevents sedimentation and erosion issues typical of riparian routes. Since the west side of Labyrinth Canyon was designated as wilderness, some stakeholders wish to duplicate this designation on the east side. Actually rivers provide excellent wilderness boundaries, thereby providing a different opportunity on each side of the river. There are already primitive opportunities on the east side, and RwR is open to enhancing them, but those seeking a more expansive wilderness experience may need to get a pack raft and cross to the river's west side.

## 2. "Reducing route density and separating non-motorized and motorized recreational uses."

Wilderness expansion groups have sought to travel plan via buffer zones for many years, but their expectations that areas be a mile (or even just a half-mile) away from routes overlooks several factors, including the fact that:

- A. Most of the motorized routes will remain relatively low in use provided that the travel network remains extensive,
- B. The sound exposure to a group of motorized recreationists is momentary,
- C. Topography buffers sound and sight in many parts of the canyon country, and
- D. Reasonable sound standards will substantially mitigate negative impacts.

Noise is a serious concern, which is why RwR supports sound standards that would require roughly a quarter of motorized recreationists to pay upwards of a thousand dollars for a quieter exhaust system. That said, all parties need to have realistic expectations. Should a person who drives fifty miles to hike one mile be guaranteed perpetual silence? Use conflicts often result from excessive vehicle sound, but they sometimes result from critics of motorized recreation breeding intolerance, whether deliberate or inadvertent.

Regarding the "the rims above Labyrinth Canyon and its side canyons in the Mineral Point, Hell Roaring Rim, Spring Canyon Point and Ten Mile Point areas, including along the northern boundary of Canyonlands National Park (Horsethief Point)," although RwR is not opposed to identifying a few routes where negative impacts are excessive, most of the routes that remain open going to and even along these rims are sufficiently far from other users that any negative impacts are negligible. That's the nature of cliffs that stand upwards of a thousand feet.

Regarding "the Gemini Bridges/Magnificent 7, Horsethief, and Navajo Rocks trail areas (including allowing motorized use on portions of the Gold Bar Rim, 7-Up, and Coney Island trails) and Monitor and Merrimac area," although RwR is not opposed to identifying a few routes where uses could be separated by moving the motorized or non-motorized use, keep in mind that Gemini Bridges / Poison Spider is a "motorized backcountry touring" focus area (which means that the BLM zoned it to focus on 4WD trails). Since your letter implies that motorized use should be prohibited on several roads in this area, I strongly suggest that you approach the MTC before making such an implication to the BLM. Also, to be totally upfront, RwR would not even consider closing Gold Bar Rim because it's a premier Easter Jeep Safari route that connects to Golden Spike and Poison Spider.

Nevertheless there may be good reason to build some more bicycle trail, improve the condition of motorized trails, or close short segments of motorized trail somewhere around UT-313 as needed (even though several motorized trails in this area have already been closed after the 2008 TMP for the very purpose of accommodating the development of mountain-bike trails).

### 3. "Protecting wildlife habitat."

Desert bighorn sheep are important residents of southeast Utah. The 2008 TMP already closed many routes in bighorn sheep habitat, and RWR has subsequently contributed hundreds of hours with the BLM planning and implementing TMP amendments to further avoid lambing habitat, migration corridors, etc. The elongated nature of this habitat requires crossing it in places in order to get anywhere. By avoiding springs and rims, trails can be routed to provide sufficient escape terrain for the sheep. While RWR is open to considering further restrictions, too many more restrictions would make it a lot harder to gain compliance with the resulting TMP, undermining the predictable organization of travel patterns that a TMP is supposed to provide. The most effective way to benefit sheep would be to bolster trail work, enforcement, and education efforts to ensure that vehicles stay out of closed areas and that drivers and riders understand the importance of yielding to wildlife (not to mention the reward of stopping to watch wildlife in their natural habitat).

### 4. "Protecting cultural resources."

Cultural resources are valuable and irreplaceable, and there may be further restrictions in the form of reroutes or outright closures warranted beyond the many routes closed since 2008, but most protection is best accomplished through delineating the routes to prevent braiding, educating visitors to recognize and respect cultural resources, and even to recognize vandalism or looting so it can be reported. The presence of a route near a cultural site should make vandals or looters worry about getting caught. Closing a route just because it goes near a site would keep most of the public out while failing to keep a criminal out, thereby emboldening the criminal with more privacy. We all need to do a better job of educating new visitors and enforcing the protection of cultural resources, and we don't need to advertise the location of most sites, but keeping lawful people far away from sites is unlikely to stop criminals or to be a winning strategy in the long run.

For these reasons, we ask you to consider RWR's points and work with the MTC before taking a position on the Labyrinth Rims TMP.

Sincerely,



Clif Koontz  
Executive Director