



GRAND COUNTY COMMISSION
Mary McGann (Chair) · Gabriel Woytek (Vice Chair)
Evan Clapper · Jacques Hadler · Trish Hedin
Sarah Stock · Kevin Walker

May 18, 2021

Nicollee Gaddis-Wyatt
82 East Dogwood
Moab, UT 84532

Dear Ms. Gaddis-Wyatt,

Here are Grand County's preliminary comments on the Labyrinth Rims/Gemini Bridges travel planning process.

Public lands in Grand County, and more specifically in the Labyrinth/Gemini Bridges area, offer a wide variety of recreational opportunities. We think the top priority for the future travel plan is to make sure that there is a fair allocation of recreational opportunities amongst various groups, even as use numbers increase.

We hope that in the future, hikers, bikers, jeepers, UTVers, river rafters and others will all have ample recreational opportunities in the Laby/GB area. This will not happen by accident. It will require a careful "zoning" approach by the BLM.

In particular, it is important to provide opportunities for quiet forms of recreation, out of earshot of motorized trails. We think the travel plan should ensure that a reasonable percentage of the planning area is more than one mile from a road or motorized trail.

The present road network is not the result of a careful planning process that kept recreational opportunities in mind. Rather, it is largely the result of historical accident, with the location of old seismic lines and mineral exploration routes from decades ago playing a dominant role in where motorized routes are located today. The current planning process is an opportunity for BLM to implement a more rational travel plan that will serve us well decades into the future.

Here are some principles we hope the BLM will keep in mind when constructing the future travel plan. We realize that in some cases these principles will conflict.

- We would like to see a wide variety of motorized recreation opportunities available in the future.
- Areas where quiet recreation is popular should be separated from (i.e. out of earshot of) motorized routes. This includes canyon bottoms, canyon rims, and the Green River corridor.

Commission's Office · 125 E. Center St. · Moab, UT 84532 · (435) 259-1346 ·
www.grandcountyutah.net

- There are very few riparian areas in this semi-desert area, and we don't think it makes sense to place motorized routes in riparian areas.
- Habitat important to wildlife should be protected. This includes, specifically, bighorn sheep habitat.
- Areas with important archeological and cultural resources should be protected.
- The west side of Labyrinth Canyon is designated wilderness, and Grand County has endorsed wilderness for the east side in the past. We think the travel plan should be consistent with likely future wilderness designations in Labyrinth Canyon.

It is our understanding that with the current travel plan roughly 95% of the planning area is within half a mile of a motorized route and less than 1% is more than a mile from a motorized route. This does not seem balanced to us. We hope the new travel plan will result in 15% of the area more than a mile from a motorized route and 30% more than half a mile from a motorized route. We also request that each alternative be evaluated by this metric. In other words, for each alternative studied in detail the BLM should disclose what percentage of the planning area is more than 0.5, 1, or 2 miles from a motorized route. This will help the public and Grand County determine how well each alternative is doing in terms of a balanced allocation of recreational opportunities.

Grand County prides itself in offering a wide variety of public lands recreation opportunities. With careful travel planning, this wide variety can be preserved, despite rising use levels. At low use levels, hikers, bikers and jeepers can all use and enjoy the same trail. The users are not separated in space, but they are separated in time and rarely cross paths. At high use levels this sort of trail sharing no longer works and it becomes necessary to separate different types of use in space rather than time. In other words, it becomes necessary to “zone” the backcountry into non-motorized and motorized areas. If this is done carefully and fairly, then we can look forward to a future where Grand County continues to offer a wide variety of recreational opportunities.

Sincerely,



Mary McGann
Chair, Grand County Commission

Subject: agenda items L re Labyrinth Rims and Q re Public Lands Bill
From: Clif Koontz
To: Grand County Commissioner Grand County Commissioners
Date: Tue, May 18 at 12:44 AM

Grand County Commission- Please work closely with the Motorized Trails Committee (MTC) early and often on matters that affect motorized trails. OHV riding is the primary activity to be regulated by Labyrinth Rims travel planning and by a public lands bill (if the one from Emery County is any indication). Therefore we request that the MTC be central to the conversation.

I have several concerns about the commission's draft scoping comments on the Labyrinth Rims / Gemini Bridges Travel Management Area (TMA). Specifically within this TMA, OHV groups like Ride with Respect and Moab Friends For Wheelin' have each spent several-thousand hours implementing and refining the current travel plan with the BLM.

The draft comments don't seem to consider that this TMA is the primary place where OHV recreation occurs, while it's surrounded by more non-motorized opportunities in every direction (the Book Cliff WSAs to the north, Arches NP to the east, Canyonlands NP to the south, and Labyrinth Rims Wilderness to the west, which can be reached by pack-raft rather than having to drive all the way around on highways 191 / 70 / 24). Just as I don't expect many motorized trails in these four areas, I don't expect many non-motorized trails to take precedence in the TMA.

The current travel plan is not the result of historical accident. It is the result of a careful planning process, one that closed HALF of the existing routes in 2008, and one that received the full support of Grand County. Conserving non-motorized recreation opportunities (that "includes canyon bottoms, canyon rims, and the Green River corridor") is an important goal, but it doesn't necessarily require being out of earshot of motorized routes, which could require multi-mile buffers to guarantee silence. Since motorized routes are still in ample supply, most of them are still lower in use, so the sound is infrequent. Also vehicle sound would be significantly reduced by reasonable sound regulations applied to all parts of the county. Yes, areas of the TMA that are important to wildlife or have important cultural resources should be protected, but that doesn't necessarily mean eliminating motorized routes.

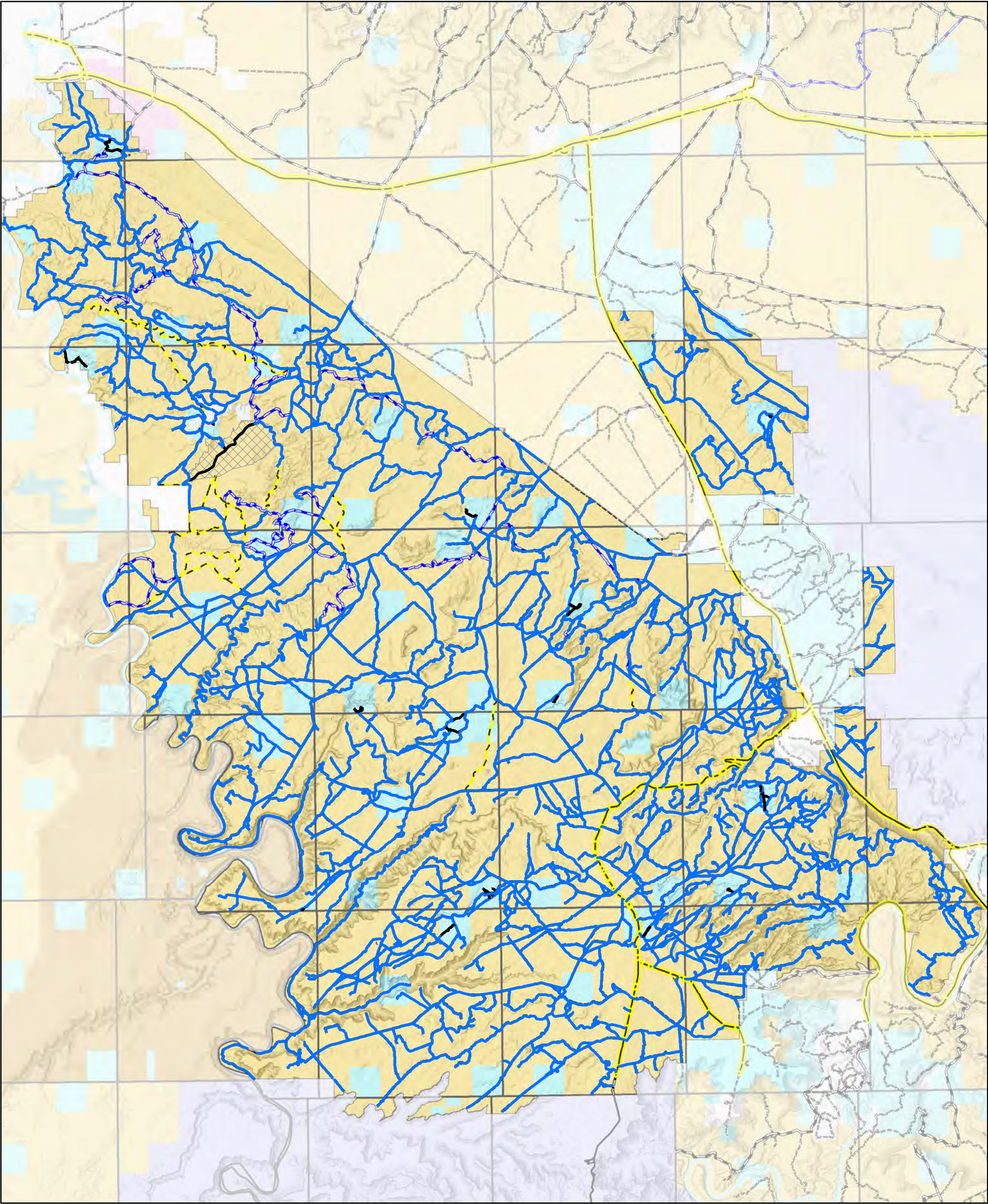
The Dingell Act that designated Labyrinth Wilderness specifically prohibits buffering, and the Green River makes a natural and practical wilderness boundary. All wilderness that Grand County has supported in the TMA was completely compatible with the current travel plan, and requires no further route closures.

I'm not suggesting that no further route closures be considered, but it would be new territory for the county, and should result from deliberation as well as due consideration of the tremendous work that yielded the current travel plan. Don't simply tell the BLM that you expect 30% of the TMA to be at least a half-mile away from any motorized route. For

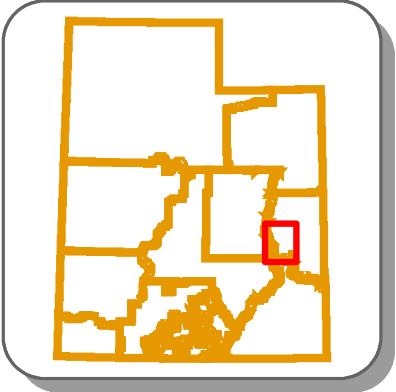
one thing, topography blocks sound from traveling across many parts of the TMA. On top of being unnecessary, this expectation would require closing over a hundred miles of routes, and several-hundred miles when combined with eliminating routes within earshot of popular non-motorized recreation areas (that "includes canyon bottoms, canyon rims, and the Green River corridor").

These concerns should be worked through by a process that squarely engages the MTC. On federal lands, the best decisions result from cooperation at all three levels of government. Especially when it comes to travel planning and even public-lands bills that tend to regulate motorized recreation more than any other activity, please commit to starting with the MTC. Thanks -Clif

Executive Director
Ride with Respect
435-259-8334 land
201-741-0361 cell



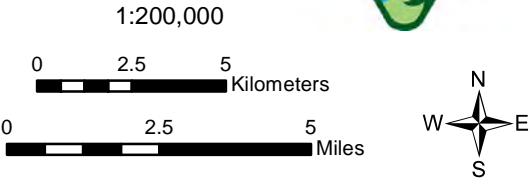
Location Map
Utah BLM Field Office Boundaries



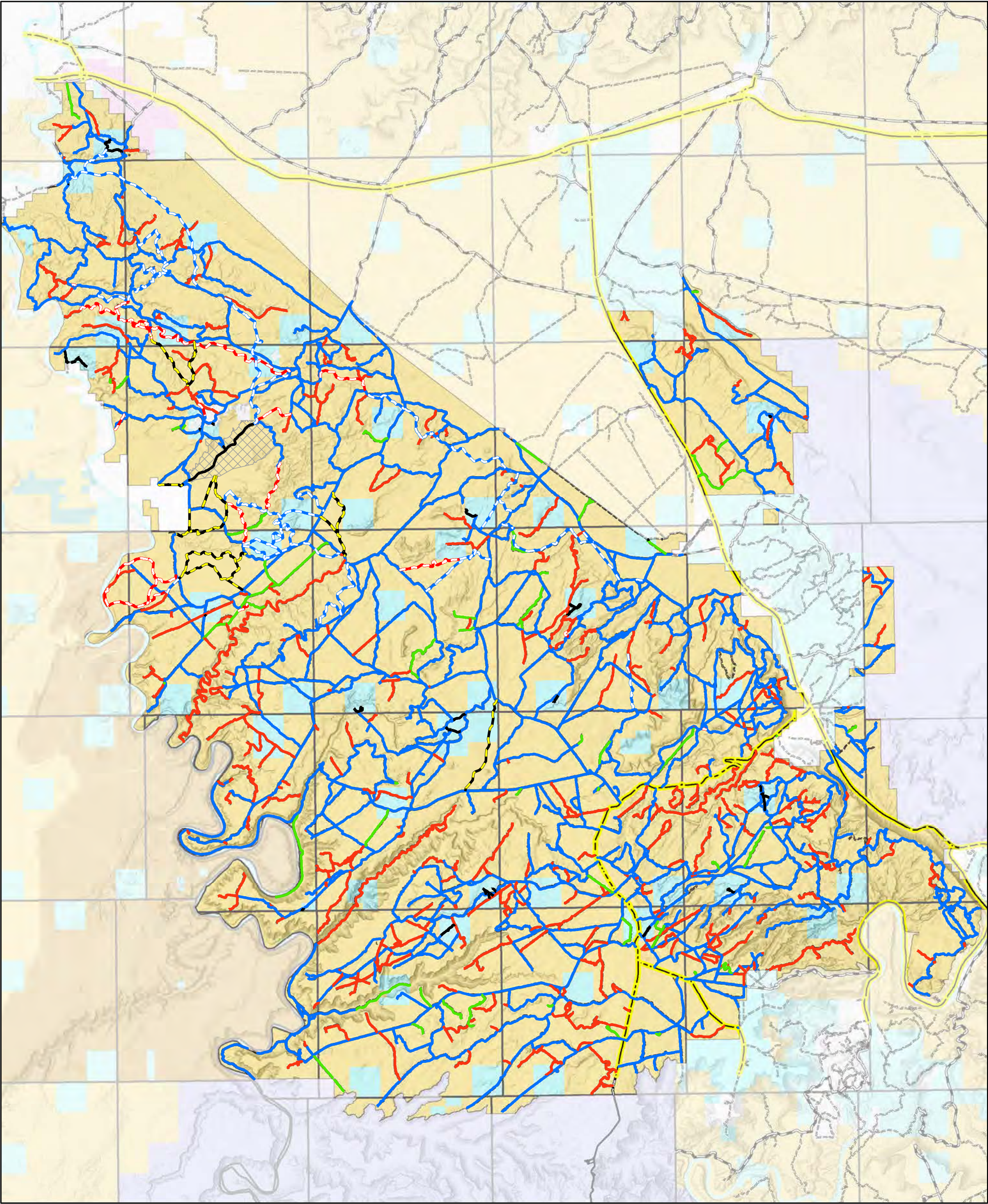
Date: 7/27/2021

Transportation Plan Alt A

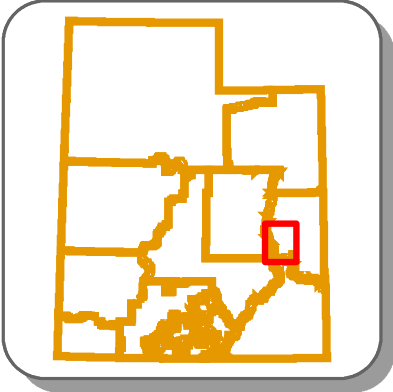
- Open
- Not Assesed
- Limited to Vehicles Under 50 Inches
- Limited to Motorcycle Only
- White Wash Sand Dunes Open OHV Area
- BLM Wilderness Area
- Bureau of Land Management (BLM)
- Military Reservations and Corps of Engineers
- National Park Service (NPS)
- Private
- State
- State Parks and Recreation
- State Wildlife Reserve/Management Area



No warranty is made by the Bureau of Land Management as to the accuracy, reliability, or completeness of these data for individual use or aggregate use with other data.

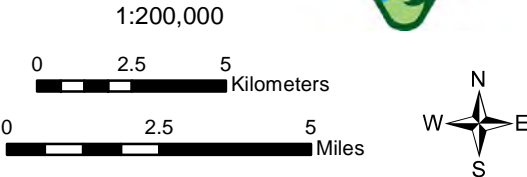


Location Map
Utah BLM Field Office Boundaries

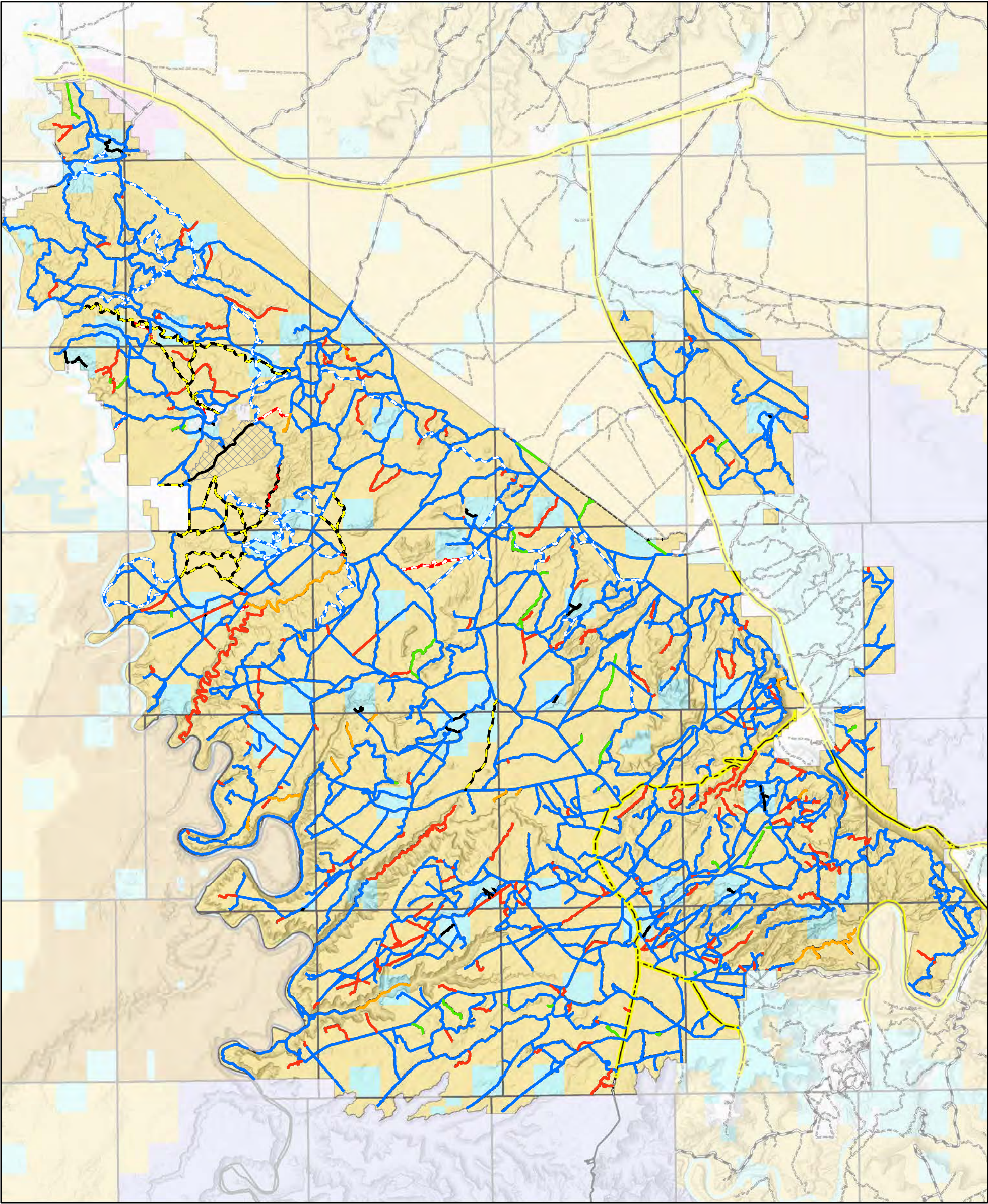


Date: 7/29/2021

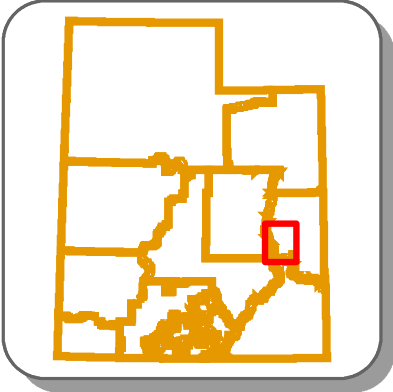
- Full-Sized Vehicle Transportation Plan Alt B**
- Open
 - Administrative and authorized use only.
 - Closed
 - Not Assessed (Non-BLM Route)
- Motorcycle ATV Transportation plan Alt_B**
- Limited to Vehicles Under 50 Inches
 - Limited to Motorcycle Only
 - Closed
- White Wash Sand Dunes Open OHV Area
- BLM Wilderness Area
- Bureau of Land Management (BLM)
- Military Reservations and Corps of Engineers
- National Park Service (NPS)
- Private
- State
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Location Map
Utah BLM Field Office Boundaries



Date: 7/29/2021

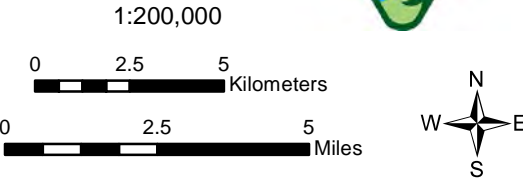
Full-Sized Vehicle Transportation Plan Alt C

- Open
- Administrative and authorized use only.
- Seasonal Closure
- Closed
- Not Assessed (Non-BLM Route)

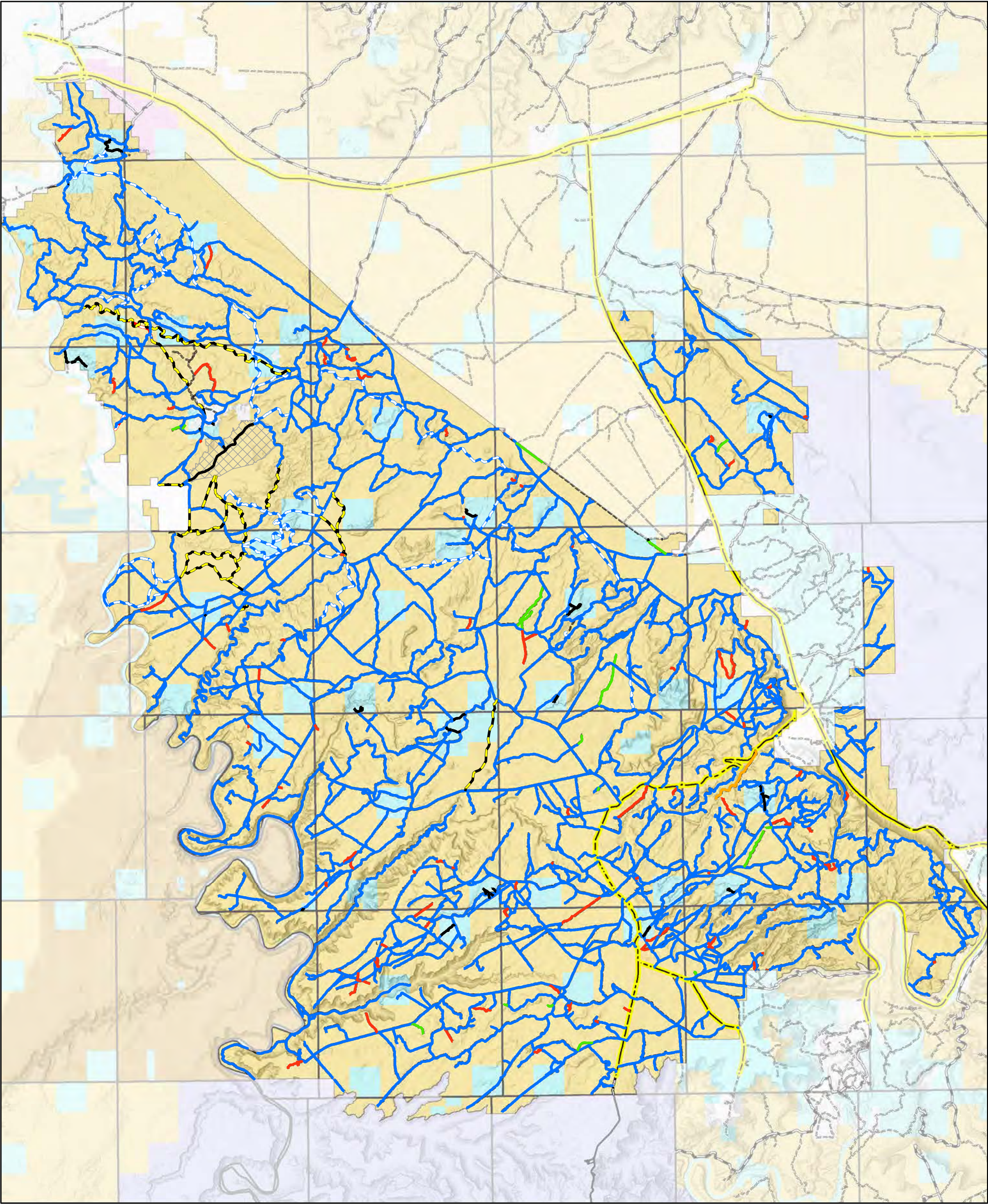
Motorcycle ATV Transportation plan Alt C

- Limited to Vehicles Under 50 Inches
- Limited to Motorcycle Only
- Limited to Vehicles Under 50 Inches (Seasonal Closure)
- Closed

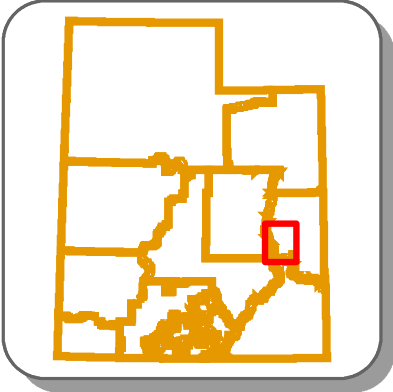
- White Wash Sand Dunes Open OHV Area
- BLM Wilderness Area
- Bureau of Land Management (BLM)
- Military Reservations and Corps of Engineers
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Location Map
Utah BLM Field Office Boundaries



Date: 7/29/2021

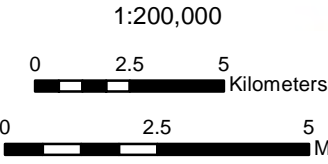
Full-Sized Vehicle Transportation Plan Alt D

- Open
- Seasonal Closure
- Administrative and authorized use only.
- Closed
- Not Assessed (Non-BLM Route)

Motorcycle ATV Transportation plan Alt D

- Limited to Vehicles Under 50 Inches
- Limited to Motorcycle Only
- Limited to Vehicles Under 50 Inches (Seasonal Closure)
- Closed

- White Wash Sand Dunes Open OHV Area
- BLM Wilderness Area
- Bureau of Land Management (BLM)
- Military Reservations and Corps of Engineers
- National Park Service (NPS)
- Private
- State
- State Parks and Recreation
- State Wildlife Reserve/Management Area



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GRAND COUNTY COMMISSION
Mary McGann (Chair) · Gabriel Woytek (Vice Chair)
Evan Clapper · Jacques Hadler · Trish Hedin
Sarah Stock · Kevin Walker

October 19, 2021

Nicollee Gaddis-Wyatt
Moab Field Office Manager
Bureau of Land Management
82 East Dogwood
Moab UT, 84532

Dear Nicollee,

The Grand County Commission sent two letters in May 2021 regarding our desire to be a cooperating agency with the BLM in regards to the Labyrinth Rims/Gemini Bridges Travel Management Plan (TMP). We provided substantive comments to your office on May 18, 2021, and have received no direct communication or updates about the process from your office since then. We were therefore surprised to see preliminary alternative maps released to the public without any opportunity to engage beforehand as a cooperating agency in the process.

The BLM has an obligation to local governments and cooperating agencies to engage early and often in planning processes. As the entirety of the Labyrinth Rims/Gemini Bridges TMP area lies within Grand County, we were expecting significant engagement with the BLM. It is standard practice for BLM to engage cooperating agencies for input early and consistently throughout a travel planning process, including frequent updates and in-person meetings to discuss the substance of planning documents and concerns prior to the release of public drafts. None of this has happened with your office to date.

We request that the Moab BLM postpone further work on the preliminary alternatives and a draft environmental assessment until meaningful cooperation and collaboration can occur with the County. We do not believe that our input has been appropriately considered, as your office has not engaged us as cooperators on the TMP and none of the preliminary alternatives reflect our vision for the future of these public lands as set out in our May 18, 2021 letter. While preliminary Alternative B most closely aligns with our comments to date, it 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. Many of our concerns with the preliminary alternatives should have been discussed prior to public release of the documents, and we request additional time for meaningful engagement as a cooperating agency *prior to the development of the draft EA alternatives*.

We intend to provide additional detailed comments on the preliminary alternatives, but for the sake of clarity will outline some primary concerns upon our initial review of the alternatives. While Alternative B is most in line with the goals set out in our May 18th letter, it falls

significantly short of our vision for this travel planning area. Necessary modifications to Alternative B include:

- **Protecting all of Labyrinth Canyon for a quiet, wilderness river experience.** This includes closing all of the routes within the canyon and along the river bottom, namely the Hey Joe OHV route (north and south of where it meets the river) and the Hell Roaring OHV route north of Mineral Canyon. We do support Alternative B's closure of Ten Mile Canyon, the bottom of Hell Roaring Canyon, and the Dead Cow/Tubes motorcycle route.
- **Reducing route density and separating non-motorized and motorized recreational uses.** Alternative B does not adequately reduce route density or balance motorized and non-motorized recreational uses. Alternative B would designate 900 miles of motorized routes, with 87% of the planning area within a ½ mile of a route. Alternative B would also designate an extensive network of routes to 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). Alternative B would designate motorized routes in areas where human-powered recreation is popular, including 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. In many of these locations, notably near the 7-Up and Gold Bar Rim trails, off-road vehicles repeatedly fail to stay on designated routes and instead travel cross-country further impacting resources and other public land users.
- **Protecting wildlife habitat.** Alternative B does not adequately protect wildlife habitat or riparian areas, with nearly 740 miles of motorized route proposed within crucial desert bighorn sheep habitat. Many of these routes fall in preferred open habitat with adjacent steep and rocky areas, including canyons, gulches, steep slopes, and river benches. We do support Alternative B's attempt to protect habitat through a reduction in route density in the vicinity of Sevenmile Canyon and Day Canyon Point.
- **Protecting cultural resources.** There is a positive correlation between vandalism and inadvertent damage to cultural resources and the proximity of those resources to designated motorized routes. Reducing route density will help to better protect cultural resources throughout the planning area, and we look forward to reviewing BLM's cultural resources inventory for this planning process in order to provide additional comments.

We hope that this letter adequately expresses Grand County's disappointment with the lack of engagement by your office on the Labyrinth Canyon/Gemini Bridges TMP, restates our goals with this planning process and the initial concerns we have with the preliminary alternatives, and allows us to establish a meaningful cooperating agency relationship before further action is taken on a draft environmental assessment.

Sincerely,

Mary McGann, Chair
Grand County Commission



GRAND COUNTY COMMISSION
Mary McGann (Chair) · Gabriel Woytek (Vice-Chair)
Evan Clapper · Jacques Hadler · Trish Hedin
Sarah Stock · Kevin Walker

Nicolee Gaddis-Wyatt
82 East Dogwood
Moab, UT 84532

4-27-2021

Dear Nicolee,

I'm writing to let you know that the Grand County Commission will be sending comments on the Labyrinth Rims/Gemini Bridges TMA in May, after we have had a chance to meet and discuss.

We take our role as a cooperating agency seriously, and look forward to playing a significant role in this planning process. There is an intimate relationship between BLM's management of public lands and Grand County's management of tourism-related businesses, with effects (both good and ill) running in both directions.

Sincerely,

Mary McGann
Chair, Grand County Commission

Memorandum of Understanding
Between
The Department of the Interior, Bureau of Land Management,
Moab Field Office
and
Grand County
as a Cooperating Agency
for Travel Management Planning

I. Introduction

This Memorandum of Understanding (MOU) establishes a Cooperating Agency relationship between the Bureau of Land Management (BLM) Moab Field Office (MFO) and Grand County (the County or "Cooperator") for the purpose of preparing the Labyrinth/Gemini Bridges and Dolores River Travel Management Plans (TMP) under the Settlement Agreement in *Southern Utah Wilderness Alliance, et al, v. U.S. Department of the Interior, et al.*

The BLM is the lead federal agency for development of the Labyrinth/Gemini Bridges and Dolores River TMPs. This MOU describes responsibilities and procedures agreed to by the the County as Cooperating Agency and the BLM ("the Parties").

The Cooperating Agency relationship established through this MOU shall be governed by all applicable statutes, regulations, and policies, including the Council on Environmental Quality's National Environmental Policy Act (NEPA) regulations (in particular, 40 CFR 1501.6 and 1508.5), the BLM's planning regulations (in particular, 43 CFR 1601.0-5, 1610.3-1, and 1610.4), and the Department of the Interior's Manual regarding NEPA (516 DM 2.5).

II. Purpose

This MOU will accomplish the following:

- A. Designate the County as a Cooperating Agency in the TMP processes.
- B. Provide a framework for cooperation and coordination between the BLM and the Cooperator that will ensure successful completion of the TMPs/EAs in a timely, efficient, and thorough manner.
- C. Recognize the BLM as the lead agency with responsibility for the completion of the TMP and the Decision Record (DR).
- D. Describe the respective responsibilities of each of the Parties in the TMP processes.

III. Authorities for the MOU

- A. The authorities of the BLM and the County to enter into and engage in the activities described within this MOU include, but are not limited to:
 - 1. National Environmental Policy Act of 1969 (42 U.S.C. 4321 et seq.).
 - 2. Federal Land Policy and Management Act of 1976 (43 U.S.C. 1701 et seq.).

3. Settlement Agreement in *Southern Utah Wilderness Alliance, et al, v. U.S. Department of the Interior, et al.*

B. Regulations implementing the above authorities:

1. Council on Environmental Quality regulations (40 CFR 1501 et seq.)
2. BLM Planning regulations (43 CFR 1601 et seq.)
3. BLM Designation of Areas and Trails regulations (43 CFR 8342 et seq.)

IV. Roles and Responsibilities

A. BLM Roles and Responsibilities:

1. As lead agency, the BLM retains final responsibility for the TMP process and the content of all TMP, NEPA, and decision documents. In meeting these responsibilities, the BLM will follow all applicable statutory and regulatory requirements.
2. Enable the County to be a meaningful Cooperator by providing the following opportunities:
 - a) Involvement in identifying issues relative to the TMP process;
 - b) Involvement in identifying or providing data that is suitable, available, and relevant to the TMP process;
 - c) Collaboration in the development of alternatives,
 - d) Other opportunities as identified in Attachment A
3. The BLM MFO will provide the County three weeks advance review periods of relevant data prior to public scoping, the preliminary route evaluation process, and release of the draft TMPs.
4. To the fullest extent consistent with its responsibilities as lead agency, the BLM will consider the comments, recommendations, data, and/or analyses provided by the Cooperator in the TMP process, giving particular consideration to those topics on which the Cooperator is acknowledged to possess special expertise.

B. Cooperating Agency Roles and Responsibilities:

1. Assist the BLM in the identification of issues and concerns along with associated data relative to the TMP process. These items may include:
 - a) Information relative to forest and rangeland health and conditions, and requirements for improving the health of each, and the value of such improvements to the the County's economic situation.
 - b) Information relative to transportation and off-highway vehicle management and its value to the County's economic situation.
 - c) Information relative to recreation and its value to the the County's economic situation.

- d) Information relative to baseline air quality conditions and trends, and other environmental quality issues.
- e) Information relative to general social and economic conditions within the Travel Management Areas (TMAs).
- f) Information relative to water resources within the TMAs including among other possibilities, water rights, water quality and quantity, risk factors, condition or trend, or areas where future water developments may be required.
- g) Other such information relevant to TMP or data needs.

2. The Cooperator will provide information, comments, and technical expertise, as well as the associated data and analysis supporting such submissions, to the BLM regarding those elements of the TMP in which it has jurisdiction or special expertise or for which the BLM requests its assistance.

3. Within the areas of its jurisdiction or special expertise, the Cooperator may participate in any of the activities identified in Attachment A. These activities include, but are not limited to: providing guidance on public involvement strategies, identifying data needs, participating in route evaluation meetings, collaborating in the development of alternatives and providing written comments on working drafts of the TMP and supporting documents.

4. The County in its special status as a Cooperating Agency, agrees all internal working draft documents for the development of the Labyrinth/Gemini Bridges and Dolores River TMPs are pre-decisional and will ensure they will not be available for review to individuals or entities other than the Parties to this agreement.

5. Should communications with the BLM's contractor become necessary, such communication will only take place through the BLM's representative.

C. Responsibilities of the Parties:

- 1. The Parties agree to participate in the TMP process in good faith and make all reasonable efforts to resolve disagreements.
- 2. The Parties recognize the time sensitivity associated with preparation of the TMP in order to meet the requirements of the Settlement Agreement and will adhere to prescribed timeframes.
- 3. Each Party agrees to fund its own expenses associated with the Labyrinth/Gemini Bridges and Dolores River TMP processes.

V. Agency Representatives

Each Party will designate a representative and alternate representative to act as points of contact in ensuring coordination between the Cooperator and the BLM during the TMP process. Designations and contact information shall be provided upon signing of this MOU.

Each Party may change its representative at will by providing written notice to the other Party.

VI. Administration of the MOU

A. This MOU becomes effective upon signature by the authorized officials of the BLM and the Cooperator.

B. This MOU may be amended through written agreement of all signatories.

C. If the Parties find they cannot work together toward a common goal and efforts at dispute resolution are unsuccessful, any Party may end its participation in this MOU by providing written notice to the other Party. If not terminated earlier, this MOU will end when the Decision Record (DR) for the Labyrinth/Gemini Bridges and Dolores River TMPs are approved by the BLM Authorized Officer.

VIII. Signatures

The Parties hereto have executed this MOU on the dates shown below.

Grand County
125 East Center
Moab, UT 84532


Grand County Council Chair - *vice chair*

3/4/19
Date

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


Acting Field Manager

Date 3/7/19

Attachment A

Cooperating Agency Participation in the BLM Moab Field Office's Labyrinth/Gemini Bridges and Dolores River Travel Management Plans

| | TMP Stage | Potential Activities of Cooperating Agencies (CAs) within their acknowledged areas of jurisdiction or special expertise |
|----|---|---|
| 1 | Initiation | Meet with the BLM to become familiar with travel management process and identify opportunities to participate. |
| 2 | Collect inventory data from CA | Identify data needs; provide data and technical analyses within the CA's jurisdiction or special expertise. |
| 3 | CA review of route inventory data | Once the BLM has compiled GIS route inventory data, provide comments to the BLM during a three-week review prior to public scoping. |
| 4 | Conduct public scoping | May include, but is not limited to: Provide input on issues that may help drive general alternative development; identify relevant local and regional organizations and interest groups; identify connected, similar, and cumulative actions; identify other relevant agencies. CAs may provide additional comments during public scoping if so desired. |
| 5 | Develop a reasonable range of alternative designated route networks | Collaborate with field manager in developing alternatives. [Decision to select alternatives for analysis is reserved to the BLM.] |
| 6 | Conduct interdisciplinary route evaluation meetings | CA may physically participate in the route evaluation meetings or they may provide information on specific routes that would inform the route evaluation. |
| 7 | CA review of preliminary route evaluation process | Provide comments to the BLM during a three-week review period regarding the results of the interdisciplinary preliminary route evaluation process, including the travel management plan scoping report, maps of preliminary route designation alternatives, draft route reports, and the baseline monitoring report for disturbances within WSAs, natural areas, and BLM-inventoried lands with wilderness characteristics. |
| 8 | Post preliminary route evaluation process documents online | Commensurate with the level of public and stakeholder interest in the TMP, the BLM may seek further public and stakeholder interest through public meetings and/or other engagement efforts regarding the preliminary route evaluation documentation. It remains the discretion of each field office to determine whether a formal public comment period is warranted at this stage. The BLM may hold a CA meeting. |
| 9 | Finalization of documentation and preparation of draft TMP | [Action reserved to the BLM.] |
| 10 | CA review of administrative draft TMP | Provide comments to the BLM during a three-week review period on the administrative draft TMP. |
| 11 | Public Comment | The BLM will release draft TMP and EA, updated draft route reports, and associated maps/GIS data for a minimum 30-day public comment period (or longer at the |

| | | |
|----|---|--|
| | Period | BLM's sole discretion). The CAs may provide written, public comments on draft if desired. [Decision to select a preferred alternative and to issue a draft is reserved to the BLM.] |
| 12 | Respond to comments | As appropriate, review comments within the CA's jurisdiction or special expertise and provide assistance in preparing the BLM's responses. |
| 13 | Issue final TMP, EA, Decision Record, and associated map/GIS data to the public | [Action reserved to the BLM.] |
| 14 | Sign Decision Record (DR) | [Action reserved to the BLM.] |



Ride with Respect
395 McGill Avenue
Moab, UT 84532
435-259-8334
501(c)(3)

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,

A handwritten signature in blue ink that reads "Clif Koontz". The signature is written in a cursive, flowing style.

Clif Koontz
Executive Director

AGENDA SUMMARY
GRAND COUNTY COMMISSION MEETING
DECEMBER 7, 2021
Agenda Item: R

| | |
|----------------------|--|
| TITLE: | Approving correspondence to BLM regarding BLM Labyrinth Rims/Gemini Bridges Travel Management Plan |
| PRESENTER(S): | Sarah Stock |

Prepared By:
SARAH STOCK

FOR OFFICE USE ONLY:
Attorney Review:

SUGGESTED MOTION:

I move to approve the attached letters, list of route recommendations, and map for submittal to the BLM to be incorporated into new draft alternative maps for the Labyrinth Rims/Gemini Bridges Travel Management Plan.

BACKGROUND:

The BLM has sought Grand County's input, as a cooperating agency, on the draft Labyrinth/Gemini Bridges Travel Management Plan Environmental Assessment.

In a previous letter, Grand County asked the BLM to provide for a wide variety of recreational opportunities, and in particular that (a) 15% of the planning area be more than one mile from a motorized route, and (b) 30% of the planning area be more than half a mile from a motorized route. The draft EA alternatives fall far short of this, with even Alternative B (the "conservation alternative") having only 2.2% of the planning area more than one mile from a motorized route and 16.5% of the planning area more than half a mile from a motorized route. One of the attached letters asks BLM to consider a wider range alternatives and offers specific suggestions for additional route closures to be considered in at least one of the alternatives. Note that this is not Grand County's recommendation for what the final decision should be. That recommendation will be made after that draft EA is out for public comment.

A separate letter asks BLM to do a more careful job in analyzing user conflicts in the planning area.

ATTACHMENT(S):

- List of Route Recommendations for the Labyrinth Rims/Gemini Bridges Travel Management Plan
- Map
- Route Cover Letter
- Draft EA comments cover letter



GRAND COUNTY COMMISSION
Mary McGann (Chair) · Gabriel Woytek (Vice Chair)
Evan Clapper · Jacques Hadler · Trish Hedin
Sarah Stock · Kevin Walker

December 7, 2021

Nicollee Gaddis-Wyatt
Bureau of Land Management
82 East Dogwood
Moab, UT 84532

Dear Ms. Gaddis-Wyatt,

Thank you for the opportunity to comment on the draft Labyrinth Rims/Gemini Bridges Travel Management Plan Environmental Assessment. Our main comments concern the balance of (or fair allocation of) recreational opportunities in the area.

We were surprised that there is not a more robust and detailed analysis of user conflicts. We think this is among the most important issues for the EA to assess. As use levels increase, the need for addressing user conflicts increases as well. A road network that works well for 2008 use levels is not the same as a road network that works well for 2022 (and beyond) use levels. The public lands road network is crucially important for Grand County, and we want the BLM to get this right.

More specifically:

- The most natural place for a detailed analysis of user conflicts to occur would be in the route reports' assessments of 43 CFR 8342.1(c) issues (user conflicts). But every route report we examined stated "no known conflicts among users or no known resource concerns to minimize for". This was true even for routes that have notorious user conflict issues (e.g. routes along the Green River). We hope that the final EA will correct this problem.
- In Section 3.3, which assesses the impacts of alternatives on recreational opportunities, the primary yardstick used is the number of miles of route open or closed in an alternative. While this yardstick is useful for assessing motorized recreational opportunities, it does not do a good job of measuring non-motorized recreational opportunities. A much better way of assessing non-motorized recreational opportunities is found in Table C.22, which reports the percentage of the planning area that would be more than a certain distance (½ mile, 1 mile, 2 miles) from a motorized route in each of the alternatives. We think there should be a more prominent discussion of these numbers in Section 3.3. In addition to providing an important measure of non-motorized recreational opportunities, this statistic also does a good job of measuring what percentage of the landscape is accessible for motorized recreation (by avoiding the double-counting of closely spaced redundant routes).
- While we think it is important that the route reports assess user conflicts for individual routes, this misses cumulative effects. We think the information in Table C.22 is also

useful in assessing cumulative effects. This is an important supplement to the individual route reports.

Thank you for your efforts on this important planning process. We look forward to seeing the next iteration of the environmental assessment.

Sincerely,

Mary McGann
Chair, Grand County Commission



GRAND COUNTY COMMISSION
Mary McGann (Chair) · Gabriel Woytek (Vice Chair)
Evan Clapper · Jacques Hadler · Trish Hedin
Sarah Stock · Kevin Walker

December 7, 2021

Nicollee Gaddis-Wyatt
Bureau of Land Management
82 East Dogwood
Moab, UT 84532

Dear Ms. Gaddis-Wyatt,

Thank you for considering changes to the current draft alternatives for the Labyrinth Rims / Gemini Bridges travel plan revision.

We wrote to you in May 2021 (attached) asking that the travel plan provide a balanced spectrum of opportunities for both motorized and non-motorized recreation. More specifically, we asked that 30% of the planning area be more than a half mile from a motorized route and 15% of the planning area be more than one mile from a motorized route.

We were disappointed that none of the draft alternatives came close to meeting this goal. We were also disappointed to discover that even for routes with the highest levels of user conflict, the BLM's route reports stated "no known conflicts among users". We think that user conflicts and a fair allocation of recreational resources are among the most important issues for the travel plan to address. We hope that when the draft Environmental Assessment is eventually released to the public, it will be clear that the BLM has taken these issues seriously.

We have attached a list of routes which are open in all of the current draft alternatives, but that we think should be closed in at least one of the alternatives. We hope that you will modify Alternative B accordingly, and also modify Alternative C to keep it midway between Alternatives B and D.

Because of time constraints, the attached recommendations still fall well short of the goals mentioned in the second paragraph above. Please let us know if there is time for us to do additional research and send you a supplemental list of recommendations.

We encourage the BLM to make greater use of "administrative use only" designations in cases where the major reason for leaving a route open is an administrative need (e.g. maintaining livestock infrastructure). We also think the BLM should consider making certain routes open to full-sized vehicles only (i.e. open to Jeeps but not motorbikes or UTVs). On average, full-sized vehicles are much quieter than motorcycles or UTVs, and this seems like a possible way to reduce conflicts with quiet recreation while still providing some opportunities for motorized recreation.

Finally, we note that there is a distinction between asking for something to be carefully studied in an alternative and asking that something be part of the final decision. In this letter we are only addressing alternatives. In a future letter, after we have seen the BLM's analysis of a wide range of alternatives, we will weigh in on what we think the final decision should be.

Sincerely,

Mary McGann
Chair, Grand County Commission

Attachment: May 18, 2021 Letter to the BLM

December 7th, 2021

**Specific Grand County Routes Recommendations
Labyrinth Rims/ Gemini Bridges TMP**

*See accompanying map. The following listed routes are seen in purple. We recommend analysing these routes for closure in Alternative B of the forthcoming EA.

Spring Canyon to Hey Joe Canyon and from Spring Canyon downstream on the Green River: D1527, D1526

The presence of motorized vehicles along this stretch of canyon bottom is incredibly impactful to river users. In order to minimize conflict, ease tensions in the region, and allow a huge number of boaters a wilderness quality experience, we believe emphatically that this route should be closed to motorized vehicles.

Dead Cow Motorcycle Route: DC5, DCC1, DC3, DC4, DCH1

This route is closed in Alternative B. We support the closure. This is another motorized route that has high audial impact for river users at the popular Three Canyon campsite.

Hell Roaring Canyon down to County B road 129 at Mineral Canyon: D1223

This route should be closed or at the very least gated for authorized use only. Once again, the motorized route degrades the quiet experience of thousands of boaters annually.

Hell Roaring Canyon: D1223

In Alternative C, this route is left open half way up the canyon. This should be changed to administrative access in this alternative. This area is bighorn sheep habitat.

Ten Mile Wash Canyon: D2759

This riparian area is important for wildlife, especially bighorn sheep. The motorized route has huge impacts on the health of the stream, increasing erosion and turbidity. The BLM proposes closure on Alternatives B, which we agree with, however Alternative C only has proposed seasonal closures which would continue to impact wildlife and the stream channel.

Day Canyon Point: D1625, D1622, D1628, D1627

We support the closure recommended in Alternative B. Hiking focus area as well as important bighorn lambing.

Gold Bar Rim: D1579

We suggest limiting to full sized vehicles to protect the hiking intensive zone around Gold Bar from nuisance noise.

Rusty Nail: D1592

This route is a recently opened deadend and redundant route off of Gold Bar Rim. Noise from this route impacts people at nearby popular hiking areas. It should be closed.

Bull Canyon: Hiking focus area

D1602: Dry Fork Bull Canyon Bottom

D1775

D1773, D1679, D1659 (part)

D1777 (part)

Routes on the North Rim of Hell Roaring: Wilderness type management- backcountry hiking focal area

D1506

D1497

D1511, D1514

D1503

D2014, D2015, D2016, D2018, D2017, D7209, D2020, D2022, D2023

D2031

Routes at the Mouth of Hell Roaring:

D1270

D1266, D1265, D1262, D1255 (part)

D1460, D1463, D1467

D1468, D1470

South and East of 313 (Near Intrepid Well Road) - Horsethief Trails MTB focus area routes:

D1946, D1948, D1951, D1952, D1953 (only the end near 1952) - Mag 7 MTB trail.

D1969

D1765, D1767, D1770

D1740, D1813, D1809

D1830, D1829, D1832, D1833

North 313 and Seven Mile Canyon - Mountain Bike focus area

D2379

D2386

D2442, D2437, D2432

D2431 (only part)

Routes on the North Rim of Mineral Canyon:

D1395, D1398

D1394, D1407

D1379, D1378, D1380

D1393, D1361

D1402

Routes overlooking Taylor Canyon (Canyonlands National Park):

Three extend to the rim, we recommend leaving one open.

D1019, D1855SJ

D1026, D5313SJ

Routes near Tusher Canyon (north of 313, near Tusher Canyon South Road)

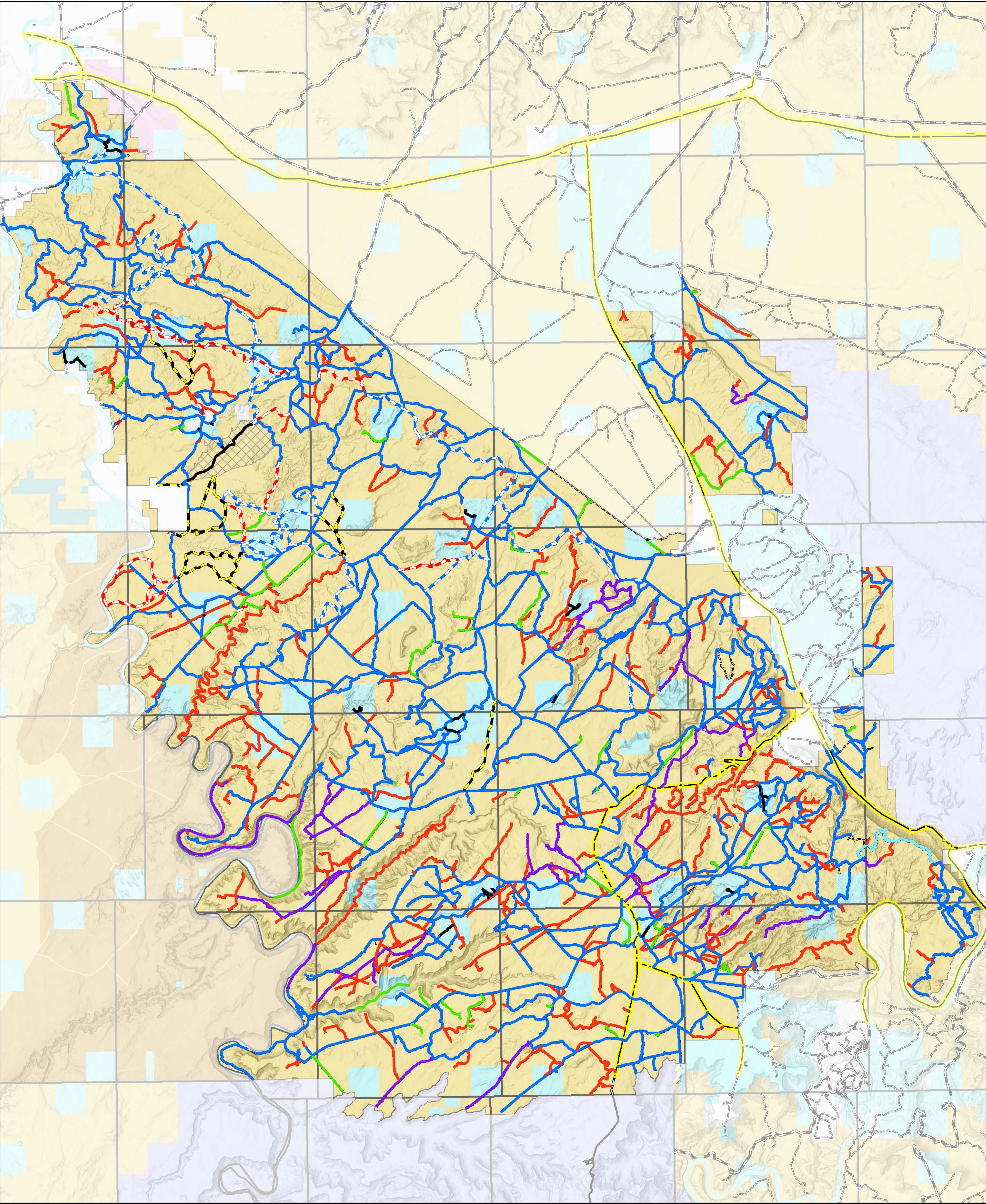
D2478 (only part), D2477

Off Brink Springs Road

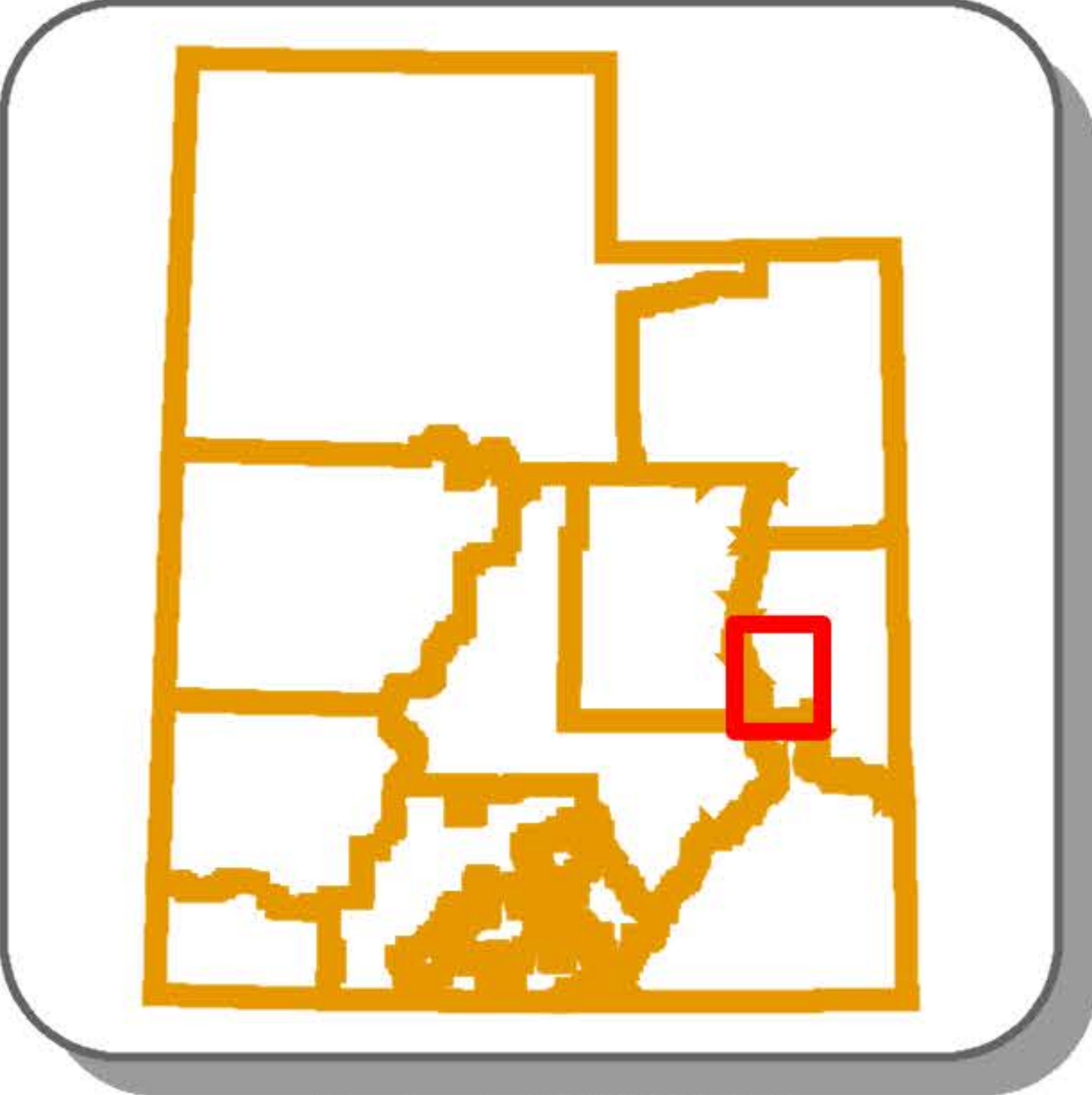
D 2524, D2556, D2557, D2560, D2565, D2566, D2569, D2562, D2561, D2564

Near Arches:

Little dead end spur: D3879, D3881, D3882, D3872 (1.6 miles total for 4 linked routes)



Location Map
Utah BLM Field Office Boundaries



Date: 7/29/2021

Full-Sized Vehicle Transportation Plan Alt B

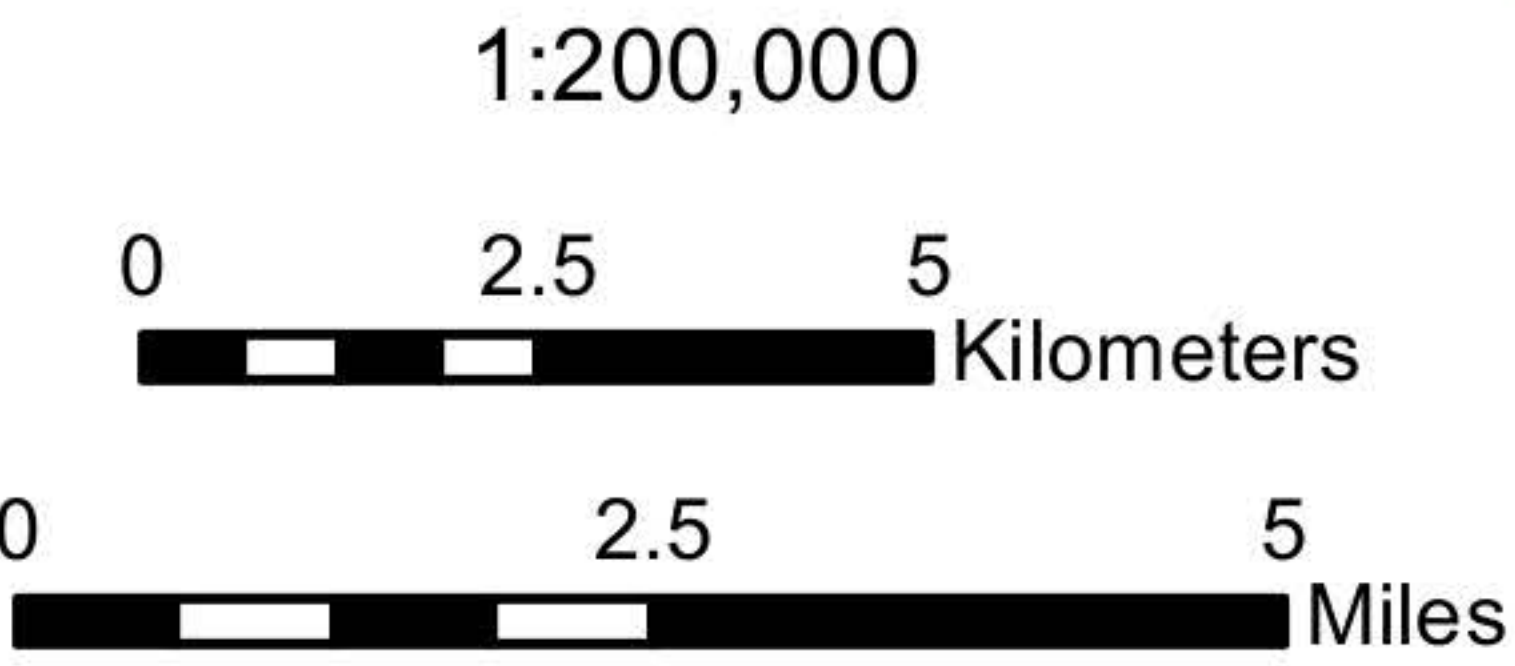
- Open
- Administrative and authorized use only.
- Closed
- Not Assessed (Non-BLM Route)

Motorcycle ATV Transportation plan Alt_B

- Limited to Vehicles Under 50 Inches
- Limited to Motorcycle Only
- Closed
- White Wash Sand Dunes Open OHV Area
- BLM Wilderness Area
- Bureau of Land Management (BLM)
- Military Reservations and Corps of Engineers
- National Park Service (NPS)
- Private
- State
- State Parks and Recreation
- State Wildlife Reserve/Management Area

Grand County Recommendations

- Closures:
- Limited Access:



No warranty is made by the Bureau of Land Management as to the accuracy, reliability, or completeness of these data for individual use or aggregate use with other data.



Ride with Respect
395 McGill Avenue
Moab, UT 84532
435-259-8334
501(c)(3)

December 6th, 2021

Grand County Commission
125 East Center Street
Moab, Utah 84532

Dear Commissioners:

We are increasingly concerned about the commission's input to the BLM regarding the Travel Management Plan (TMP) revision for the Labyrinth Rims planning area. Although the Motorized Trails Committee (MTC) supports the October 19th letter from Ride with Respect (RwR), your latest draft letter was posted just three days ago, so I am speaking only for RwR in this letter.

While both versions of your draft letter merely ask the BLM to analyze closure of some routes, they endorse the closure itself of other routes, and they double down on buffer quotas (arbitrarily requiring "(a) 15% of the planning area be more than one mile from a motorized route, and (b) 30% of the planning area be more than half a mile from a motorized route") that would require closing hundreds of miles of motorized routes within the planning area (in addition to the hundreds of miles of routes within the planning area that were closed in 2008). We're alarmed by the magnitude of the draft letter's demands and the commission's complete lack of outreach to the motorized recreationists and businesses that would be profoundly affected by such sweeping closures.

Along with the Moab Friends For Wheelin' and Red Rock 4-Wheelers, RwR is largely responsible for implementing the current restrictions, and we'd be receptive to identifying the need for further restrictions if not for your draft letter's chilling effect on any collaborative solution. For example, even though Alternative B already proposes closure of Dead Cow Loop, the longer version of your draft letter specifies "We support the closure" (not merely the analysis) of Dead Cow Loop (along with all of Tenmile Wash, Hey Joe Mine Road, Hell Roaring Canyon, Day Canyon Point, and the northeast half of Rusty Nail that Alternative B already proposes for closure and that your draft letter specifies "should be closed"). RwR already blocked off the part of Dead Cow Loop that ran closest to the Green River, and we could work with the BLM to relocate three other parts of the loop further from the river if these constructive, practical solutions weren't sidetracked by Grand County largely echoing the demands of groups seeking to vastly expand the designation of wilderness (which prohibits all mechanized travel including bicycling).

Your draft letter's claim that routes along the Green River have "notorious user conflict issues" is exaggerated, as is your claim about conflicts with "quiet" recreation along Gold Bar Rim and Golden Spike 4WD routes, and your proposal to ban motorcycling and UTV riding on those routes is uncalled for. For one thing, despite the RMP direction to focus on "motorized backcountry touring" in this area, the Magnificent Seven mountain-bike trail system was developed to the extent that mountain biking uses only 1.5 miles of Gold Bar / Golden Spike. For another thing, a motorcycle and UTV ban would baselessly target some vehicles that are relatively quiet (including

electric vehicles and all classes of e-bike) while ignoring some other vehicles that are relatively loud. If the commission insists on reducing user conflicts by banning types of use, then banning non-motorized use of Gold Bar / Golden Spike would be most effective, as we can depend on the motorized uses to share the route so long as basic education and trail maintenance are performed. After all, hundreds of miles of trails around Moab are already reserved exclusively for non-motorized use. However RwR believes it would be far more productive to continue allowing all uses on Gold Bar / Golden Spike, to build a mountain-bike trail adjacent to the 1.5 miles that's currently shared, and to fix your noise ordinance.

The MTC gave you a very effective, pragmatic, and comprehensive set of solutions to the noise issue, one that is stricter than all of the dozen states that have OHV sound standards, but which still provides a path forward for vehicle owners. Granted you've already spent a lot of tax revenue hiring an activist consultant to produce an overzealous noise ordinance that's virtually impossible for (a) thousands of Moab residents and visitors to meet, (b) officers to enforce, and (c) judges to convict. Nevertheless tax revenue from OHV tourism has continued to grow, so you can hire a consultant with a proven track record of fixing ordinances and equipping staff to safely and efficiently enforce it, which would largely eliminate excessive sound on Gold Bar / Golden Spike and all of the other routes where your draft letter identifies noise as a rationale for closure.

In the Labyrinth Rims planning area, the BLM closed several-hundred miles of existing motorized routes in 2008, and now the agency's Alternative B would close hundreds of miles more, including some of the best 4WD routes, ATV trails, and motorized singletrack. Astonishingly both versions of your draft letter criticize Alternative B for not closing nearly enough, and the longer version asks the BLM for more time so Grand County can identify many more routes to propose closing, while in the meantime proposing the first few-dozen closures that come to mind. These proposed closures include (in clockwise fashion):

1. The Salt Valley Overlook that's a couple miles northwest of Klondike Bluffs (which is used for the North Baby Steps mountain-bike route),
2. All of Hidden Canyon Rim, including Mashed Potatoes, Lunar Canyon, and Mean Hill,
3. All of Tusher Canyon, including the spur,
4. Part of Sevenmile Rim, including the spur that overlooks switchbacks of UT-313,
5. The part of Wipeout Hill that goes between Monitor and Merrimac buttes,
6. The 4WD route above the North Fork of Sevenmile Rim (which loops with the Big Mesa part of Wipeout Hill),
7. The only 4WD route that can connect the route in #6 with the upper end of Gemini Bridges Road (which is used for the Seven Up mountain-bike route),
8. Additional 4WD routes that are north of the upper end of Gemini Bridges Road (which are surrounded by the Mustang Loop mountain-bike trail),
9. Four Arches Canyon that's southwest of Crips Hole,
10. The canyon that's due south of Crips Hole,
11. The overlook of Crips Hole and Gemini Bridges (as accessed from Long Canyon Road),
12. Dry Fork Bull Canyon,
13. The southwest half of Rusty Nail (with the northeast half already proposed for closure in Alternative B),
14. Most of Gold Bar Rim and all of Golden Spike (ban motorcycles and UTVs while allowing full-size vehicles),
15. Two overlooks of Taylor Canyon,
16. Hell Roaring Rim from Jewel Tibbets Arch to Mineral Point Road, plus a spur that's west of Jewel Tibbets Arch,

17. Four more miles of Hell Roaring Rim where it's closest to Mineral Canyon, plus 2 overlooks of Mineral Canyon,
18. Hell Roaring Canyon from the north end of Mineral Bottom Airstrip to the mouth of Hell Roaring Canyon (with the rest of Hell Roaring Canyon already proposed for closure in Alternative B),
19. Most of Deadman Point (with the river overlooks already closed in Alternative B),
20. All the 4WD routes between Deadman Point and Spring Canyon Road,
21. The last mile of Spring Canyon Road such that it would end a mile short of the river (with Hey Joe Mine Road already closed in Alternative B).

To illustrate why Grand County shouldn't ask the BLM to spend precious resources analyzing the closure of these routes, consider just a couple of them. First the 4WD route above the North Fork of Sevenmile Rim (#7 above) doesn't need to be used for Seven Up mountain-bike trail because there are spur roads a half-mile west of it that could be linked by constructing one mile of new mountain-bike trail. As spur roads, they receive less motorized use, so mountain bikers wouldn't have to share them very often.

Second, closing two overlooks of Taylor Canyon (#15 above) would actually eliminate all overlooks of Taylor Canyon because Alternative B already closes the third overlook that's furthest west. While Alternative B spares a 4WD route that appears to be a fourth overlook that's furthest east, it actually approaches a tributary of Taylor Canyon named Rough Canyon, and it ends a quarter-mile short of any overlook of Rough Canyon. Currently the BLM allows access to three Taylor Canyon overlooks, each with a different view. Alternative B would close one of those three. The longer version of your draft letter urges Alternative B to close all three, and the shorter version virtually necessitates closing all three to meet the buffer quotas. Why should we analyze making it unfeasible for an elderly person to overlook Taylor Canyon? So someone down in Taylor Canyon with exceptional ears doesn't hear a motor on the rim for a fraction of a minute? Taylor Canyon itself has a road that the NPS permits driving for campers, climbers, etc. Grand County ought to support leaving all three overlooks open for the different views, the people in different walks of life, and the capacity that three overlooks provide while leaving all the other miles of the Taylor Canyon rim non-motorized.

In 2008 limiting motorized travel to designated routes was a huge deal, as it closed the vast majority of acreage to motorized use, and has required stakeholder cooperation to gain compliance. In the current Labyrinth Rims planning area, even though the BLM has chosen to not consider adding a single route, RWR is open to closing more routes. However, considering the hundreds of miles that Alternative B already proposes to close, the BLM doesn't need to put hundreds more on the chopping block. We see no compelling reason for the BLM to analyze closing the additional routes you identified. Nevertheless RWR would take a second look at specific routes and consider all solutions if the commission would start taking a more collaborative and prudent approach.

Sincerely,

A handwritten signature in blue ink that reads "Clif Koontz". The signature is written in a cursive, flowing style.

Clif Koontz
Executive Director