



June 21, 2022

Moab Field Office
Attention: Camping Proposals
82 East Dogwood
Moab, UT 84532

RE: Labyrinth Rims Camping Proposal
DOI-BLM-UT-Y010-2021-0094

Dear Sirs:

Please accept this correspondence as the comments of the above Organizations expressing serious concerns with the Labyrinth Rims SRMA Management Proposal. ORBA is a national not-for-profit trade association of motorized off-road related businesses formed to promote and preserve off-road recreation in an environmentally responsible manner and appreciates the opportunity to provide comments on this issue. United Four-Wheel Drive Associations was formed in 1976 and United Four-Wheel Drive Associations Inc. is the only International Organization that represents you, the 4x4 enthusiast, exclusively. Entirely comprised of fellow enthusiasts, United ("UFWDA") understands the issues that impact your lifestyle. One Voice is a non-profit national association committed to promoting the rights of motorized enthusiasts by improving advocacy in keeping public and private lands open for responsible recreation through strong leadership and collaboration. One Voice was born from the concept of presenting a unified voice for motorized recreation through a national platform representing the diverse OHV community. One Voice represents the many layers of the OHV Industry: from manufacturers, dealers, associations and grass roots organizations, to leaders and representatives of the trade industry. For purposes of these comments ORBA, U4WD and One Voice will be referred to as "the Organizations".

The Organizations are very concerned that the Proposal lacks basic data to create a camping plan that recognizes the value of the resources and setting a plan moving forward for success. While these comments may at points be critical, this is unfortunate but also out of control of the Organizations. We don't enjoy being put in this position and our intent is to clearly and vigorously seek this information in the planning process. These issues are critical to our members, both private and business, but are also

critical to the development of a successful long-term plan for the area. Identifying issues, managing them effectively and moving on must be a priority. The Organizations would like to avoid another planning process in the Moab area, such as what is occurring with the BLM travel planning decisions settled in the Utah Federal District Court in 2017. It is again worth noting that these travel plans were stuck down for many of the same concerns as we raise in these comments. The possibility of two planning efforts being struck down for motorized users in this area is simply unacceptable to the Organizations.

Our members have participated in events in the Moab area for generations and many live in the area as well. The Organizations and our members have been active participants in the King of the Hammers event in the Barstow FO in Southern California for many years. During this event, a city more than twenty times the size of Moab is created in the Southern California desert for a week. The race is held and draws people from all over the globe. At the end of the week, the town is removed and desert returns to the area. We have to ask how this type of effort and success can occur in some areas and other areas continue to struggle with lesser challenges with similar type of resources being available. This type of struggle is highly frustrating to users and partners and addressing the management struggle for the Proposal area should be a goal of the Proposal.

The Organizations and our members have participated in the development of dispersed camping plans throughout the Western United States, such as the current planning effort for the Moon Rocks area in the Carson City BLM FO and efforts in the Badger Flats area of the Pike/San Isabel NF and BLM Royal Gorge FO and Rabbit Valley in the Grand Junction FO. The Organizations recently intervened and successfully defended a challenge to camping access in the Oceano Dunes State SVRA in California against claims of fugitive dust impacts to local communities. Information such as how many visitors and how they were visiting was critical to the successful defense of these claims by land managers. Not only is information critical to an EA but is also highly valuable for reasons that not one can imagine at this time.

The Organizations are aware that a combination of fully dispersed and designated dispersed camping can provide a wide range of opportunities in any recreational area that is hugely valuable to the public. The basic information necessary for this type of discussion is not provided at all in the Proposal. Based on these experiences, there are foundational steps for success that must be addressed in any dispersed camping effort and none of these are addressed in the Proposal. Many of the Organizations concerns are

foundational in nature and are made without regard to any alternative in the Proposal, such as the complete lack of educational materials for the Proposal area.

1a. Stewardship and management are different issues that are not interchangeable.

Prior to addressing our specific concerns with the Proposal, the Organizations must address what has become a systemic failure in the management analysis in the Moab area, as we believe the current Proposal is significantly impacted by these systemic and ongoing failures. Regardless of what management standards are determined to be necessary in the Proposal, we are very concerned that failing to address these underlying management issues will only result in more failure. Offices that address these foundational management concerns seem to have more success in subsequent management and stewardship efforts while other offices continue to struggle.

Our first concern is the fact that management and stewardship are concepts that are used interchangeably in the Proposal. Managers must recognize that these are separate and distinct efforts and processes and while they can be related, they are **not** interchangeable. The failure to identify these differences has resulted in a Proposal blames the public for their failed stewardship efforts without identifying management processes that will create a process that can be successful in the future. Our concern is that most of the processes are currently non-existent or providing inaccurate information to the public if camping type concerns are mentioned at all. An example of this type of failure would be the fact that maps available to the public often don't mention camping restrictions on areas that the public would expect this information would be displayed on. This is exemplified by the fact the BLM Avenza trails map for the Labyrinth Rims/Gemini Bridges, which is a great resource, fails to mention any camping restrictions for the area. This management information is necessary to direct the public stewardship levels in the area.

The Organizations believe an example of the underlying issues the FO must address is reflected in the following situation. On page 2 of the Proposal, the FO states that in 2021 the Proposal was scoped with the Trail Mix group out of the Moab area. We are vexed by the decision making reflected with this, as the Trail Mix group represents only non-motorized usages. Given that the Labyrinth Rims/Gemini Bridges area is specifically identified as a multiple use area, wouldn't scoping include groups representing all interests? In 2019, Grand County has established a Motorized trail committee and BLM has a designated seat on this committee. The State of Utah also has a trails committee and OHV program. These committees and

groups would also represent collaborative tools for scoping of proposals such as this one. Why were these resources not used? These resources have been developed to facilitate these types of scoping and collaboration in an effective and efficient manner.

Another example of the systemic failures of the process would be reflected by the fact that the State of Utah has a very vigorous OHV program that has been providing significant funding to managers across the state for a wide range of issues. A review of the grant awards from the program only identifies two grants to the Moab FO. One was for a mini-excavator and the second was for trailhead improvements at the Poison Spider trailhead, which is outside the Proposal area. This program provides a wide range of funding for educational resources and kiosks and we have to believe would support a grant for development of visitation to the Proposal area. Why would there not be a request for these type of resources from the program by the Field Office? Again, these types of requests have been made by other offices and are very common in OHV programs throughout the country.

NPS has 13 years of site-specific visitation data available to the public for analysis of the White Rim and Elephant Hill projects on Canyonlands NP, which is generally south of the Proposal area. While the Organizations continue to have serious concerns about the result of these efforts the model of analysis used by the NPS warrants comparison and discussion. Does this data warrant discussion in the Proposal? We believe it does as it identifies the number of visitors that may have been displaced by the White Rim/Elephant Hill efforts to the project areas as a result of the 2015 NPS efforts. While the NPS data is easily available, it is not mentioned in the Proposal.

Our concerns with the management process extend beyond educational materials, as data for analysis has not been developed by the Office. Stewardship efforts could assist in acquiring this type of data but this objective must be valued in the management process. Other office that does not have the types of resource that the FO has are able weight this type of management goals. The relationship of the White Rim/Elephant Hill and current effort to each other provides a good example of the systemic issues we are concerned about. The current Proposal is unable to provide any visitation data for the area, despite the concerns about increased visitation creating impacts in the area being voiced in the Moab FO RMP finalized in 2008. Over a smaller time frame the Park Service was able to compile significant data that was highly relevant to the White Rim /Elephant Hill effort.

1b. What can happen when managers function properly with stewards?

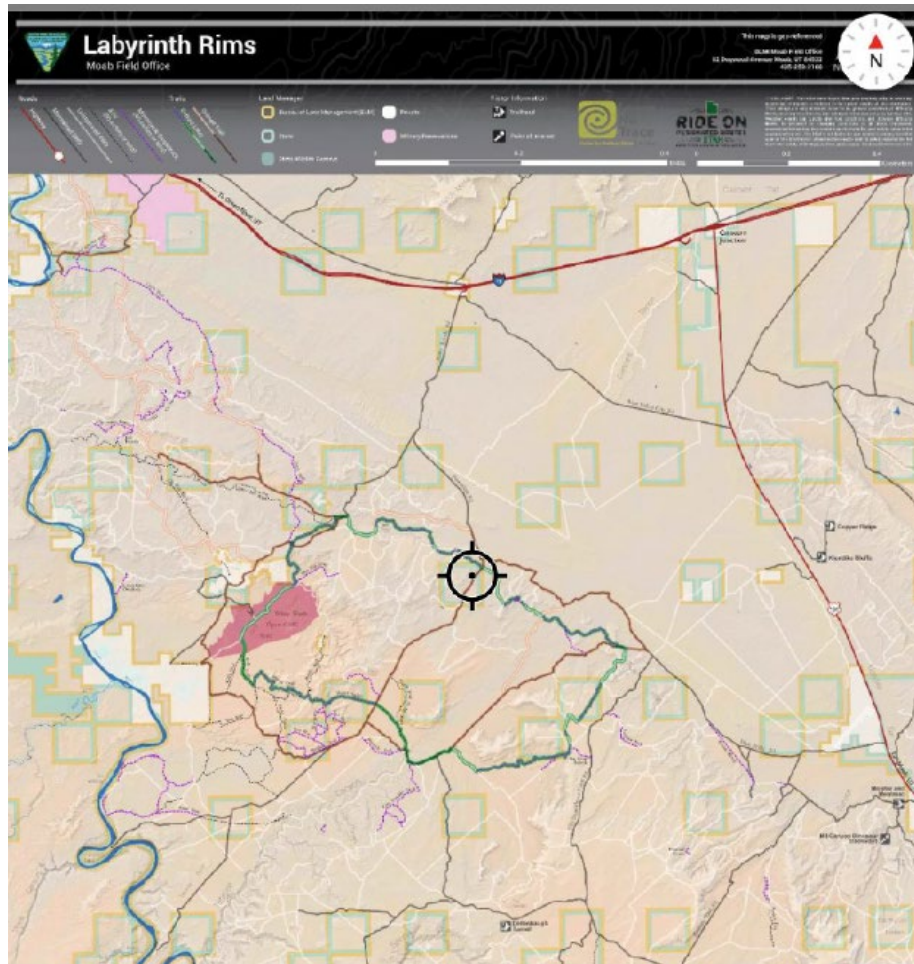
The Organizations would like to highlight the huge success that can result from the understanding of management processes and stewardship. This is exemplified by the success that the Grand Junction FO in Colorado has had as a result of these changes, and these benefits can be very quick. For this portion of our comments, a little general background is needed. In 2015, the GJFO completed a resource and travel management plan that really left relationships with the motorized community broken. At this point, OHV funding had almost ceased to follow into the area. The DENCA was only formed in 2009 and management plan was finalized in 2017.

The transformation of these areas since these efforts were concluded has been significant and has been impacted by many of the same spikes in visitation that the Moab FO has experienced. Partnerships have been restored, huge amounts of money from the OHV program are flowing into the area for a wide range of projects. We have included year end reports to the OHV program of the accomplishments of the OHV funding in these areas as Exhibit “1”. We would note that basic information such as visitation numbers and summaries of resources in the area are prominently displayed in these reports and have been exceptionally helpful in managers making decisions that stewardship partners can assist in implementing. Managers can quantify goals and needs based on data rather than continuing to assert visitation has increased “a lot” and subsequently attempting to develop or manage resources to these vague standards.

2a. Complete failure to educate the public on existing management prescriptions for the area.

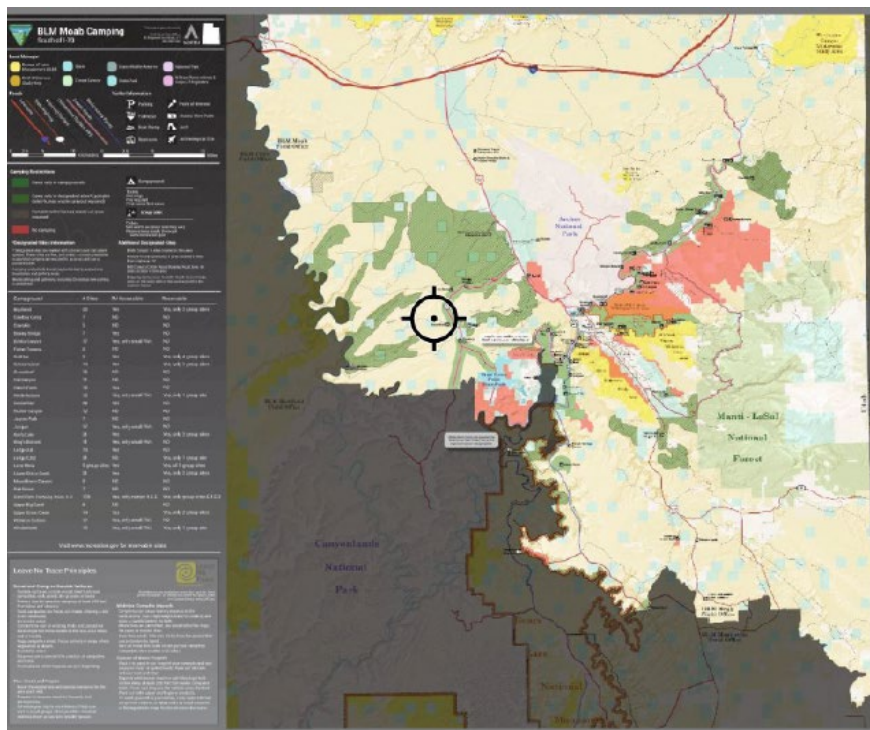
The Organizations must first express a high level of frustration at the exceptionally limited nature of educational materials for camping in the planning area. While we appreciate the concerns about resource impacts in the area, the public will avoid these impacts and follow regulations, if they are aware of what the regulations are. This is a critical failure of current management and the Proposal. The Organizations are not aware of any kiosks or other informational resources in the Proposal area that could provide basic educational resources to the public. Contrary to the GJFO data provided in their annual OHV grants as a normal course of business, the NEPA analysis provided in the Proposal lacks any data about existing educational resources and how they have adapted to address expanding usage of these areas.

The Moab Field Office has developed an Avenza map for free download for the public. This is represented below:



This is a great resource for trails but the Organizations must question why the camping restrictions are not even mentioned on this map. While mine safety standards are mentioned, camping restrictions for the area are not.

Additionally, the BLM also provides the following regional camping map for download on the Avenza mapping platform. The Labyrinth Rims area is identified as designated routes only on the map but again other general guidance on the map is incorrect.



This lack of information generally about the area is a major concern. What is more concerning is the management standard for dispersed camping is as follows:

“Camping and vehicle travel may be limited to posted site boundaries and parking lots.”

This is simply incorrect and creates the expectations motor vehicle usage in the camping sites is allowed or permitted and this expectation would encourage the public to violate camping restrictions in the area. The public simply should not be blamed for not fully understanding the regulations that are applicable as they are not accurately reflecting the current regulations.

This would be a resource the public would normally expect some type of identification of camping in the area on, such as maps of dispersed sights or restrictions regarding limited travel off route to camp. For reasons that remain unclear this opportunity as declined, and again the public should not be blamed for this type of impact. These are issues that simply must be addressed moving forward. If the public is not

provided high quality materials on the management of these areas, they simply cannot comply with any restrictions.

The Proposal must outline how education of the public on current restrictions will be achieved and how new restrictions will be educated as well. The Organizations vigorously assert that high quality educational materials must be developed that accurately reflect existing management and new management restrictions as part of this Proposal. Without these materials, the Organizations must question how any planning effort would be successful. The plan must lay out how accurate information to the public will be provided electronically and on site through resources such as kiosks.

2b. Current dispersed camping usage reflects the public desire for a high-quality recreational experience while dispersed camping.

The Organizations are very concerned that basic information for analysis and public review on how the Proposal is complying with RMP requirements for development of camping resources for motorized users on numerous locations in the SRMA has been complied with. Basic information such as how many vehicles are arriving with and without trailers seeking opportunities on the area are not provided. These RMP requirements are outlined more completely in other portions of these comments, but there are several good reasons for this analysis of this type of standard even without the SRMA designation. Providing high quality opportunities for the public leads to higher levels of self-enforcement of standards in the future as the public is not forced to seek these opportunities out. These general concerns would include:

- a. Camping on a road is a low-quality recreational opportunity. Dispersed campers want at least the perception of solitude. This is not provided by camping close to a road, which can be VERY dusty and noisy if there are other vehicles in the area.
- b. Camping on a road can be unsafe. Dispersed camping often includes small children, bike riding, pets, people loading and unloading vehicles. Interactions with a road are not consistent with these activities and land managers should strive to move camping a small distance away from designated routes to avoid conflicts with usages. This will GREATLY improve the recreational experiences.
- c. This type of basic information might include a brief summary of what types of vehicles are the public seeking opportunities for. Below are several pictures of the wide range of recreational vehicles the public are using to access public lands in the region.



A Single Camper towed via gooseneck or 5th wheel hitch.

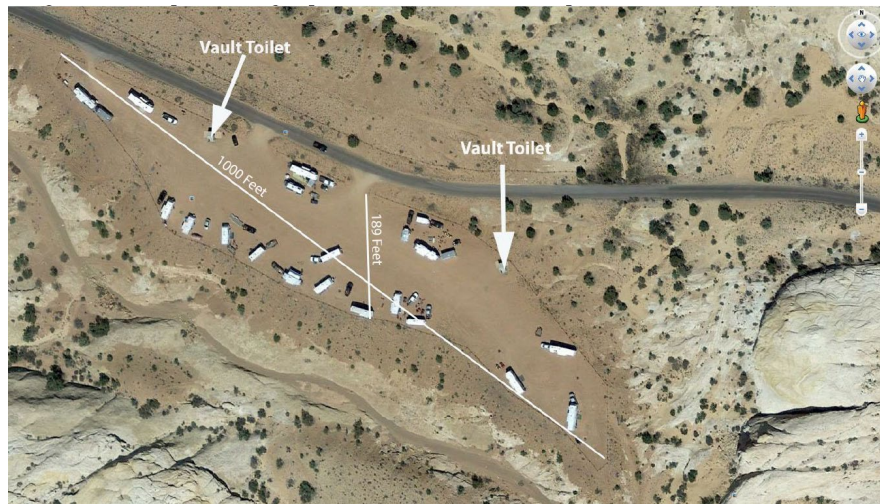


Above are two representations of multiple campers used on a dispersed site



A single bumper tow camper on a dispersed site.

This type of information is critical to the development of a camping plan that provides high quality opportunities and protects resources, as information such as this is critical in allocating resources for sites. The following picture represents how these types of factors can be integrated into the design and layout of large dispersed clusters of campsites around a focal or anchor point, such as a bathroom.



The Organizations must question the basis for the RMP requirement that motor vehicles to remain on trails while camping was established for the area. This is a departure from traditional management standards that have allowed dispersed camping within a certain distance of designated routes.

The Organizations would note that basic information about camping usages is something land managers are normally collecting as a part of business. The following images are selected images from a strategic planning effort concluded on the Divide Ranger District on the Rio Grande NF in Colorado. This information was collected in less and a year and not in response to any NEPA activity. This represents the type of information we would expect to see in an EA. An example of this is as follows:

The Divide Ranger District conducted eight days of recreation patrols between July and September 2021. These patrols catalogued dispersed campsites and tallied vehicle and trailer numbers. The first three days of patrols occurred over the July 4th holiday weekend, and 241 dispersed campsites were mapped. In the following months, patrols in the same locations observed a total of 125 occupied dispersed sites—34 new sites were mapped and 91 sites were documented to have recurrent use.

The eight days of patrols tallied a total of 275 dispersed sites, 622 passenger vehicles, 360 RVs/campers, 230 OHV trailers, and 6 horse trailers. Figure 2 illustrates the proportion of vehicles with trailers, and the ratio of OHV trailers to horse trailers. While these data are not statistically valid, they suggest the type of demand for recreation: RV/camper camping and OHV use.

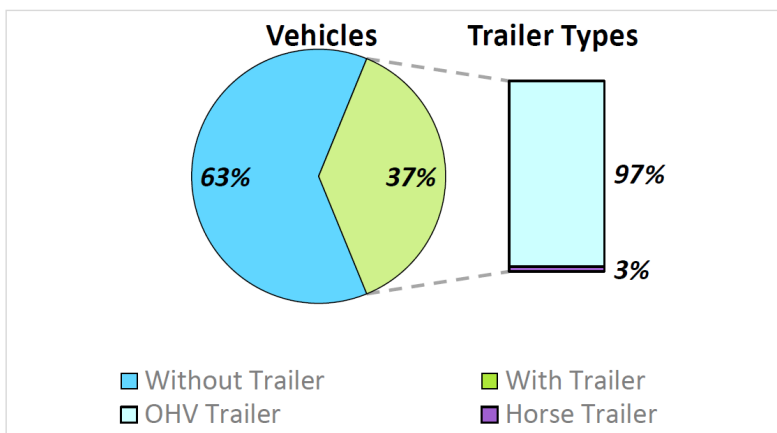


Figure 3: Pie chart shows percentage of vehicles with trailers on the Divide Ranger District; bar chart shows ratio of trailer types observed

In addition to the 275 dispersed sites identified through recreation patrols, 279 dispersed sites were mapped through satellite imagery, with an estimated accuracy of $\geq 70\%$. Additional sites exist on the Divide Ranger District and data gaps have been identified. Adjusting for data gaps and unsurveyed areas, the Divide Ranger District estimates that there more than 700 dispersed campsites on the district. The map in Figure 3 shows how these documented dispersed campsites are distributed. Every road system has dispersed camp sites, with the greatest concentrations near South Fork and Creede. The southwest portion of the Divide Ranger District – the area without roads – is the Weminuche Wilderness Area.

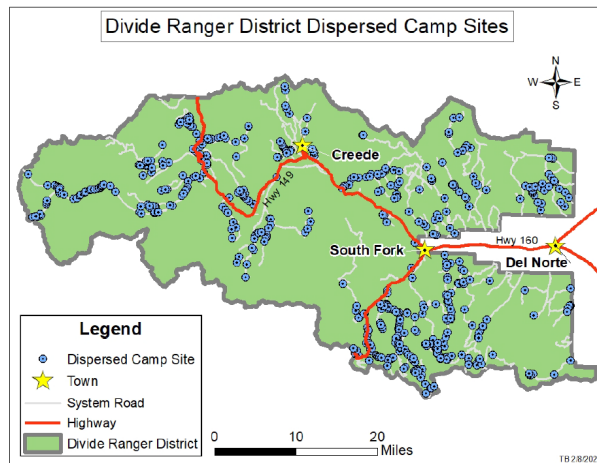


Figure 4: Map of Dispersed Camping Sites on the Divide Ranger District

2.3 Social media and mapping applications

2.3.1 Social media

Location tagging on social media has allowed more people to see the Rio Grande National Forest and learn about the Divide Ranger District's recreational opportunities. Instagram's hashtag feature allows users to share the location of where a photo was taken, and Facebook's check-in feature allows users to share a location that they visited. Social media numbers inform the popularity of places and highlight areas that are trending towards an increase in use. Analysis reveals that Wolf Creek Ski Area, North Clear Creek Falls, Stony Pass, the Bachelor Loop, and Big Meadows Reservoir have a substantial social media presence. Figure 5 provides a snapshot of current popularity for sites around the Divide Ranger District. A comparison between the two platforms' use indicates that both should be monitored for trends in popularity. Trends in social media popularity of more remote or resource sensitive locations is a useful indicator because of the management implications of untracked increases in use. Appendix D contains the January 2022 snapshot of location tags for the district and includes distance from the Divide Ranger District office in Del Norte as a proxy for management logistical burden.

The Organizations have attached a copy of this strategic planning document as Exhibit "2" for your convenience. Again, this is critical information for the public process and development of a camping plan that, for reasons that remain unclear, has not been provided in the EA. Not only is this information critical to the public process but it is also critical to the defense of any decision that should subsequently occur.

2c. Facilities being developed should provide a high-quality recreational experience at all times as required by numerous planning documents for the area.

The Organizations vigorously submit that high quality recreational resources must be the goal of every phase of the effort both now and into the future. Not only is NEPA a legal requirement but it also serves as a major management tool. The Organizations submit there may be alternatives that could be developed in the future to address expanded visitation 10 or 20 years from now, that should be looked at simply to avoid NEPA analysis in the future. Vault style toilets are exactly this type of an example, as there is going to be a need for these in this area in the future. The Organizations believe analysis of possible

locations for the installation of vault toilets in the future as part of the Proposal simply makes good management sense. This type of flexibility would allow managers to adapt to expanded usage or implementation of new regulations in the Proposal and then finding impacts were still occurring. Rather than starting NEPA again, managers could simply move forward with installing vault toilets as the NEPA analysis had already been completed.

There were concerns about human waste removal in the Proposal area. While this impact appears to be a concern, how management success is achieved is never addressed in the Proposal. While the carry it in carry it out model for human waste appears to be plan, we really are not sure it is especially in the heat of Moab in the summer. The Organizations must ask why pit or vault style toilets would not be looked at as a management tool for this issue and we have to believe that if a vault toilet model had been applied in this area 10 years ago, the toilet paper flower issue would have been greatly reduced. The Organizations vigorously assert that pit or vault style toilet is simply superior to the portable chemical toilet for a large number of reasons, such as anticipated longer life span, better user experiences, easier maintenance and the ability to stack services at these locations. For purposes of this section, we are referring to the following type of facilities:



While we are aware that the vault style toilets may have more upfront costs, many of this style toilets are becoming something similar to a prefabricated system. The purchaser does minimal site work and then the vault toilet is simply assembled on site.

The user experience for this type of facility is significantly better as these hardened facilities convey a higher quality recreational experience and this makes users less apt to behave poorly and can indirectly have a significant impact on user behavior in the area. This type of facility also provides managers the ability to work towards a single point of sale type management model. Frequently these types of facilities

are easily visible and serve as a navigation guide for campers coming to designated spots in the vicinity of the toilets. People simply associate this type of resource with designated camp sites. Often, we have had great success in providing other trailhead type facilities around the vault type toilet, as often managers place similarly styled educational kiosks adjacent to the vault buildings. Eventually everyone in the area will be using the facility so this is a prime opportunity to educate users on a wide range of issues, such as wildlife, designated camping guidelines or other tread lightly type materials. This type of leveraging of resources simply is not available with the portable chemical toilets.

It has also been the Organizations experience that often vault style toilets are the basis for high scoring OHV grants if the application is made for these facilities. We have to believe this would be a similar situation around this proposal, and we also believe the collaborative value of putting in high quality recreational resources in partnership with the OHV community cannot be overlooked.

2d. Conflicting messaging for management of the Proposal area with Parks Service efforts on White Rim and Elephant Hill projects is a major concern.

The Organizations cannot overlook the fact that much of the BLM dispersed camping management is directly in conflict with recent messaging from the Parks Service on trail usage and off trail usage. While the BLM was attempting implement standards such as requiring vehicles to stay on trails for camping opportunities, which we submit was destined to fail, the US Park Service was sending exactly the opposite message to users about the White Rim and Elephant Hill areas immediately to the south. US Park service was advising people to pull to the sides of these routes if they were stopping as the routes often were two lane roads rather than a single lane trail. The US Park service was very concerned that people stopping in the trail to eat lunch or camp were creating HUGE obstructions to others using these routes and immense user conflict.

The Organizations are intimately familiar with the confusion of the public when they are in the backcountry about the exact management of the areas. The public often does not know the boundary between USFS, BLM, NPS and State or local lands. As a result, we have found it is critical to have some level of consistent management standards and messaging in areas that this type of confusion can occur in. The consistency was not achieved in this area by land managers rather there was direct conflict in management standards, and as a result there was conflict. The Organizations submit that conflicts such

as these destined the planning area management to failure from the start as NPS efforts on education of users of these areas were significant. In contrast BLM efforts are almost non-existent. The public should not be blamed for this failure.

2e. Visitors were displaced to the Labyrinth Rims area as a result of the Parks Service restricting access to the Elephant Hill Road/ White Rim.

The Proposal makes numerous assertions about spiking visitation to the planning area especially in the last 5 years, but fails to explain any basis for these increases. The Organizations cannot overlook the rapid expansion of usage and would attribute part of this visitation increase to the US Park Service instituting heavy usage restrictions on the White Rim and Elephant Hill areas of Canyonlands NP generally to the south of the current planning area in 2015. This permit system was designed to significantly reduce visitation to the area and provided detailed information on the visitation to these routes, some of which were exceeding capacity for the road. When our representatives met with the NPS staff in Canyonlands about the proposal, there was major concern about people stopping and obstructing travel on the road for a variety of reasons.

The Organizations would point out that the significant restrictions on access to the White Rim and Elephant Hill Road probably displaced users to the current planning area. The Organizations are concerned that these types of issues should have been well known to land managers in the Moab FO and they could have been able to address these issues. They chose not to and the public should not be blamed for this failure.

The Organizations would be remiss if the conflict with the decent amount of visitation information on developing a permit system was not contrasted with the entire void of visitation information in this Proposal. The Organizations have attached the vehicle counters information on a route-by-route basis for the Canyonlands efforts as an Exhibit "3". We will merely note that information like this was very helpful in understanding the challenge and the public ability to address these challenges.

3a. The EA lacks basic information on the recreational activity in the area.

Prior to addressing the Organizations more specific concerns on specific issues in the Proposal, the Organizations believe a brief review of NEPA requirements provided in regulation, various implementation guides and relevant court rulings is warranted to allow for comparison of analysis

provided in the Proposal and the proper standard. The Organizations submit there is enough analysis and alternatives to be addressed in the management of the area, that there are questions around the proper analysis tool being an EA or an EIS. The Organizations believe that the high levels of quality analysis required by either of these planning requirements is needed regardless of the level of NEPA required and frequently this gets lost in the planning process. The Organizations are very concerned that the need to document the cause-and-effect relationship between management changes and impacts that will result is a significant weakness in the Proposal. This simply must be remedied in supplemental works to detail how impacts are related to changes. The Organizations believe meaningfully analyzing this cause-and-effect relationship will result in significant changes to the preferred alternatives proposed in supplemental works.

It is well established that NEPA regulations require planners to provide all information under the following standards:

"... It shall provide full and fair discussion of significant environmental impacts and shall inform decision makers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment.... Statements shall be concise, clear, and to the point, and shall be supported by evidence that the agency has made the necessary environmental analyses.... "¹

The regulations included the development of the Council of Environmental Quality, which expands upon the detailed statement theory for planning purposes.

"You must describe the proposed action and alternatives considered, if any (40 CFR 1508.9(b)) (see sections 6.5, Proposed Action and 6.6, Alternative Development). Illustrations and maps can be used to help describe the proposed action and alternatives."²

These regulations clearly state the need for the quality information being provided as part of this relationship as follows:

"The CEQ regulations require NEPA documents to be "concise, clear, and to the point" (40 CFR 1500.2(b), 1502.4). Analyses must "focus on significant environmental issues and

¹ 40 CFR 1500.1

² BLM Manual H-1790-1 - NATIONAL ENVIRONMENTAL POLICY ACT HANDBOOK – pg. 78.

alternatives” and be useful to the decision-maker and the public (40 CFR 1500.1). Discussions of impacts are to be proportionate to their significance (40 CFR 1502.2(b)).”³

These concerns are summarized in the NEPA regulations which clearly provide the reason for the need for high quality information to be provided in the NEPA process. NEPA regulations provide as follows:

"(b) NEPA procedures must ensure that environmental information is available to public officials and citizens before decisions are made and before actions are taken. *The information must be of high quality. Accurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA.*"⁴

The desire for NEPA analysis to stimulate public involvement and comment as part of federal planning actions is woven throughout the NEPA regulations and the implementation documents that have been created by BLM for NEPA issues. The BLM Planning manual clearly states:

"The CEQ regulations also require that agencies "make diligent efforts to involve the public in preparing and implementing their NEPA procedures" (40 CFR 1506.6(a))."⁵

The Organizations believe a brief summary of the standards that are applied by Courts reviewing agency NEPA analysis is relevant to this discussion as the courts have consistently directly applied the NEPA regulations. Relevant court rulings have concluded the NEPA serves two functions outlined as follows:

" *First, it ensures that agencies take a hard look at the environmental effects of proposed projects. Second, it ensures that relevant information regarding proposed projects is available to members of the public so that they may play a role in the decision making process. Robertson, 490 U.S. at 349, 109 S.Ct. at 1845. For an EIS to serve these functions, it is essential that the EIS not be based on misleading economic assumptions.*"⁶

The Organizations vigorously assert that high quality information on numerous issues has simply never been provided in the Proposal. No attempt has been made to estimate visitation to the planning area has been made. There has been no information provided regarding how many existing undesignated dispersed sites are currently in the area and how many would be designated as a result of the Proposal. Even rough estimates of the number of sites to be designated would have been helpful information for the analysis. This type of information is critical to the success of any designated dispersed camping plan.

³ BLM Manual H-1790-1 - NATIONAL ENVIRONMENTAL POLICY ACT HANDBOOK – pg. 4.

⁴ See, 43 CFR 1500.1(b).

⁵ See, BLM Manual H-1790-1 - NATIONAL ENVIRONMENTAL POLICY ACT HANDBOOK – pg. 2.

⁶ See, Hughes River Watershed Conservancy v. Glickman; (4th Circ 1996) 81 f3d 437 at pg. 442; 42 ERC 1594, 26 Env'tl. L. Rep 21276

The lack of high-quality information has materially impaired the Organizations ability to meaningfully and completely comment on a variety of issues. As previously addressed in these comments, public involvement simply has not been stimulated and a hard look has not been performed.

3b. The Range of alternatives provided is simply insufficient to create a successful long-term plan for the area.

The lack of integration of impacts of changes in management between expected current recreational usage and resources provided under the Proposal is simply lacking despite recreation and economics being identified as priority issues for many of the underlying planning documents. The Organizations believe the failure to tie proposed changes to possible impacts of implementation has resulted in a Proposal being provided for public comment that has many viable options for management not being explored. These numerous basic flaws that are outlined more completely in these comments. The Organizations believe these analysis flaws have resulted in a range of Alternatives being presented that simply bears no rational relationship to the planned usage or benefits that are currently accruing to the local communities from the recreational usage or possible impacts to these communities from these changes. This limited range of options also limit flexibility in the plan and limit the possibility of long-term success in the area.

Providing an accurate and reasonable range of alternatives to the public as part of the NEPA process is a critical component of the NEPA process both from compliance with legal requirements but also used as a tool to focus data acquisition needs, and look at options for the management to ensure there is flexibility in the plan. This type of flexibility is critical to the long-term success of and management plan. The rational decision-making process of NEPA is compromised when agencies consider only a limited range of alternatives to their proposed projects.⁷ When reviewing ranges of alternatives provided in a NEPA analysis, the courts have consistently held:

"The alternative section is 'the heart of the environmental impact statement,' 40 C.F.R. 1502.14; hence, '[t]he existence of a viable but unexamined alternative renders an environmental impact statement inadequate.'" ⁸

When determining if a NEPA effort has provided a satisfactory range of alternatives, Courts have held the proper standard of comparison is to compare t the purpose and intent of the Proposal to the range of Alternatives provided. The courts have consistently held:

“[E]nsure that federal agencies have sufficiently detailed information to decide whether to proceed with an action in light of potential environmental consequences, and [to]

⁷ James Allen; *Does not provide a range of alternatives to satisfy NEPA....NEPA Alternatives Analysis: The Evolving Exclusion of Remote and Speculative Alternatives*; 2005 25 J. Land Resources & Env'tl. L. 287.

⁸ *Citizens for a Better Henderson v. Hodel*, 768 F. 2d 1051, 1057 (9th Cir. 1985).

provide the public with information on the environmental impact of a proposed action and encourage public participation in the development of that information.”⁹

Given the numerous documents, guidelines and entirely viable management options that have been overlooked in the creation of the Proposal, the Organizations believe that these failures have caused a range of alternatives to be presented that are significantly different from the range of alternatives that would have been presented if many priority concerns had been accurately addressed when the original vision for the RMP was created. As examples of viable alternatives not considered: Could vault toilets provide a viable resolution of some of the impacts in the area. That answer is clearly yes and not only is it a viable option, it is the option most commonly used to address this type of issue on other federal planning areas, State and local parks and other recreational facilities. The range of alternatives could also provide analysis of pros and cons of expanding or constricting the number of kiosks or camping sites. These would normally be the basis of any range of alternatives, but this issue is simply not even addressed in the Proposal.

4a(1). The Proposal conflicts with the clearly identified goals of the SRMA in the Moab Field Office Resource Management Plan.

The Moab RMP specifically identifies the Proposal area as a motorized expansion area, but at no point in the EA is this direction and vision for the area even mentioned. The Organizations vigorously assert that based on the RMP guidance the Labyrinth Canyon/Gemini Bridge areas generally are the **most** appropriate area for moto use based on the entire field office and planning area more generally. If not here, where does expansion occur?

The management goals and objectives for the Labyrinth Rim/Gemini Bridges SRMA are generally discussed as follows in the 2008 RMP:

“Compared to Alternative A, the Proposed Plan would be more beneficial to recreation for the reasons discussed under Alternative B: 1) more areas would be managed to reduce resource use conflicts, 2) more facilities would be proposed to accommodate the anticipated increase in recreational use and demand, and 3) more routes would be designated for motorized and mountain biking recreational use to meet the anticipated demand for these activities.”¹⁰

The goals and objectives of the Labyrinth Rims/ Gemini Bridges SMRA in the RMP are specifically identified as follows:

“Potential Future Facilities:

⁹ *Kunzman*, 817 F. 2d at 492; see also *Citizens for a Better Henderson*, 768 F. 2d at 1056.

¹⁰ See, Moab FO RMP FEIS 2008 at pg. 4-221

- Bartlett Campground: camping in this area would be restricted to this campground.
- Big Mesa Campground: camping in this area would be restricted to this campground.
- Blue Hills Road OHV Trailhead.
- Courthouse Rock Campground, camping in this area would be restricted to this campground.
- Cowboy Camp Campground, camping in this area would be restricted to this campground.
- Monitor and Merrimac Bicycle and OHV Trailhead relocation.
- White Wash Sand Dunes OHV Parking and Camping Area.
- Gemini Bridges Parking Area and Trailhead."¹¹

The Proposal must be used as a tool to drive these goals and objectives forward, and this goal is vigorously supported by the Organizations. The Organizations must also note that none of these goals and objectives relate in any way to solitude or quiet recreation in the planning area. In the 2008 Final Environmental impact statement, recreational access for multiple use was highlighted as part of the overall strategy for the FO as follows:

"3.11.2.5 DEMAND FOR FACILITY DEVELOPMENT

In the past 15 years, the MFO has constructed and maintained a variety of recreation infrastructure. However, the present level of facility development is still not sufficient to meet the needs of the recreating public, nor is it sufficient to protect resources from the recreating public. Areas within the Grand ERMA that are receiving heavy visitation and camping use will require facilities such as camping areas, toilets, information kiosks, marked routes and parking areas in the very near future. These areas include the Utah 313 corridor, the area northwest of Moab known as Labyrinth Rims/Gemini Bridges (including Ten Mile Canyon and White Wash Sand Dunes), the Bartlett Wash/Mill/Tusher Canyon areas, Klondike Bluffs, Bar M, areas south of Moab, Utah Rims, and Kane Creek Crossing area.

It is reasonable to expect that, in the next 15 years, recreation facilities construction will continue to be needed, although the pace of construction is expected to lessen. With visitation to BLM administered public lands around Moab continuing to increase (and with the need for additional facilities already extant with the present visitation), facilities to provide for these visitors must keep pace in order to protect the land and to provide for human sanitation. Current use levels continue to produce degradation of resources, and additional facilities are needed to accommodate visitation and stabilize resource values.

¹¹ See, Moab FO RMP FEIS 2008 at pg. 2-23

Examples of demand-driven development include: 1) providing camping facilities where dispersed camping activity exceeds capacity, or 2) providing marked OHV or bike routes when numbers and types of users change so that route marking can maintain public safety and protect resources. In addition, providing for vehicular users often requires building parking lots, trailheads and toilet facilities.”¹²

This strategy for the area cannot be overlooked. Since the finalization of the Moab FO RMP in 2008, BLM has periodically evaluated the RMP. The 2015 Moab Field Office RMP evaluation specifically addresses motorized usage as follows:

“2.8. Recreation and Travel Management Visitation has increased dramatically – especially motorized use – in the Moab Field Office since the RMP was completed in 2008. To address the increased pressure on existing areas, travel management and resource protection measures are being implemented at an enhanced rate, when staffing allows. Construction of recreation facilities such as campgrounds, trailheads and trails is a priority.”¹³

The 2015 Moab FO conclusion is hugely relevant as the Proposal area is the most logical place for this type of expansion and development to occur within the FO. We submit that expansion of access must be looked at for the area and large-scale closures of motorized routes in the area would be in direct conflict with the RMP, subsequent evaluations of the effectiveness of the RMP and must be avoided.

4(a)(2). Foundational conflicts with the RMP are not addressed in the Proposal.

As the Organizations have noted throughout these comments, we have major concerns with the alignment of the Proposal with existing resources. Some of these conflicts are so foundational as to render the entire Proposal moot as a matter of law or hugely premature at best. These are the types of issues that simply must be resolved prior to any planning effort.

¹² See, Moab Field Office 2008 RMP FEIS at pg. 3-90.

¹³ See, Moab FO RMP Evaluation September 2015 at pg. 7.

A primary problem with foundational analysis entirely lacking in the Proposal is provided by the following conflicting provisions in the RMP. In the final RMP the following provisions were included to clarify the process for dispersed camping as follows:

“3. The Proposed Plan did not explain the process for providing for parking for dispersed camping. The Approved RMP has been clarified by specifying that parking for dispersed camping will be considered as part of implementation of the Travel Plan (see Management Decision TRV-6).”¹⁴

The RMP provides the following description of the TRV-6 management standard:

“OHV access for game retrieval, antler collection and dispersed camping will only be allowed on designated routes (designated routes/spurs and have been identified specifically for dispersed camping; parking areas associated with dispersed campsites will be marked during travel plan implementation). Adherence to the Travel Plan is required for all activities, except where otherwise explicitly permitted.”¹⁵

For starters, these provisions do not clarify this issue but rather create a “Which came first the chicken and the egg situation” as we have no idea how travel management can occur without designated campsites and we have no idea how you designate campsites anywhere but on the existing routes without a travel plan. If this was going to occur this would have to be assumed to be precluding subsequent additions of off-trail campsites being designated or that any campsites would permanently prohibit motorized access. As a successful travel management has not occurred subsequent to the adoption of the RMP we are forced to assume that any campsites not on a designated route would be closed or significantly restricted as part of the designated camping plan. The Organizations are unable to identify any travel planning process that has addressed camping access, so we were forced to assume the camping planning effort could provide this access. After further review the camping planning efforts did not address this access at all. That is a problem that must be remedied.

This situation is further confused by the following provisions of the RMP:

“The Approved RMP identifies that specific designated routes may be modified through subsequent implementation planning and project planning on a case-by-case basis and

¹⁴ See, RMP at pg. 21.

¹⁵ See, RMP at pg. 127.

based on site specific analysis in conformance with the National Environmental Policy Act.”¹⁶

The myriad of problems these provisions create is simply astonishing, and rather than clarifying provisions, these amendments do nothing but create confusion and questions. Not only does this create confusion in applying the RMP, this creates significant confusion on the scope of the effort as every camping plan we have participated in allows analysis of access to campsites being designated. That is clearly not the case in the current Proposal.

Question #1a. While these provisions clearly speak to future travel planning, the RMP did move to designated routes for a huge portion of the planning area and this is clearly travel management. While the provisions appear to be looking towards future travel planning, is the existing travel plan sufficient? We don't know.

Question #1b. If access to camp sites is currently not provided TMP are these sites to be closed in the camping plan? If there are guidance standards for access to off trail campsites, what are they and how were they created?

Question #2. Is TRV6 only applicable to OHVs and not motor vehicles? This is a major concern as if this is the way this provision is being interpreted it would be highly relevant as most of the public is camping with motor vehicles and not OHVs. Highly relevant information that is not provided but highly critical. We simply don't have the answer to this.

RMP provides following definition of OHVs

“Off-Highway Vehicle (OHV): Any motorized vehicle capable of, or designed for, travel on or immediately over land, water, or other natural terrain, excluding: (1) any nonamphibious registered motorboat; (2) any military, fire, emergency, or law enforcement vehicle while being used for emergency purposes; (3) any vehicle whose use is expressly authorized by the authorized officer, or otherwise officially approved; (4) vehicles in official use; and (5) any combat or combat support vehicle when used in times of national defense emergencies.”

¹⁶ See, RMP at pg. 20.

While the RMP does not define motor vehicle, national BLM regulations provide a very broad definition of these vehicles as follows:

*“Motor vehicle means any vehicle that is self-propelled.”*¹⁷

While this distinction might be easily overlooked in the EA, the implications simply could not be more significant. Travel management applies to all motor vehicles, while TRV6 clearly only applies to OHVs. Again, these questions are never addressed in the Proposal.

Question #3. Is the intent of the Proposal to do a travel management plan and camping plan for the area? If so, it is not identified as such in the scoping or EA. This is again a major problem that remains unanswered or even analyzed in the Proposal.

Question #4. Are all dispersed campsites without current legal motorized access going to be closed? Again, this assumption is not addressed or analyzed in the Proposal.

Question #5. Are all designated dispersed sites only going to be provided walk in type access without motor vehicles? This is not addressed and would be vigorously opposed by the Organizations as this would be an exceptionally poor recreational opportunity and not in any way be related to the visitation to the area currently.

Question #6a. What is the proper process for addressing dispersed camping access issues? The draft TMP process for the area currently under development clearly states that dispersed camping is outside the scope of that effort.¹⁸ This is merely another version of the chicken or the egg situation and presents the situation of if these spur type routes to dispersed campsites were outside the travel planning process, how were these spur routes addressed as the TMP maps do not seem to have any information on spur routes at all. It appears they may not have been inventoried at all.

Question 6b. The draft TMP for the area also identifies many dispersed camping sites as damage points for travel planning efforts. Not only does this decision artificially create an inaccurate picture for the travel

¹⁷ See, 43 CFR § 6301.5

¹⁸ See, TMP scoping report August 2021 at pg. 3.

process, it also creates the assumption that these routes and sites should be closed. How will this conflict be resolved in both planning processes? An example of this situation is provided by the picture in damage report from TMP inventory: ¹⁹



The damage report then provides the following summary of the area:

“Linear Extent

100 - 200 ft, Continues beyond LOS

Comments

Up to 1/4 mile...

Type of Motor Vehicle

Full Sized Vehicle

Purpose of Damage

Short Spur, Dispersed Camping...

Additional Comments

Long spur with dispersed campsites”

The host of problems that the lack of management clarity in the RMP has created in the TMP/Camping process is simply overwhelming for both the camping management plan and travel plan. These problems start with the fact that Wilderness Characteristics are allegedly impaired by camping but motorized usage of WCA areas is specifically allowed in the RMP.²⁰ The Organizations must now ask questions regarding how camping was found to be a damage point when there was no camping plan in place and how will these damage points be addressed in the travel plan if these sites are subsequently designated as legal in the camping plan.

¹⁹ See, Indian Creek TMA_OID154

²⁰ See, RMP: Wilderness Characteristics Area management standard WC-1 at 87.

The list of questions above is only initial as we must wonder how this situation will impact other analysis that has not been provided as well, such as economic impacts from the Proposal.

4b. Economic analysis of possible impacts is simply never provided at all.

The Proposal asserts to be in compliance with the RMP and local planning efforts, which all recognize the value of recreation to the local economy and that the benefits of these activities must be protected and preserved. We believe this is insufficient based on the field office plan and local governmental planning efforts. The basic mandate to include documented economic analysis early in the interdisciplinary team process for public lands planning is provided by the Federal Lands Planning and Management Act ("FLPMA"). FLPMA specifies the various criteria that must be incorporated at specific times in the development of a land use plan as follows:

"(c) In the development and revision of land use plans, the Secretary shall—
(2) use a systematic interdisciplinary approach to achieve integrated consideration of physical, biological, economic, and other sciences;" ²¹

The basic mandate of FLPMA regarding the critical need for documented economic analysis is more specifically and extensively addressed in Appendix D of the BLM's Land Use Planning Handbook. Appendix D opens as follows:

"A. The Planning Process

To be effective, social scientific data and methods should be integrated into the entire planning process, from preparing the pre-plan to implementation and monitoring. The main social science activities for the various planning steps are outlined in Table D-1.

Table D-1.—*Social science activities in land use planning*

Planning steps

Steps 1 & 2—Identify Issues and Develop Planning Criteria

Step 3—Inventory Data

Steps 4—Analyze Management Situation

Social science activities

- Identify publics and strategies to reach them
- Identify social and economic issues
- Identify social and economic planning criteria
- Identify inventory methods
- Collect necessary social and economic data
- Conduct social and economic assessment, including existing

²¹ 43 U.S.C. §1712

	conditions and trends and the impacts of continuing current management
Step 5—Formulate Alternatives	<ul style="list-style-type: none"> ▪ Document assessment methods in an appendix or technical supplement ▪ Identify social and economic opportunities and constraints to help formulate alternatives
Step 6—Estimate Effects of Alternatives	<ul style="list-style-type: none"> ▪ Identify analysis methods ▪ Analyze the social and economic effects of the alternatives ▪ Document impact analysis methods in an appendix or technical supplement ▪ Assess mitigation opportunities to enhance alternatives' positive effects and minimize their negative effects
Steps 7 & 8—Identify Preferred Alternative and Finalize Plan	<ul style="list-style-type: none"> ▪ Identify potential social and economic factors to help select the preferred alternative
Step 9—Monitor and Evaluate	<ul style="list-style-type: none"> ▪ Track social and economic indicators"²²

The Organizations must note that economic concerns are the only factor that is addressed in every step of the planning process laid out in the BLM planning handbook. Documentation of economic forecasts and analysis methodology are required in two separate stages before release of draft alternatives. The required documentation of these concerns is exactly the information the Organizations are seeking to review but are unable to as this information is not provided, nor is any related information provided either. While the critical nature of economic contributions in the planning process is specifically identified, these mandates were simply not followed or even addressed in the creation of the Proposal. This is a concern.

4c. Western Governors Association has identified accurate economic information in the planning process as a major key to successful planning.

The proper integration of accurate economic information is often a weakness of the public lands planning process, which has resulted in the creation of many other longer-term problems when decisions reflecting an imbalanced multiple uses are implemented. This concern was recently identified as a major planning

²² See, BLM LUP Handbook H-1601-1 at Appendix D pg. 2.

issue in the Western Governors' Association released its *Get Out West* report in conjunction with its economic impact study of recreation on public lands in the Western United States which specifically identified that proper valuation is a significant management concern as follows:

"Several managers stated that one of the biggest challenges they face is "the undervaluation of outdoor recreation" relative to other land uses."²³

The *Get Out West* report from the Western Governors' Association also highlighted how critical proper valuation of recreation is to the development of good management plans based on multiple use principals. The *Get Out West* report specifically found:

"Good planning not only results in better recreation opportunities, it also helps address and avoid major management challenges – such as limited funding, changing recreation types, user conflicts, and degradation of the assets. Managers with the most successfully managed recreation assets emphasized that they planned early and often. They assessed their opportunities and constraints, prioritized their assets, and defined visions."²⁴

The Organizations believe our concerns regarding the Proposal and those expressed in the Western Governor's *Get Out West* report virtually mirror each other. This concern must be addressed prior to finalization of the Proposal in order to avoid increases to many other management issues that were sought to be minimized.

5. 12 questions have nothing to do with recreational usages and creating a good plan for the area moving forward.

The Organizations are very concerned that none of the 12 questions created to guide analysis provide any discussion of a reason to maintain access to the area, or benefits from various levels of access to the Labyrinth Rims area. This is highly prejudicial as appears to have decided there are impacts, but fails to discuss what the impacts are in any detail. Additionally, these questions provide no discussion of the goals and objectives provided for the Labyrinth Rims SRMA in the RMP. Again, this would be highly relevant

²³ See, Western Governors Association; *Get out West Report; Managing the Regions Recreational Assets*; June 2012 at pg. 3.

²⁴ *Get Out West Report* at pg. 5.

information for the development of an RMP and clearly could have guided several of these questions in a far different direction.

6. Comparisons of the Proposal to other EA for dispersed camping.

As previously mentioned, the Organizations have participated in NEPA analysis of several dispersed to designated camping projects throughout the western US. When compared to these other efforts, the current Proposal falls woefully short of information that is consistently provided in these other proposals. This type of information would include current visitation estimates, estimates of the current numbers of dispersed sites, estimates of the number of sites to be designated, possible trailhead developments and other information.

The insufficiency of the current proposal is exemplified by the quick comparison to the Carson City FO proposal to manage dispersed camping in the Moon Rocks area which covered 51 pages plus various appendix. The USFS planning efforts on the South Platte Ranger District for the Badger Flats area covered 115 pages plus appendix. The Royal Gorge FO dispersed camping plan for the areas around Salida CO, which has been soundly criticized by all interests, covers a similar number of pages but provides far more detail. By comparison the current proposal is 41 without any appendix or basic information such as visitation and recommendations for the number of designated sites in the area. While this is not dispositive of the issues or concerns, this is a serious indication that there are problems with the level of analysis in the Proposal. This simply must be fixed.

7. Concerns over 2020 usages may be premature and fail to provide an accurate management situation.

The Organizations are also concerned that there may be an unnecessary urgency being provided in the Proposal regarding the increase usage of the planning area. While the Organizations support the proposition that visitation to the planning area will continue to increase over time but also believe that this is another area where better information would be exceptionally helpful. Our experiences have led us to some conflicting conclusions, such as visitation may actually be declining in many areas when compared to 2020 or 2021 levels. This type of detail would again be critically helpful but is not provided despite maintaining recreational resources in the area being a priority of the SRMA.

The EA outlines visitation concerns as follows:

“Visitation to the MFO has increased over the last ten years, and dispersed camping pressures have increased commensurately as have the resource impacts, particularly in the last five years.”²⁵

In our discussions with land managers around visitation spikes on public lands and in these discussions, we have been informed that 2020 usages increased 100-400% in many locations. These new users were complete novices which created huge management challenges that most offices were wholly unprepared to address or meaningfully respond to. Many times, our education efforts targeted the fact you may not have cell service in the backcountry or trailhead. Our experiences with these users also highlighted unusual impacts from well-intentioned messaging, such as messaging about “recreate responsibly”. As a result of this type of messaging we found that the public was using huge amounts of Clorox wipes to protect themselves in vault toilets. These users then threw the Clorox wipes into the toilet. This created a huge problem for managers and partners in removing them as they did not break down. Given these types of challenges we must display significant concerns about the basis of any planning based on these issues.

Our concerns about these visitation spikes for the development of planning is the fact that 2021 visitation returned to about a 30% increase in visitation compared to 2019. Antidotal information from 2022 appears to be indicating that visitation is returning to a more normal level of visitation and may actually be a little below average.

8. Wildlife management standards are often incorrect and inaccurately summarized.

The Organizations are very concerned that many of the wildlife management standards proposed in the plan are overly cautious, entirely incorrect or poor summaries of existing standards. The Organizations vigorously support the wildlife concerns raised in the comments submitted by Ride with Respect, Trail Preservation Alliance, COHVCO and CORE in response to this request for comment. These concerns are not submitted here simply to avoid repetition of information submission.

9. Conclusion.

²⁵ See, Proposal at pg. 1.

The Organizations are very concerned that the Proposal lacks basic data to create a camping plan that recognizes the value of the resources and setting a plan moving forward for success. While these comments may at points be critical, this is unfortunate but also out of control of the Organizations. The analysis provided simply avoids very viable options for the management of the areas and we have to think this is a result of the lack of analysis and detail in the Proposal. We don't enjoy being put in this position and our intent is to clearly and vigorously seek this information in the planning process. These issues are critical to our members, both private and business, but are also critical to the development of a successful long-term plan for the area. Identifying issues, managing them effectively and moving on must be a priority. The Organizations would like to avoid another planning process in the Moab area, such as what is occurring with the BLM travel planning decisions settled in the Utah Federal District Court in 2017. It is again worth noting that these travel plans were struck down for many of the same concerns as we raise in these comments. The possibility of two planning efforts being struck down for motorized users in this area is simply unacceptable to the Organizations.

Our members have participated in events in the Moab area for generations and many live in the area as well. This experience has provided a well of information on successful efforts and less than successful efforts and this causes significant concerns for us on the Proposal. The Organizations and our members have been active participants in the King of the Hammers event in the Barstow FO in Southern California for many years. During this event, a city more than twenty times the size of Moab is created in the Southern California desert for a week. The race is held and draws people from all over the globe. At the end of the week, the town is removed and desert returns to the area. We have to ask how this type of effort and success can occur in some areas and other areas continue to struggle with lesser challenges with similar type of resources being available. This type of struggle is highly frustrating to users and partners and addressing the management struggle for the Proposal area should be a goal of the Proposal.

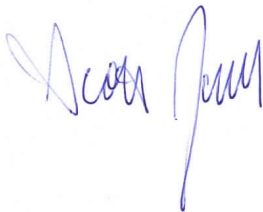
The Organizations and our members have participated in the development of dispersed camping plans throughout the Western United States, such as the current planning effort for the Moon Rocks area in the Carson City BLM FO and efforts in the Badger Flats area of the Pike/San Isabel NF and BLM Royal Gorge FO and Rabbit Valley in the Grand Junction FO. The Organizations recently intervened and successfully defended a challenge to camping access in the Oceano Dunes State SVRA in California against claims of fugitive dust impacts to local communities. Information such as how many visitors and how they were

visiting was critical to the successful defense of these claims by land managers. Not only is information critical to an EA but is also highly valuable for reasons that not one can imagine at this time.

The Organizations are aware that a combination of fully dispersed and designated dispersed camping can provide a wide range of opportunities in any recreational area that is hugely valuable to the public. The basic information necessary for this type of discussion is not provided at all in the Proposal. Based on these experiences, there are foundational steps for success that must be addressed in any dispersed camping effort and none of these are addressed in the Proposal. Many of the Organizations concerns are foundational in nature and are made without regard to any alternative in the Proposal, such as the complete lack of educational materials for the Proposal area.

If you have questions, please feel free to contact either Fred Wiley, ORBA's President and CEO at 1701 Westwind Drive #108, Bakersfield, CA. Mr. Wiley's phone is 661-323-1464 and his email is fwiley@orba.biz. You may also contact Scott Jones, Esq. at (518) 281-5810 and his email is scott.jones46@yahoo.com.

Respectfully Submitted,



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