

October 21st, 2022

BLM Moab Field Office
Attn: Labyrinth/Gemini Bridges
Travel Management
82 East Dogwood
Moab, UT 84532

Re: Labyrinth Rims/Gemini Bridges Travel Management Plan
EA #DOI-BLM-UT-Y010-2020-0097-EA

Exhibit "11" - Letters from Local OHV Groups

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, 2021

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

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October 19th, 2021

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

Dear Mary:

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

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

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

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

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

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

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

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

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

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

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

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

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

3. "Protecting wildlife habitat."

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

4. "Protecting cultural resources."

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

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

Sincerely,

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

Clif Koontz
Executive Director



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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,



Clif Koontz
Executive Director



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2021 Year In Review

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Labyrinth Rims / Gemini Bridges TMP

A 2016 settlement agreement requires the BLM to reevaluate its 2008 travel management plans (TMPs) [in a dozen areas](#) (see the colored areas in the southeast half of the state). One is Labyrinth Rims / Gemini Bridges that spans from Moab to Green River and includes many iconic 4WD and motorcycle trails. Along with MFFW and RR4W, RWR has spent thousands of hours in Labyrinth Rims working with the BLM to implement and refine its TMP, which closed half of the existing routes in 2008. The settlement agreement allows the BLM to add routes, but the Moab Field Office chose to only consider subtracting routes in order to meet the deadline in May of 2023, after which point they'll consider adding routes on a case-by-case basis. Representing RWR along with the TPA and COHVCO, Balance Resources submitted thorough scoping comments (see attachment "2021-04-26 RWR TPA COHVCO Labyrinth Rims").

Using its Cooperating Agency status with the BLM to comment prior to the public, the Grand County Commission essentially urged the BLM to analyze closing half of the remaining half of motorized trails (i.e. close three quarters of the routes that were open prior to 2008), demanding a buffer quota (15% of the area to be a mile away from any motorized route and 30% of the area to be a half-mile away) and specifying that none of the BLM's preliminary alternatives close nearly enough routes. They listed a few-dozen routes to be among the additional ones that should be analyzed for closure, and recommended closing (not just analyzing) all of the Dead Cow motorcycle loop, Tenmile Wash, Hey Joe Mine, Hell Roaring Canyon, Day Canyon Point, Rusty Nail, and Gold Bar Rim / Golden Spike (although Gold Bar Rim / Golden Spike would still be open to full-size vehicles). Their primary justification was to reduce conflicts with non-motorized recreation (including wilderness-quality experiences), which is a legitimate concern, but simply doesn't require closing hundreds of miles of routes (especially if the county would fix its noise ordinance so they can start enforcing it). They also cited the health of bighorn sheep, which is vitally important, but any more than a few new closures will make it much harder for RWR and others to assist the BLM in keeping riders and drivers off the trails that have already been closed. The best way to help sheep would be to work together to gain compliance with the current TMP and to refine it more carefully.

RWR elaborated on these points in its third Labyrinth Rims letter to the commission before their December 7th meeting (see attachment "2021 RWR Labyrinth Rims TMP corr w Grand County" that includes maps of the BLM preliminary alternatives, which can also be found on [the BLM's page for Labyrinth planning](#)). The [commission's deliberation](#), covered many points, some that were entirely valid, others that indicated a perplexing mentality. Commissioner Stock stated "The "no net loss" rhetoric that's coming from special interest groups like Ride with Respect and others who are off-road enthusiasts, it really isn't going to fly moving into the future. We have more and more users on our public lands. And also there are bigger impacts that go beyond user conflicts. And one of those impacts is the continued aridification of the desert coupled with increasing motorized use even on trails is kicking up so much dust that it's landing on our snow in the mountains and melting our water supply earlier and earlier every year." First of all, "no net loss" isn't rhetoric, it's a policy position. Second, RWR never suggested "no net loss" for the Labyrinth Rims TMP. The Motorized Trail Committee suggested it in response to the commission's request for ideas to develop a public lands bill, which is likely to provide preservationists with the certainty of wilderness designation, so "no net loss" could provide OHV riders with a degree of certainty while providing

managers with ample flexibility (see attachment "2021-11-11 MTC Grand County Public-Lands Bill"). Third, RwR is a "special interest group" like any other stakeholder of public lands, but we haven't heard Commissioner Stock use this term to describe horseback riders or others. It's particularly striking because RwR and other OHV groups have performed more service work in Labyrinth Rims than any other nonprofits, work that benefited the land and other stakeholders as much as it benefited the special interest of off-roaders. Fourth, this work prevents off-trail travel in order to promote soil stabilization on the 99% of public lands that's not a trail, which is probably the most effective way to reduce dust caused by OHVs.

Commissioner McGann echoed the dust concerns when stating "When you look at that map, there's a road almost everywhere. Until you look at how many roads are in this area, it's hard to fathom. And it reminds me a little bit of the debate on responsible gun ownership. You know it's like you have that group that is like there is no compromise. We will not change anything because you are taking away. And I can't look at it that way. I need to look at it in a holistic way, like when we talked about the need to look at what's happening with the dust. That is crucial. It has nothing to do with the roads, in a sense, but it does. Global warming and protecting our--the letter we sent saying we support keeping so much land in wilderness, and protecting it is protecting our environment, is taking care of our future generations. And I think when you're elected to an office, your job is not just to listen to what the public wants. That is an important, big part of our job. But our job is also to look beyond that, and look at what our future holds, and study and find ways that we can protect, and make sure that the generations beyond us has some type of water, that they can live here, so they can ride on the roads. If we destroy our water system, that's not going to happen." That's a good articulation of a great goal, but let's determine the extent to which proper use of OHVs is compromising our water before closing so many routes. Before labeling us as uncompromising, realize the enormous compromises already made and additional ones that we're open to, probably against our better judgement. If you can't fathom how many roads there are when looking at a map, it's probably because you're not fathoming how much area the map represents. If the routes were drawn to scale, they wouldn't be visible on the map. Better yet, look on the ground at all of the area between the designated routes, including hundreds of miles of routes that RwR and others helped to close.

Commissioner Walker promoted the buffer quotas when stating "30% would be more than half a mile from a trail. I think that's pretty reasonable, and I think, Clif was pointing out that, if we go with that, that's going to mean closing a lot of trails. We don't start with the present trail network and then that tells us what a fair allocation is." RwR hasn't suggested that the fair allocation is whatever the present trail network may be. In fact, after the 2008 TMP closed half the routes, RwR suggested another closure of a road along the Green. The BLM and local government agreed and, after NEPA approval, RwR blocked off the road. We'd probably support closing another road along the Green if the commission would stop trying to close every single one of them. Likewise we'd support closing routes to expand a non-motorized focus area if the commission would stop trying to close so many hundreds of miles in Labyrinth Rims or to meet arbitrary quotas. Additional statements from Commissioner Walker and the commission's December 7th letter makes clear that they wanted to list even more routes that should be analyzed for closure on top of those in Alternative B. No one has bothered to quantify the preliminary alternatives, so here are the approximate totals:

- ~2,000 miles of existing routes open prior to 2008
- 938 miles open in A (the "no action" alternative)
- 574 open in B (although the BLM plans to reduce this figure in response to the commission)
- 775 open in C
- 885 open in D

Of that ~2,000 miles, RwR mapped ~200 miles twenty years ago, and Grand County's road department mapped the rest. The road department was funded by the state, but they also received enormous help from MFFW- and RR4W-member Ber Knight, who [passed away two weeks ago](#). Ber was a great guy who inspires us to keep working, and keep recreating responsibly, not to make "user conflict" a self-fulfilling prophecy by perceiving others as user types instead of the individuals that they are. The increased use calls on us to follow the "golden rule" and extend basic courtesy to other people, plants, and even the cows that browse on them.

October 3rd, 2022

Jacques Hadler, Chair
Grand County Commission
125 East Center Street
Moab, Utah 84532

Dear Commissioner Hadler:

The Motorized Trails Committee (MTC) would like to follow up with the Commission about the BLM's Labyrinth Rims/Gemini Bridges Travel Management Plan (TMP).

Last November, the MTC let you know that we support Ride with Respect's 10/19/2021 letter regarding the TMP (see pages 23 - 25 of this document), which expressed concern about the Commission's 10/19/2021 draft letter (pages 14 - 22). Likewise, the MTC supports Ride with Respect's 12/6/2021 letter regarding the TMP (pages 35 - 37), which expressed concern about the Commission's 12/7/2021 draft letter (pages 29 - 34). Finally, the MTC supports the "Labyrinth Rims / Gemini Bridges TMP" section of Ride with Respect's 2021 Year In Review (pages 38 - 39) that was sent to the Commission last January, which expressed concern about the Commission's 12/7/2021 discussion and approval of the draft letter. Those concerns have not been resolved thus far.

The 2008 RMP closed over 40% of the existing routes in the Labyrinth Rims/Gemini Bridges planning area. Since then the BLM, in cooperation with local OHV groups, has added and (mostly) subtracted routes dozens of times through site-specific Environmental Assessments (EAs). Last month the BLM released its Draft EA for Labyrinth Rims/Gemini Bridges. The MTC would prefer Alternative A because we believe the current TMP is reasonable overall, and that site-specific additions and subtractions offer the most thorough and constructive process to refine the TMP. That said, in the interest of compromise, the MTC would also support Alternative D. However it should be noted that even Alternative D would close valuable routes such as the Pasture Butte section of the "Buttes and Towers" Jeep Safari route.

Even some of the seldom-used routes that Alternative D would close have major potential value. For example, a few routes north of White Wash are key for connecting the most interesting primitive roads there into a loop that's of decent quality despite the relatively drab terrain of the Morrison Formation. Why does this matter? Grand County has steered ATV / UTV use to White Wash, which doesn't interest those users for very long unless they're specifically looking for sand dunes, so they wind up searching the surrounding routes. The only marked routes are the Orange Trail, which is mostly graded road, and the various motorized singletrack and 50"-wide ATV trails. The most helpful way to get wider vehicles off these narrower routes would be to mark loops for UTV and full-size vehicle use. Such loops depend upon linking enough routes that actually offer some rugged terrain, flow, scenery, and/or variety. Some Alternative D closures would force this loop development to go through extra NEPA planning. NEPA requires exponentially more work for the BLM to re-open a route rather than just leaving it open in the first place. In this way, closing routes simply because they're seldom used hinders effective management

to guide UTV enthusiasts away from the narrower routes toward quality loops in the durable terrain further north.

The MTC would happily discuss specific routes with the Commission, and we have extended the same offer to Trail Mix, which has sent the Commission a letter that doesn't advocate for any particular alternative but does thank the Commission for advocating the interests of non-motorized recreationists. For the past two decades, both before and after the 2008 RMP, Trail Mix initiated the closure of dozens of motorized routes through building consensus. Trail Mix approached the Grand County Road Department and local OHV clubs before closing roads in virtually every trail system that their committee developed. The formation of the MTC would make this process even easier for Trail Mix provided that local OHV leaders continue to participate in the MTC. While we could dismiss attempts to rehash old agreements, we remain receptive to considering specific closures for direct objectives.

In contrast, the BLM's new and more severe version of Alternative B would indiscriminately close routes across miles of the planning area, which stems from the Commission's 12/7/2021 letter urging the closure of about a dozen particular routes and analyzing the closure of many more particular routes. The more severe Alternative B only gets about halfway to the Commission's request of closing enough routes to make 30% / 15% of the planning area become more than 0.5 / 1 mile from a motorized route. Nevertheless the more severe Alternative B would close nearly 40% of the current routes, which is on top of the 2008 closure of over 40%, leaving open 33% of what was open prior to 2008 (1,888 miles of route inventoried by 2003 plus another 200 miles that existed). Further, of the 690 miles that would be left open in Alternative B, 28% of it is Class B graded road that is useful for transportation and therefore appreciated but doesn't provide the more primitive character sought by motorized-trail enthusiasts.

495 miles of non-graded routes simply isn't enough considering that the planning area is over 300,000 acres, particularly considering that it's surrounded by national parks / wilderness / WSAs on all four sides (skipping over the Interstate 70 corridor). Alternative B would gut the quality of routes even more than the quantity. For the 45 river miles between Ruby Ranch and Mineral Bottom, it would prohibit even glimpsing Labyrinth Canyon near the bottom. Granted Alternative B would leave open a half-dozen routes that access a view of Labyrinth Canyon but, due to the entrenched meander, most stretches of the canyon would not be viewable from afar by motor vehicle. Many visitors cannot view the canyon by other means and, in a backcountry setting, motor vehicles are the practical mobility device.

Considering that this planning area is the primary destination for motorized-trail enthusiasts, Alternative B would also gut that segment of our recreation-based economy, for retaining both tourists and residents. For over half a century, motorized trails have been a vital component of the local economy, particularly since Moab is known for providing an abundance of epic opportunities for many types of recreation. Motorized-trail visitors tend to be reliable in the shoulder season, tend to spend more money per capita than their non-motorized counterparts, and pay a tax rate over 18% for vehicle rentals compared to the regular tax rate under 9%. Every year, on top of the regular grant opportunities for all kinds of recreation, the State of Utah offers several-million dollars in OHV grants funded by state and federal taxes on OHVs. For example, in the most recent semi-annual grant cycle, \$43,297 and \$34,000 in OHV grants were

awarded to Grand County SAR and EMS, respectively. Also through OHV funds, the state is expanding its own staff to assist with OHV trail work, education, and law enforcement in our area. Simply put, many resources are available for trails so long as they are open to motor vehicles.

As advocates of responsible motorized recreation, MTC members and associated organizations have spent tens-of-thousands of hours in the Labyrinth Rims/Gemini Bridges planning area implementing route closures and, for the most part, we have gained compliance because the BLM has worked with us to ensure that ample alternatives exist nearby. Otherwise our job as faithful volunteers would be less like diverting a river and more like damming it. Many parts of Alternative B and even some parts of Alternative C would prove extremely challenging to prevent visitors from either poaching the closed route, poaching non-motorized trails, blazing a new route, or eroding / braiding the remaining routes as management resources are diverted to blocking and enforcing the myriad closures. Either way, use patterns become disorganized and management becomes even more of an uphill battle, so everyone loses. Only by being more careful when employing closures can we avoid backfiring and meet the challenge of growth in all forms of visitation.

As representatives of the recreation types regulated by the Draft EA, which proposes only to subtract and not add routes to the TMP, we implore you not to support Alternative B or even Alternative C wholesale. Therefore the draft letter from Commissioner Walker concerns us greatly. Its position statement, "we hope that the final decision resembles Alternative B with only minor variations," theoretically leaves room for a few closures in Alternative B to be scaled back. However it makes clear that most variations from Alternative B should be in the direction of additional closures by claiming that "Alternative B still heavily favors motorized recreation, but provides for a small but non-trivial percentage of the area (22%) to be out of earshot of a motorized road or trail." Statements like this reveal that, even if we agreed to Alternative B now, we would have to defend the remaining access forever after.

We admire the persistence of Commissioner Walker, who advocated wilderness and NCA designations in this planning area during Grand County's development of a proposal for the Eastern Utah Public Lands Initiative in 2015. The Commission (then called a Council) allowed organized groups to present their proposals for twenty minutes, so Mr. Walker spoke on behalf of an "ad hoc" group he called "Labyrinth / Island in the Sky Working Group." He explained that the Island in the Sky Plateau stretches from Labyrinth Canyon and its tributaries down into the Island in the Sky District of Canyonlands National Park, thus roughly 40% of the plateau is already protected as a park. He proposed a TMP in which 20% of the BLM planning area is at least 0.5 miles from a motorized route.

Now that Alternative B surpasses this 20% quota by 2%, Commissioner Walker's draft letter regards it as heavily favoring motorized recreation. Given the 2015 proposal of 20%, one may wonder why the Commission's 12/7/2021 letter established the quota of 30%. An explanation may come from SUWA's 4/26/2021 letter to the BLM, which indicates that 23% of the planning area would be at least 0.5 miles from a motorized route if the BLM would simply close all routes in the areas that SUWA proposes for wilderness designation, which would prohibit all mechanized use including bicycles and hand carts. For decades, SUWA has relied primarily on congressional representatives from eastern states to sponsor its

wilderness bill, America's Red Rock Wilderness Act (ARRWA). In the Labyrinth Rims/Gemini Bridges planning area, ARRWA would close about one third of it to mechanized use (even mechanized use by managers unless they can navigate an arduous exemption process for each project). SUWA's 4/26/2021 letter goes on to say "While SUWA's alternative is a starting point for reducing the excessive motorized route density in Labyrinth Rims/Gemini Bridges TMA, it focuses only on wilderness-quality lands. It does not focus on the entire TMA. In this travel planning process, BLM must reduce route density and minimize damage to natural and cultural resources throughout the TMA. BLM should seek to balance motorized and non-motorized use in the entire Labyrinth Rims/Gemini Bridges area." In other words, the 23% quota needs to increase in order to close routes beyond just the areas in ARRWA. This is a significant departure for SUWA, which for decades told motorized-trail enthusiasts that the lands outside of ARRWA would be left alone for motorized use. Alternative B, which makes 22% of the area 0.5 miles away from a motorized route, would close many routes outside of ARRWA. Only by combining the closures in Alternative B with the closures in ARRWA would the 30% quota be reached. Excuse our rhetoric, but an alternative to meet the 30% quota could be called ARRWA on steroids.

Given that the 30% quota is beyond the pale, please recognize that the 22% "out of earshot" area in Alternative B is not the balance point it's portrayed to be, especially when considering that probably 78% of the planning area (the remainder of 22%) is quiet for the vast majority of time now and likely in future despite increasing visitation. In addition to recognizing the excessive nature of the 30% quota (and even the 20% quota proposed in 2015), please consider three more serious issues with the draft letter.

First note that the draft letter's statement "it becomes necessary to establish separate areas for quiet and motorized recreation" attempts to categorize all recreation as either quiet or motorized. This dichotomy doesn't work for electric vehicles, not even for some vehicles with internal-combustion engines. It also doesn't work for a portion of non-motorized recreationists (whether due to a portable speaker, a vocal dog, or a group that's particularly large or boisterous). We suggest more objective differentiation such as "quiet or loud" individuals and "non-motorized or motorized" recreation.

Second the draft letter states "In addition to the options of closing a route entirely or leaving it open for all users, BLM also has the option of designating some routes as administrative-only. We think this designation should be used more widely, and in particular it should be used whenever the main purpose of a route is non-recreational (for example, access routes to stock tanks, SITLA sections, or drill pads)." As far as the public is concerned, designating a route as administrative-only is closing the route entirely. We are not categorically opposed to this designation for instances when the route's recreational value is quite low and the potential for adverse impacts is quite high. However to prohibit public access simply because the road's primary purpose is to access SITLA sections would be absurd. In most cases, the road might as well be utilized by the public, even if just to picnic "out of earshot" of the motor sounds along more popular routes. Fortunately SITLA agrees because, even though public recreation is not the mandate for this type of state land, SITLA accommodates the public when feasible in deference to the shared-use ethic that rural communities in the western U.S. have traditionally upheld.

Third the draft letter states "Alternative B would close the Gold Bar Rim Trail entirely. We think it would be more appropriate to limit this route to full-sized vehicles only. Full-sized vehicles are, on average, much quieter than motorcycles or UTVs, so this limitation would help with noise in this high-conflict area, while still allowing some motorized use." Smaller vehicles have been responsibly enjoying Gold Bar and Golden Spike for decades. Regardless of generalizations, the fact is that some smaller vehicles are reasonably quiet, and some full-size vehicles are too loud. As the MTC has encouraged for the past couple of years, regulations should be based on actual sound measurements of the individual vehicle, as they're far more fair and effective than codifying stereotypes.

Further, some mountain bikers do not perceive conflicts on the few segments of the Magnificent 7 route that utilize a motorized route, but most of them prefer singletrack. If the Commission wants to actually improve non-motorized recreation opportunities along those few segments, then it should support building bicycle trail as has been done for the rest of the route. To avoid the Gold Bar Rim motorized route, a bicycle trail may not be approved along the actual rim due to wildlife concerns, but other options exist. The bicycle trail could be placed well-below the rim, even as little as a hundred feet away from the motorized route, which is far enough to discourage riding between the two routes given the juniper trees and rocks that provide screening. Likewise 7 Up should remain motorized since it's the only through-going route for motorized-trail enthusiasts to get off the pavement above the UT-313 switchbacks to reach Gemini Bridges Road. However located above the motorized route are other motorized spurs that could be connected by new bicycle trails to create a non-motorized route along with the motorized route so that everyone can enjoy a trail between the switchbacks and Gemini. These are the kind of win-win solutions that can emerge when working with motorized trail enthusiasts, which is the process that helped to develop such great non-motorized trails in the first place, and could continue to refine them. Thanks for your consideration.

Sincerely,



Clif Koontz

Motorized Trails Committee Chair