

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 "12" - route-specific letter from RWR**



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

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Dear Planning Team Members:

Please closely consider these route-specific comments from Ride with Respect (RwR). For over two decades in the Labyrinth Rims/Gemini Bridges planning area, RwR has promoted minimum-impact practices and performed several-thousand hours of high-quality trail work and restoration to implement and refine the 2008 Travel Management Plan (TMP). Another several-thousand hours of trail work was done on Sovereign Trail System that is completely encompassed by this planning area. We have assisted your staff from start to finish on dozens of amendments to the 2008 TMP in this planning area, most of which reduced access further. This experience gives us great understanding of the area, and care for the trails as well as their surroundings.

To avoid redundancy, RwR will only make route-specific comments that haven't already been made in the October 6th letter submitted by Colorado Offroad Trail Defenders (COTD), as we generally agree with COTD's comments on each route. RwR also appreciates the input of local OHV groups including the Moab Friends For Wheelin' and Red Rock 4-Wheelers on top of their decades of service work in this planning area.

RwR's list below highlights our greatest concerns with Alternative C, and our most extreme concerns with Alternative B, but it really just scratches the surface of proposed closures that would be problematic for motorized trail enthusiasts and often also for non-motorized recreation, management, and even the natural and cultural resources. The more high-value routes you close, the harder it will be for the BLM and partners like RwR to get compliance on the ground, rendering the TMP to exist only on paper.

The wilderness-expansion groups' litigation that lead to the current TMP review has seriously sidetracked RwR and others from productive work in the planning area. Fortunately the Utah OHV Program is helping more than ever, most recently funding RwR with a mini-excavator and rock-crawling truck outfitted for trail work as well as stipends for a dozen volunteer OHV Trail Hosts to educate visitors and perform light-duty maintenance largely in this planning area. Since RwR can get back to implementing and refining the TMP, which will surely include more route closures, there's absolutely no need for the current planning process to be heavy handed. The current TMP could use a scalpel, not a sledgehammer.

Sincerely,







16. rim above Dellenbaugh Butte D2925 to D2945 closed in B, C

These roads traverse slickrock that is rare north of Ruby Ranch Road, and they provide views down to the Green River. The southern spur, D7315, approaches an overlook of Dellenbaugh Butte down to the basin of Ruby Ranch and beyond. These roads are faint due partly to a lack of marking across slickrock, but they were dozed by miners, and could easily be marked to ensure that drivers and riders stay within the road bed that was previously disturbed.

17. alternate east of Oil Well Wash D2909 closed in B, C, D

This road could be marked as part of a short loop for four-wheeled enthusiasts to head north from White Wash. This road is faint due to wind-blown sand and a lack of marking across slickrock, but it was dozed by miners, and could easily be marked to ensure that drivers and riders stay within the road bed that was previously disturbed.

18. alternate further east of Oil Well Wash D2768 closed in B, C

As with D2909, this road could be marked as part of a short loop for four-wheeled enthusiasts to head north from White Wash.

19. Orange Trail east of Oil Well Wash D2405 closed in C

This road is part of the Orange Trail, plus it enables four-wheeled enthusiasts to make a short loop from White Wash.

20. Orange Trail west of Oil Well Wash D2936 closed in B, C

This road is part of the Orange Trail, plus it enables four-wheeled enthusiasts to make a short loop from White Wash.

21. Orange Trail in upper Oil Well Wash D7400 closed in B

As with Salt Wash, it's important to maintain the length of the route open in Oil Well Wash, as it demands the OHV rider to focus for an extended period, in this case on the turns and whoops more so than the deep sand of Salt Wash. As with Salt Wash, Oil Well Wash isn't as riparian, in fact isn't naturally hosting much vegetation. It's particularly important being part of the Orange Trail, and being so close to the staging area of White Wash.

22. top of Oil Well Wash OWW1 closed in B, C

As with Salt Wash, it's important to maintain the length of the route open in Oil Well Wash, as it demands the OHV rider to focus for an extended period, in this case on the turns and whoops more so than the deep sand of Salt Wash. As with Salt Wash, Oil Well Wash isn't as riparian, in fact isn't naturally hosting much vegetation. In addition to keeping riders focused, this route keeps them contained to the wash bottom.

**West of US-191 - Ruby Ranch Road to Dubinky Well Road (routes listed from north to south, generally)**

Note the following context that applies to all of the routes listed in this section (#22 through #35). The area between the Ruby Ranch Road and Dubinky Well Road may have more sensitive resources than the area further

north, but it also has one of the nation's best motorcycle trail systems, not to mention several great four-wheeling opportunities (mostly covered by the October 6th COTD letter). The motorcycle trail system is known as Dubinky since the Green River Jeep Posse hosted BLM-permitted motorcycles races throughout the 1970s and 1980s that went south all the way to Dubinky Well, and down Tenmile Canyon southwest of Dripping Spring. In 2001 the Bookcliff Rattlers Motorcycle Club hosted a motorcycle race utilizing a small portion of the old race trails, and most of the 2001 course is today marked as Enduro Loop, although the 2001 course included the part of Tenmile Wash northeast of Dripping Spring that was closed in 2008 with "closed" signs installed by RwR. In fact the 2008 TMP closed half of the routes that motorcyclists loved, from Solitude Wash at the north end to lower Bartlett Wash at the south end, with several of the best singletracks in between. What remains open provides a weekend's worth of riding with ample characteristics like varied terrain, challenging obstacles, a flow to the trail alignment, primitiveness of the route, and scenery of the surroundings. However we can't afford to lose more of this trail system without leaving riders completely unsatisfied and searching for nearby alternatives. Motorcycling Dubinky is very important for the economy and quality of life both locally and nationwide.

23. ridge NE of Dee Pass D3055 closed in B, C, D

This spur road is just one example of a spur that should be connected to other ones so short loops can be marked for four-wheeled vehicles staging from White Wash. Stabilized by the caprock of the Cedar Mountain Formation, this road follows the north rim at the east end of the Tenmile Graben, a fault-blocked valley that places Mancos Shale in the valley several-hundred feet below the Cedar Mountain Formation on either side despite Mancos Shale being several-million years younger than Cedar Mountain.

24. Enduro Loop east of Dee Pass (singletrack) EL8 closed in B

The Enduro Loop is one of the few continuous singletracks that's longer than a few miles. The section east of Dee Pass follows the bottom of the Tenmile Graben, a fault-blocked valley that places Mancos Shale in the valley several-hundred feet below the Cedar Mountain Formation on either side despite Mancos Shale being several-million years younger than Cedar Mountain. Despite the open terrain and fairly-straight alignment that allows for faster riding, this section of trail hasn't developed excessive whoops (moguls) or braids, so it requires very little maintenance. The east end of this section used to climb steeply to get out of the graben but, after RwR spent many hours rerouting it, the trail now climbs gradually and with rolling dips to drain rainwater.

25. Dee Flat Trail (singletrack) DFT1 closed in B, C

This trail provides an alternative to Enduro Loop and its own looping opportunities from the White Wash staging area. The steep alignment has caused some ledging and minor braiding, but it could easily be realigned pending BLM approval, as RwR has successfully realigned trails in significantly more difficult terrain. The trail could even be rerouted northward if preferred by the BLM. One way or another, it's important to maintain multiple options from the White Wash staging area, not just Enduro Loop to the north and Brian's Trail to the south.

26. Brian's Trail north of Mary's Trail (ATV trail) BT2 closed in B, seasonal in C

Brian's Trail is one of the premier routes from White Wash, climbing up White Wash and over a slickrock pass to reach a primitive road (D2793) at the intersection with Mary's Trail. The north end is a narrow canyon with steep grades that are sustainable due to the slickrock. The south end has sweeping view from the Book Cliffs to the San Rafael Swell and Henry Mountains. Even a seasonal closure would be very detrimental considering that springtime is the most popular season.



be routed further southeast (further away from the river) to utilize rockier terrain that would prevent the development of whoops or braids. The closed routes ("Low Water" and the historic cabin) could be further blocked and enforced, as they are occasionally poached, but the vast majority of use already stays on the designated loop.

The October 6th COTD letter pointed out that the GIS data for the parallel routes (D2763B and DC3 below The Tubes) is inaccurate, which was due to poor satellite reception in the river canyon when both routes were mapped over two decades ago. The letter is correct that D2763B refers to the road that is at the bottom, while DC3 refers to a singletrack above and east of there. Note that there are actually three singletracks east of there, with the first one being atop the gravel deposit with signs marking it as the designated singletrack. However another singletrack exists east of there down between the gravel deposit and the cliff of Navajo Sandstone. A third singletrack exists atop the Navajo Sandstone, and actually drops down through a passage in the cliff. This third, cliff-top singletrack is the most fun, but probably the least useful if the BLM seeks to further minimize the presence of motorcycles near the river (beyond closing "Low Water" and the historic cabins). The singletrack at the base of the cliff would be useful because it's on smooth slickrock that wouldn't whoop or braid, and it's screened from the river by the gravel deposit. In the worst-case scenario, if the singletrack at the base of the cliff bounces sound from the cliff to the river, motorcycles could simply use the road (D2763B), which is whooped and closer to the river but screened by a wall of vegetation between the road and the river.

The bottom line is that options exist to minimize any negative impacts of Dead Cow Loop on top of the major mitigation that RWR has already accomplished in conjunction with the BLM. Further, the positive impacts of this truly world-class motorcycle trail should not be wiped out merely because self-appointed representatives of another recreation group feel entitled to have exclusive use of Labyrinth Canyon the whole way from Ruby Ranch to Mineral Bottom. Dead Cow Loop is part of the Dee Pass Motorized Trail focus area because the 2008 RMP recognized it as important in the balance of multiple uses. Instead of disrupting this balance, the BLM should defend its decision so that the agency and its partners can refine Dead Cow Loop and focus on blocking off other areas such as Trin-Alcove Bend.

30. east of Five Miles of Whoops (ATV trail) DC1 closed in B, C

This route traverses rolling slickrock of the Navajo Sandstone. Even though it leads to the Five Miles Of Whoops, which RWR blocked off, DC1 also can still be used as a more fun alternate of the marked Tenmile Point 4WD route, or even as an out-and-back jaunt because it's that fun. RWR rerouted the east end of DC1 to avoid cultural resources, which also moved the route further away from a branch of Tenmile Canyon. RWR installed sign posts across the slickrock so that it wouldn't require annual painting. Essentially it's a benign route that adds some interest to the otherwise flat Tenmile Point area.

31. link east Tenmile Point D2863 closed in B

This is a low-maintenance primitive road that links three parallel routes (B335, B336, and D2840) to avoid at least a mile of backtracking on flat, straight roads.

32. link southeast of Tenmile Canyon D7066 closed in B

Similar to D2863, this is a low-maintenance primitive road that links two parallel routes (D2700 and D2707) to avoid at least a mile of backtracking on flat, straight roads. It's faint, yet it has been used by RWR contributors for many years, as have many other faint routes.

33. Enduro Loop west of Big Drop (singletrack) EL2A closed in B, C



37. Blue Hills Road access from the north D2588 closed in B, C

This primitive road follows the base of colorful hills exposing the Brushy Basin Member of the Morrison Formation. Then it gradually climbs over the Moab Fault to end just 200 yards short of D2533, with gentle terrain between the two routes, so a link could easily be constructed.

38. road alternate of Juniper Trail D2533 closed in B, C

This primitive road allows full-size vehicles to traverse the area between Blue Hills and Dubinky Well roads. In fact Juniper Trail relies on the north end of D2533 to connect singletrack that's currently open for motorcycling, so closing D2533 would disconnect two-wheeled use in addition to four-wheeled use. (The gap shown in BLM data between D2533 and D2536 is actually an old bladed road that has a gate for full-size vehicles and an ATV cattle guard that the BLM provided for RWR to install.) D2533 parallels the Juniper Trail singletrack, but the primitive road and singletrack opportunities are not redundant. They have worked well for decades, and both routes should remain open.

39. link south of Juniper Trail D2581A closed in B

While most use from Juniper Trail and D2533 heads east on the primitive road (D2586), some recreationists head south on D2581A to climb up toward the flats around Dubinky Well or toward "Rim of The Rim" (rim above Hidden Canyon Rim near D2529). Use of D2581A by all types of vehicle will surely increase as interest in this area grows.

40. north spur of "Rim of The Rim" D2577 closed in B, C

This primitive road overlooks the Moab Fault that separates the Blue Hills to the north from the slickrock expanse of Lunar Canyon, Hidden Canyon Rim, etc. Also a trail could be built to drop down over the fault and tie in with Lunar Canyon 4WD route or Bovine Byway motorized singletrack.

41. "Rim of The Rim" D2529 closed in B

This primitive road makes a long and winding traverse of the rim that's above Hidden Canyon Rim, which is quite valuable for all types of vehicle use. While use is sure to increase, the route's gentle grade and mixed-soil composition is well-suited to handle it.

Note that there are many important routes further east of "Rim of The Rim", such as D2560 (closed in B) that drops down to Petrified Forest, and D2383B (closed in B) that drops down Mean Hill, but most of them are covered by the October 6th COTD letter.

Finally note that there are even important routes west of "Rim of The Rim," such as D2520 (closed in B) and D2512A (closed in B and C), which may seem redundant, but won't be redundant as use increases (particularly if the area from Dubinky Well Road to Brink Spring is developed for motorized singletrack).

However we have simply run out of time to describe additional routes given the 45-day comment period. Feel free to contact us for further information. Please duly recognize the current and future value of each route.