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UNITED STATES DEPARTMENT OF INTERIOR  
OFFICE OF HEARINGS AND APPEALS  
INTERIOR BOARD OF LAND APPEALS

<p>COLORADO OFF-HIGHWAY VEHICLE COALITION, COLORADO OFF ROAD ENTERPRISE, RIDE WITH RESPECT, and TRAILS PRESERVATION ALLIANCE,</p> <p>Appellants,</p> <p>v.</p> <p>U.S. BUREAU OF LAND MANAGEMENT,</p> <p>Respondent.</p>	<p><b>IBLA Appeal No. 2024-__</b></p> <p>Appeal of the Moab Field Office’s September 28, 2023 Decision Record, Environmental Assessment, and Finding of No Significant Impact for the Labyrinth Rims/Gemini Bridges Travel Management Plan</p> <p>DOI-BLM-UT-Y010-2020-0097-EA</p> <p>(COMPANION APPEAL IBLA 2024-0040)</p>
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**NOTICE OF APPEAL**

Pursuant to 43 C.F.R. § 4.411, Colorado Off-Highway Vehicle Coalition, Colorado Off Road Enterprise, Ride With Respect, and Trails Preservation Alliance (collectively “Appellants”) hereby provide notice that they appeal the September 28, 2023 Decision Record, Environmental Assessment and Finding of No Significant Impact of the United States Bureau of Land Management (BLM) on the Labyrinth Rims/Gemini Bridges Travel Management Plan, DOI-BLM-UT-Y010-2020-0097-EA, issued and approved on

September 28, 2023 by Nicollee Gaddis-Wyatt, BLM Canyon Country District Manager, who has supervisory authority over the Moab Field Office.

Appellants are adversely affected by the BLM's decision and have the right to appeal pursuant to 43 C.F.R. § 4.410(a).

This Notice of Appeal is timely filed in the office of the officer who made the decision, within 30 days after the BLM issued its Decision Record, pursuant to 43 C.F.R. §§ 4.411(a)(1) and 4.411(a)(2). The thirtieth day following the September 28, 2023 issuance of the subject Decision Record falls on a Saturday, October 28, 2023. The next business day is Monday, October 30, 2023, the date that this Notice of Appeal is timely filed. 43 C.F.R. § 4.22(e).

This Notice of Appeal is timely served upon the BLM officer who made the decision, Nicollee Gaddis-Wyatt, BLM Canyon Country District Manager, and the U.S. Department of Interior's Office of the Regional Solicitor, Intermountain Region, pursuant to 43 C.F.R. §§ 4.401(c) and 4.413(a).

Appellants submit herewith a Petition for a Stay of Decision Pending Appeal and supporting Declaration of Clif Koontz, and the Appellants will file a Statement of Reasons with the Interior Board of Land Appeals within 30 days of filing this Notice of Appeal, pursuant to 43 C.F.R. §4.412(a).

Respectfully submitted this 30th day of October 2023.

/s/ J. Mark Ward

*Attorney for Appellants Colorado Off-Highway Vehicle Coalition,  
Colorado Off Road Enterprise, Ride with Respect, and Trails  
Preservation Alliance*

### **CERTIFICATE OF SERVICE**

I hereby certify pursuant to 43 C.F.R. §4.401(c)(5), that on this 30th day of October 2023, the foregoing PETITION FOR A STAY PENDING APPEAL was or will be served in accordance with the applicable rules as follows:

By E-Mail (pursuant to the April 3, 2023 Standing Order of the Director of the Office of Hearings and Appeals) transmitted on October 30, 2023 to:

Interior Board of Land Appeals  
801 N. Quincy Street, Suite 300  
Arlington, VA 22203-1725  
*ibla@oha.doi.gov*

By personal delivery (pursuant to 43 C.F.R §4.401(c)(4)(i)(A)) on October 30, 2023 to:

Nicollee Gaddis-Wyatt  
BLM Canyon Country District Manager  
Bureau of Land Management  
82 East Dogwood  
Moab, UT 84532

And by E-mail in accordance with lead counsel Leah Peterson's waiver (for herself and for her co-counsel Andrew Simek) of service by U.S. Mail (pursuant to 43 C.F.R. §4.401(c)(4)(i)(D)) to:

Office of the Regional Solicitor  
Intermountain Region  
% Leah Peterson  
Andrew Simek  
6201 Federal Building  
125 South State Street  
Salt Lake City, UT 84138-1180  
*leah.peterson@sol.doi.gov*  
*andrew.simek@sol.doi.gov*

/s/ J. Mark Ward