



On August 28, 2008, the Colorado 500 Legal Defense Fund (now reorganized as the Trails Preservation Alliance, a 501c3) and COHVCO, joined forces to submit three protests of the Moab Proposed RMP/FEIS to the Washington Office BLM. Due to the 30 day deadline and the complexity of the issues, we limited our protests to the parts of the Moab Decision that are most likely to cause both long-term and short-term harm to our sport.

These actions were a result of a year's worth of work, culminating last fall in extensive and detailed comments on the Moab Draft RMP. Utilizing information provided by members of the TPA, COHVCO, Ride with Respect, and a number of individuals, TPA/COHVCO submitted over 16 separate documents in a cooperative attempt to change the Moab proposals that will clearly harm motorized access and motorized recreation. In every comment we provided a solution that BLM could use in the Final RMP. Unfortunately, BLM did not accept enough of our changes to preserve what we consider a viable "OHV" route system on Moab BLM lands.

A copy of our protest package was also provided to the Blue Ribbon Coalition to insure that all interested groups share their information.

The three Moab PRMP/FEIS protests:

Moab Protest # 1. We protested the insertion of "resolving user conflict" into the Purpose and Need for the Moab RMP. This is a very dangerous change-of-course for BLM RMP's. We contend that it was never the intent of Congress for BLM to consider "user conflict" in any land use allocation decisions, and therefore this "need" is seriously outside the authority of RMP Decisions.

Moab Protest # 2. We protested the Travel Plan in total. We protested the methods that BLM used to gather route inventory data, and we protested the methods BLM used to designate (or not designate) motor recreational trails. Our basis for the protest was multi-fold: BLM lacked sufficient factual information about Moab visitors and their chosen activities to make rational allocation decisions; BLM's Travel Plan analysis lacked specific, factual information about the OHV trails that were closed; and, the research BLM used to support the closures did not "inform" the designations. We used GIS analysis to show that the Travel Plan, as it relates to motor recreation, is simply irrational.

Moab Protest #3. We protested the establishment of the "Bookcliffs ERMA." BLM wants to make *everything* north of I-70 non-motorized. They will designate a few of the existing roads and a few fragments of the Thompson Trail, but the emphasis will be non-motorized recreation. All of the existing singletrack has been omitted from the BLM maps. The Bookcliffs ERMA, just by chance we



suppose, completely surrounds the three largest WSA's in the Moab jurisdiction. We provided detailed evidence that Moab BLM is using the RMP process to manufacture Wilderness.

BLM has promised a prompt decision on our protests, but they have set no deadline. If they decide against us, the next step is litigation. We have built a very strong case right from the beginning of this process, so we believe we have a better-than-usual chance to prevail if we do have to go to court. Let's hope that BLM recognizes this in our protests, and sends the Travel Plan back for a proper re-do, changes the Bookcliffs ERMA designation, and, perhaps the most important of all, removes "resolving user conflict" from the Purpose and Need.

IN ADDITION TO THE MOAB WORK, TPA and COHVCO have also submitted documentation to the following other BLM draft RMP plans:

Richfield. We recognize and appreciate that many organizations and individuals have put thousands of hours, dollars and tears into saving access in Richfield. We sincerely hope that our effort helped.

We requested BLM remove user conflict from the purpose and need, same as Moab. We submitted corrections to the research BLM is using to evaluate the effects of trail-based motor recreation. We attacked the rationale behind making the largest contiguous acreage of the Richfield F.O. "emphasize non-motorized recreation," and, just by chance we suppose, connecting several WSA's---and so we again provided detailed evidence that BLM is using the RMP process to manufacture Wilderness.

Monticello. We demanded that resolving user conflict be removed from the Purpose and Need, again. We attacked the proposed nonmotorized SRMA, which would---yup, connect several WSA's---and in effect manufacture more Wilderness. We used GIS analysis to show how their proposed route designation method was not only contrary to BLM directives, it was just plain irrational.

We did comment on the Price SEIS, however, our effect was limited to the SEIS only.