



June 21, 2022

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

RE: Utah Rims Camping Proposal  
DOI-BLM-UT-Y010-2021-0095

Dear Sirs:

Please accept this correspondence as the comments of the above Organizations expressing serious concerns with the Utah 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 Utah Rims area provides high quality dispersed recreational opportunities that are highly sought after by our members as those

members have moved away from the Moab area to seek less intensive recreational opportunities and avoid the crowds of users now in and around the Moab areas.

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, Rabbit Valley efforts on the GJFO and BLM Royal Gorge FO. 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 which we vigorously support. This model provides high quality recreational experiences for all users. Much of the basic information necessary for discussion quality recreational opportunities in the area is not provided at all in the Proposal. This makes any meaningful discussion of why other efforts have succeeded and how to improve the current proposal very difficult or almost impossible. Based on the experiences of the Organizations with these other camping plans, there are foundational steps for success that must be addressed in any dispersed camping effort and none of these are addressed in the Proposal.

An example of this would be the failure of the EA even to provide a rough estimate of how many dispersed sites are in the Utah Rims area currently and how many of these sites would be estimated to be designated. Additional relevant information for the public might include a basic discussion of the strategies for the designation of some dispersed sites and closure of others. Was the plan to develop a trailhead in this area with these camping sites anchoring the trailhead? Is the area designed to provide a more group centered camping experience or is the site designed to provide higher levels of solitude? These are basic questions that must be answered to successfully develop camping plans and are often the basis of significant interactions with the public. 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.

The Moab FO RMP mandated coordination of the management of the Utah Rims area with Rabbit Valley efforts in the Grand Junction FO since 2008. Despite the GJFO having a completed and implemented camping plan for Rabbit Valley for more than a year, this effort is even mentioned in the Utah Rims EA. Probably the most troubling aspect of the EA is the fact that there is visitation data that has been collected for the Utah Rims area by the Grand Junction FO but for reasons that are completely vexing, it is not even mentioned in the EA. Rather planners have chosen to proceed with analysis based on broad summaries such as visitation increased “a lot”. If the goal of this effort is to erode public support for the effort, planning decisions such as this would be a significant step in achieving that goal. The Organizations question the value of that goal and assert high quality recreational opportunities as required by the RMP must be developed based on high quality data and not general suppositions.

**1a. The EA lacks basic information on the recreational activity in the area.**

Prior to addressing the Organizations more specific concerns on detailed 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 believe that the high levels of quality analysis that is required by these planning requirements frequently 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 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:

---

<sup>1</sup> 40 CFR 1500.1

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

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

"(b) NEPA procedures must insure 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.*"<sup>4</sup>

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))."<sup>5</sup>

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."*<sup>6</sup>

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

---

<sup>4</sup> See, 43 CFR 1500.1(b)

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

<sup>6</sup> 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

planning area has been made and often relevant planning documents simply are not mentioned in the Proposal. 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.

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.

**1b. The 12 questions provided in the Proposal 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 Utah Rim area. Not only are there no positive attributes of recreation in the area identified, there is also no mention of the SRMA criteria for management of the area. Rather than addressing challenges in a balanced manner, the decision appears to be made that these impacts are sufficient to warrant closures and restrictions. We simply have no idea how this decision or how current management was found to be insufficient. Analysis of the current management situation would have prompted analysis of the success of educational efforts and consistency of messaging. These questions could have determined that FO guidance for this area was functionally no-existent and what little there was is incorrect. Problems like this undermine any management effort and simply must be addressed to create success.

After reviewing the 12 questions, one could easily mistake the management objectives for the area as those of a wildlife habitat area or an Area of Critical Environmental Concern. Obviously, this is totally incorrect. This is highly prejudicial as appears to have decided there are impacts,

but fails to discuss what the impacts are in any detail or how these levels of impacts would align with the requirements of the SRMA and recommended management for the area. This would be highly relevant information for the development of an RMP and clearly could have guided several of these questions in a far different direction.

**1c. Comparisons of the Proposal to other EA for dispersed camping.**

As previously mentioned, the Organizations have participated in NEPA analysis of numerous 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. Often these plans have developed a strategic vision for the area moving forward with phased development of the camping resources based on visitation to the area. The Proposal entirely lacks this type of strategic vision as analysis like this is difficult to impossible to create without detailed 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.

**1d. Alignment of Utah Rims management with Rabbit Valley efforts is simply never discussed.**

The Organizations vigorously assert that the insufficiency of the Proposal analysis is specifically highlighted by the complete lack of analysis of how the Proposal will align with GJFO planning in the Rabbit Valley area. This is critical information as it is required in the RMP. This type of information would also be critical for the development of a staggered or phased implementation type plan for Utah Rims area. As an example, we often see planning start with phase 1 and phase 2 of the plan would be triggered when visitation reached a specific level and these types of adaptable management plans have been highly successful over time in providing quality recreational experiences and reducing management costs in the long run.

The Organizations would note that there is more actual information on the Rabbit Valley in their press release about the project than in provided in the entire EA for the Utah Rims. The press release on the proposal for the Rabbit Valley area provides the following summary:

“Currently there are three developed campgrounds with 19 campsites for car and tent camping in Rabbit Valley. The proposal considers establishing two new campgrounds and a new parking area and expanding an existing campground. In total, 72 campsites would accommodate a mix of tents, trailers and vehicles. The proposal would allow camping exclusively in these areas.”<sup>7</sup>

The Organizations would note there was a complete and detailed information on the current usage of Rabbit Valley, a vision for Rabbit Valley moving forward and other significant information provided in the Rabbit Valley EA and business plan. The business plan for the Rabbit Valley, which was a component of the EA, is comparable in size and far more detailed than the entire Utah Rims EA. This could not show the insufficiency of the Proposal analysis any more completely. The following chart and summary were provided in the Rabbit Valley Camping business plan:<sup>8</sup>

---

<sup>7</sup> See Press release available here: [BLM evaluating camping opportunities in Rabbit Valley | Bureau of Land Management](#)

<sup>8</sup> See, DOI Rabbit Valley Camping Plan at pg. 9. A copy of this camping plan has been attached as Exhibit “1” to these comments.



The data in the visitation graph represents adjustments made for over counting by the unit, average number of people per vehicle, entrance/exit, other access points, and access by bicycle.

Table 2. Total visits for Rabbit Valley and the Utah Rims

Year	Rabbit Valley (MCNCA)	Utah Rims (Moab BLM)
2018	34,085	42,150
2017	35,089	40,533
2016	*26,342	37,303
2015	31,062	34,700
2014	28,189	30,174
2013	29,737	29,014

\*The 2016 count for Rabbit Valley is likely somewhere between 31-35,000 visits. A large portion of data was estimated for the spring and summer when the unit failed to collect information.

While good data is available to align the Utah Rims area efforts with existing management in Rabbit Valley, for reasons that are unclear it has not been used. Rather the Moab FO seeks to manage based on summaries of visitation such as “a lot”. The Organizations are further concerned that this data shows usage levels higher in the Utah Rims area than on Rabbit Valley many years. Not only does the Rabbit Valley plan provide critically lacking information in the for the Utah Rims Proposal regarding visitation levels, this plan also would provide significant insights around the volume of use around holidays, types of vehicles being used, desired experiences and other information. Not only would this type of information be helpful in the Utah Rims planning, the additional planning review would also ensure that any weaknesses in the Rabbit Valley plan could be addressed in Utah Rims. This would allow these problems to be addressed moving forward rather than exacerbated. These are reviews and analysis required by the Moab RMP but also by basic requirements for good management.

Even more concerns arise from the fact that the Utah Rims effort never mentions the fact that Rabbit Valley has had a completed camping plan in place and functioning on the ground for a year or more. This is surprising to say the least as the Moab FO RMP specifically requires alignment of the Utah Rims and Rabbit Valley planning efforts. The Organizations assert this type of failure is deeply concerning and centers around the issue that if the two areas are not coordinating now as required in the Moab FO RMP, why would the public expect this to change in the future. This is the type of ideological leap of faith the public should never even be asked to accept as sufficient for NEPA purposes.

**2a. There is a 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 complete lack of educational materials for camping in the Utah Rims planning area. While we appreciate the concerns about resource impacts in the area, the Organizations are also intimately familiar that 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 only information we are able to locate about the area is in the Moab FO RMP and we assert it is simply unreasonable to expect the public to explore a document thousands of pages in length for possible camping restrictions. The Organizations are not aware of any kiosks or other informational resources in the Utah Rims area that could provide basic educational resources to the public.

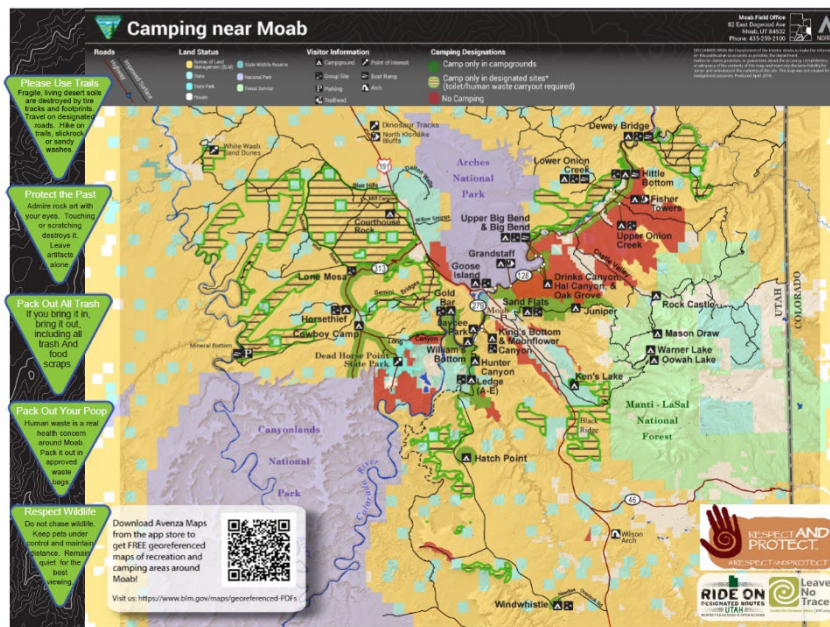
What limited camping information that is available for Utah Rims is highly generalized and completely incorrect. An example of this would be the following summary of the FO provided in the Moab FO website:

“Most of the field office remains open to primitive camping experiences, however dispersed camping is restricted to designated sites in certain areas, such as along the Dubinky Well Road, Gemini Bridges Road, the Black Ridge Road, and Pack Creek Roads, the area accessed by the Mill Canyon Road and the Blue Hills Road, and south of Moab in the Blue Hill/Picture Frame Arch area. There are a limited number of sites marked with a brown post and tent symbol. When dispersed camping please practice leave no trace principles such as packing out all trash and human waste.”<sup>9</sup>

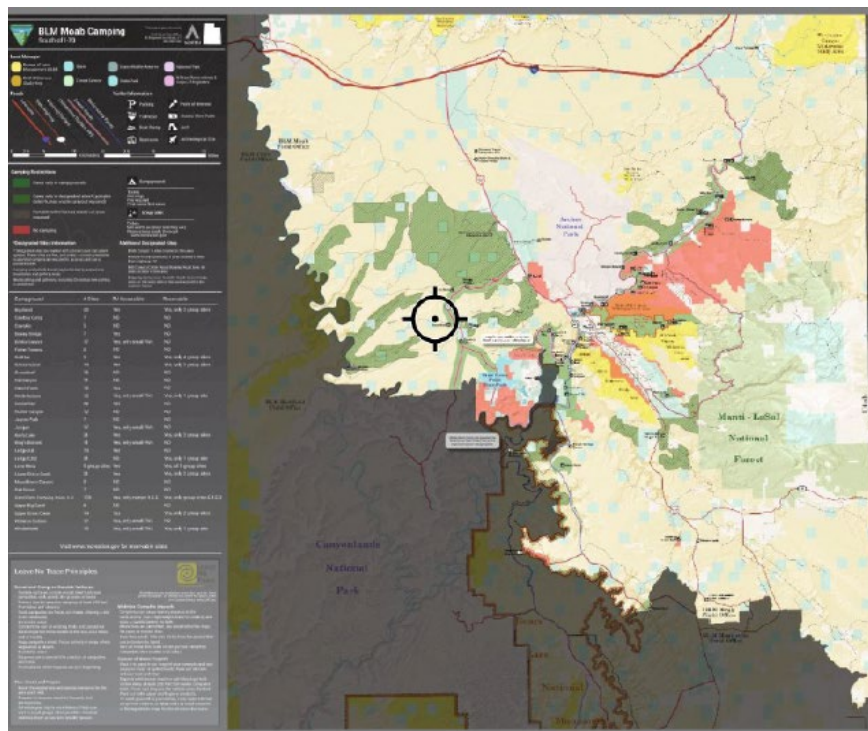
The Utah Rims area is not even provided for in the Moab FO Visitor Guide, reflected below, as that stops in the Dewey Bridge area and does not go far enough north.

---

<sup>9</sup> Utah - Recreation | Bureau of Land Management (blm.gov)



Additionally, the BLM also provides the following camping map for download on the Avenza mapping platform. The Utah Rims area is again omitted from this map, in anyway other than the general guidance on the map, which 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. 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. A simple Google Search for camping information provides no information whatsoever and Recreation.gov has no information at all about the area listed. As a result, the public is forced to make assumptions about what camping requirements are for the area, and this never leads to success.

As the public is now forced to make assumptions about proper use of the area, anecdotal information or experiences on other FO or areas will be relied on. Our concerns on this type of management by rumor are well based as not only is there incorrect information on the area provided, such as the statement that dispersed camping is allowed generally, there is no mention of RMP provisions that motorized vehicles still must remain on routes while camping.<sup>10</sup> This is a significant concern when the public is forced to guess what restrictions are in any area, as many areas, motorized vehicles may be brought to dispersed camping sites. Some FO provide that dispersed camping must be within 100ft or 300ft of the road to be legal. The fact that motorized vehicles must remain on the trail in the Utah Rims camping areas and not brought to a dispersed campsite is highly unusual and the public simply must be educated on this type of restriction.

The Organizations must question why there was a thought that existing restrictions would be successful in the area, when no one is aware of these restrictions. The Proposal almost seems to blame the public for the complete lack of educational materials for this area. This is at best completely the reverse of how this relationship is supposed to function. The reversal of this situation will create significant conflict with the public moving forward and that conflict will negatively impact the ability of land managers to partner with users to create educational materials and will also erode support for any new educational materials.

---

<sup>10</sup> See, Proposal at pg. 5.

**2b. 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 as the public cant comply with regulations that are functionally impossible to find and comply with. The plan must lay out how accurate information to the public will be provided electronically and on site through resources such as kiosks.

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

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. There are several good reasons for this type of standard, such as the following:

- 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.

The Organizations are very concerned that the Proposal continues to fail in addressing how high-quality recreational opportunities will be provided in the area, and as a result the public will be forced to ad-lib these types of standards. This never works well.

**3a. The Utah Rims SRMA Characteristics are poorly summarized in the Proposal and avoid basic discussion of actual alignment for the area.**

The Organizations are very concerned that there is an exceptionally poor summary of the characteristics, and the failure to characterize these factors leads to a conclusion that does not align with the limited analysis provided in the EA.

The Proposal provides the following outline:

“The Utah Rims SRMA is a Community SRMA (the majority of visitation being from the local community, which in this area is generally Grand Junction, Colorado) that is managed “to provide sustainable opportunities for motorized, mechanized and non-motorized route-related recreation while protecting and maintaining resources values” (2008 RMP, page 96). The 2008 RMP calls for working with BLM Colorado to coordinate management of Utah Rims and Rabbit Valley (Colorado).”<sup>11</sup>

The 2008 Moab RMP specifically provides the following management prescriptions for the Utah Rims area:

“Manage Utah Rims as a Community SRMA (15,424 acres) to provide sustainable opportunities for motorized, mechanized and non-motorized route related recreation while protecting and maintaining resource values including range, wildlife habitat, scenic, cultural, recreational, and riparian values in current or improved condition. Work with Colorado BLM to coordinate management of the Utah Rims and Rabbit Valley Colorado areas. Management actions will include:

- Manage the Kokopelli's Trail for recreation use.
- Manage Bitter Creek Campsite for camping.
- Limit motorized and mechanized travel to a designated road and route system, including where feasible, the establishment and management of a network of single-track routes.
- Acquisition of public access across non-Federal lands for the route system.

---

<sup>11</sup> See, Proposal at pg. 7.

- Development of a staging area.
- Potential separation of types of single-track route use by time period.
- Limited provision of camping facilities.
- Prohibition of competitive, motorized events on the single-track route system to maintain its single-track nature.
- Add single-track routes to the route system on a case-by-case basis pending resolution of resource concerns.”<sup>12</sup>

When the recreational characteristics of the SRMA are reviewed in the Proposal, specific characteristics for the Utah Rims SRMA prescribed in the RMP such as a staging area are not addressed at all. Resources like staging areas are factors that would be related to camping sites and possible educational resources such as kiosks. Obviously, resource like staging areas and camping areas that should be placed in a single location. This type of resource should also give rise to leveraging these sites as these are prime locations for educational kiosks and bathrooms. With the current summary of the RMP in the EA, discussions like this are simply never addressed at all in the 12 questions or the EA more generally. This is simply unacceptable and must be addressed. A detailed discussion of how these factors is actually aligned is even more critical now, given the failures of alignment of the Utah Rims and Rabbit Valley area outlined elsewhere in these comments.

Additionally, given the requirement to protect or maintain existing resources wouldn't analysis or even a brief description of the current condition of these resources be warranted in order to inform the public what the condition is currently. Rather than attempting to address these factors with some level of detail, the EA simply omits this discussion. This is simply unacceptable and must be addressed.

**3b. Collaboration with the Rabbit Valley effort must address possible short falls in analysis of camping opportunities in the Rabbit Valley area**

---

<sup>12</sup> See, RMP at pg. 96.

In discussions the Organizations have had with our members about the Rabbit Valley Camping plans recently finished by the Grand Junction FO, our members expressed serious concerns about the Rabbit Valley camping plan cutting too deep into opportunities. Recent management efforts reduced around 100 dispersed sites to around 54 designated sites after the plan. As a result of these restrictions, it was believed that a significant number of people have moved over to Utah Rims area this year to find camping opportunities.

There were also significant concerns about possible subsequent relocation of campers as the Rabbit Valley area continued to see a large number of multiple campers on single sites in the Rabbit Valley area. Also in some areas, the public continued to use old dispersed sites after the sites had not been completely obliterated. Both of these actions are in violation of the new Rabbit Valley plan. A further concern is there is not a lot of enforcement of the new Rabbit Valley camping restrictions.

The Organizations are concerned that when there is enforcement of Rabbit Valley designations for camping, a lot of campers currently in the Rabbit Valley area would be displaced to other camping locations. The Organizations believe this concern warrants inclusion and discussion as a concern for Utah Rims even if tough to quantify. However, we are not sure how you would ever even attempt to capture this type of a concern with the limited information in the Proposal. Maybe this is referred to the alternative to address visitation at levels of "a lot plus some?" for planning purposes.

The Organizations are also concerned that while the current Proposal asserts it will align with the Rabbit Valley efforts, the Proposal does not reflect any level of alignment between Rabbit Valley efforts and the Proposal. This could not be more exemplified than by the following situation. Rabbit Valley planners have collected five years of visitation to the Utah Rims area but this information is simply never mentioned in the Proposal.

**4a. 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.

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).”<sup>13</sup>

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.”<sup>14</sup>

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

---

<sup>13</sup> See, RMP at pg. 21.

<sup>14</sup> See, RMP at pg. 127.

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 route may be modified through subsequent implementation planning and project planning on a case-by-case basis and based on site specific analysis in conformance with the National Environmental Policy Act.”<sup>15</sup>

The myriad of problems these provisions create is simply astonishing, and rather than clarifying provisions, these amendments to 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

---

<sup>15</sup> See, RMP at pg. 20.

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.”

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.”*<sup>16</sup>

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

---

<sup>16</sup> See, 43 CFR § 6301.5

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.<sup>17</sup> 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 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: <sup>18</sup>



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...

---

<sup>17</sup> See, TMP scoping report August 2021 at pg. 3.

<sup>18</sup> See, Indian Creek TMA\_OID154

**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.<sup>19</sup> 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.

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. The Proposal conflicts with State planning efforts.**

As previously noted, the Organizations have concerns regarding the vision of the 12 questions presented to guide the Proposal development. These in no way align with State planning documents guiding the development of recreational opportunities. Rather than meaningfully developing information on these issues, these goals and objectives are simply never mentioned in the analysis at all. The conflict between these goals and objectives and the Proposal is significant and immediate.

The State of Utah strategic plan for resource management provides as follows:

“-While participation in outdoor recreation continues to climb, there are ample opportunities to engage more of our residents and visitors in these activities. With an eye to the States changing demographics and future increased demand, we

---

<sup>19</sup> See, RMP: Wilderness Characteristics Area management standard WC-1 at 87.

must think ahead, recognize coming challenges and make outdoor recreation a part of our strategic thinking.

- The State supports linking communities through the creation of trail systems and aims to meet the recreational needs of its visitors and citizens, including youth and groups with special needs. The State supports the continuation of the Utah Outdoor Recreation Grant Program to promote and fund outdoor recreation infrastructure on Federal, State, and private land.”<sup>20</sup>

Utah state plan for recreation moving forward also provides for the following economic considerations as follows:

“The tourism and recreation industries are major drivers for Utah’s economy. Without Utah’s travel and tourism industry, it is estimated that each Utah household would have had to pay an additional \$1,200 in state and local taxes to maintain the same level of government services (9). In 2016, visitor spending generated close to \$200 million in total (10) income tax revenue that went towards Utah education funding. Approximately \$65 million in total tourism-generated motor fuel tax revenue was directed to Utah’s transportation system and its infrastructure. An additional \$400 million in total state sales tax revenue was deposited in Utah’s General Fund where it was used to pay for essential services including:

- Health and human services
- Corrections, courts and the justice system
- Public Safety
- Economic Development Programs”<sup>21</sup>

Again, these are resources that warrant discussion in the EA and these provisions are simply never mentioned at all. This is simply unacceptable and must be addressed.

## **5. Concerns over 2020 usages may be premature.**

---

<sup>20</sup> [State Resource Management Plan \(arcgis.com\)](#)

<sup>21</sup> [State Resource Management Plan \(arcgis.com\)](#)

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.”<sup>22</sup>

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. Anecdotal

---

<sup>22</sup> See, Proposal at pg. 1.

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.

**6. Facilities being developed should provide a high-quality recreational experience at all times.**

The Organizations vigorously submit that high quality recreational resources must be the goal of every phase of the effort. There were concerns about human waste removal in the Proposal area. While this impact appears to be a concern, it is never addressed in the Proposal. The Organizations must ask why toilets would not be looked at as a management tool for this issue.

It has been our experience 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.

The higher level of desirability and recreational experience provided by the vault style toilet will also lead to another important improvement. That is the improvement in resource protection that will result from people actually wanting to use these resources. 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.

#### **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.**

The Organizations are very concerned that the Utah Rims area provides high quality dispersed recreational opportunities that are highly sought after by our members as those members have moved away from the Moab area to seek less intensive recreational opportunities and avoid the crowds of users now in and around the Moab areas. The Organizations and our members have

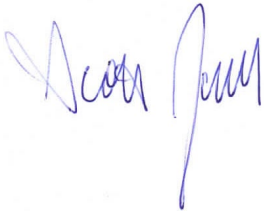
participated in the development of dispersed camping plans throughout the Western United States, such as the current planning effort for the Moon Rocks area in the Carson City BLM FO and efforts in the Badger Flats area of the Pike/San Isabel NF and BLM Royal Gorge FO. The Organizations are aware that a combination of fully dispersed and designated dispersed camping can provide a wide range of opportunities in any recreational area.

An example of this would be the failure of the EA even to provide a rough estimate of how many dispersed sites are in the Utah Rims area currently and how many of these sites would be estimated to be designated. Additional relevant information for the public might include a basic discussion of the strategies for the designation of some dispersed sites and closure of others. Was the plan to develop a trailhead in this area with these sites anchoring the trailhead? Is the area designed to provide a more group centered camping experience or is the site designed to provide higher levels of solitude?

Much of the basic information necessary for this type of discussion is not provided at all in the Proposal, making any meaningful discussion of why other efforts have succeeded and how to improve the current proposal very difficult. 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,



Scott Jones, Esq.  
USA Vice President  
Authorized Representative



Fred Wiley, ORBA President and CEO



Steve Egbert  
President – United 4x4



Matthew Giltner  
Chairman – One Voice