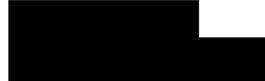




Ben Burr, Policy Director
BlueRibbon Coalition



Ryan Nehl, Manti-La Sal NF Supervisor
Manti-La Sal National Forest Supervisor's Office
599 West River Drive
Price, UT, 84501

Ryan,

BlueRibbon Coalition/ShareTrails (BRC) is writing to provide feedback for the Manti-La Sal National Forest Land and Resource Management Plan Revision. BRC is a national non-profit organization that champions responsible recreation and encourages a strong conservation ethic and individual stewardship. We champion responsible use of public lands for the benefit of all recreationists by educating and empowering our members to secure, protect, and expand shared outdoor recreation access by working collaboratively with natural resource managers and other recreationists.

Our members use motorized and non-motorized means of access, including OHV use, equestrian activities, mountain biking, and hiking to enjoy recreation upon state and federally managed lands throughout the United States, including those designated as National Forests. Many of our members and supporters live in and/or recreate in Utah and use the aforementioned means to access Forest Service managed lands throughout Utah, including the Manti-La Sal National Forest. In addition to access travel itself, BRC members visit the lands mentioned herein for motorized recreation and the other aforementioned recreational activities, sightseeing, photography, rockhounding, hunting, wildlife and nature study, camping and other similar pursuits. BRC members and supporters have concrete, definite, and immediate plans to continue such activities in the future.

The Manti-La Sal National Forest is a very popular area for off-highway use, hunting, dispersed camping, and other recreational activities which our members support and enjoy. Covering five distinct and topographically diverse districts across Utah and Colorado, the Manti-La Sal National Forest has served to provide a rich array of opportunities for recreational activities and appropriate natural land resource use for locals and tourists across both states. The use seen in

these areas has also been beneficial to the economies of the adjacent counties and the livelihoods of those counties' citizens. The rich opportunities available in the Forest are of the nature that inspire awe and respect for these Forest Lands and enrich the lives of those who recreate in and or live near them.

As the National Forest Service works to preserve the beauty, life, and resources in these areas, strong consideration should be given to maximizing OHV trail access in this area since the minimization of OHV related impacts is often facilitated by the proper designation and maintenance of trails in areas where OHV use has historically occurred and where OHV use is also complementary to the other recreational activities that such trails and areas exist to facilitate. In the Manti-La Sal National Forest, as in many other public lands across the state, many non-motorized recreational opportunities are best reached through the use of an OHV.

We are concerned that the current recreational zoning in the proposed Land Management Plan Revision will seriously restrict the responsible use of trails by recreationists and will be detrimental to the accessibility and responsible use of the Forest. To assign wilderness classification to half of the La Sal Mountains, for example, would close the majority of the Forest's existing trails to regular mountain-bike use. This would also impose serious restrictions on motorized recreation that did not previously exist under the old plan. Furthermore, the proposed zoning would preemptively preclude many areas from consideration for both new and traditional forms of motorized access in the travel management process.

Rather than imposing the drastic restrictions on recreation in the Manti-La Sal National Forest as found in the current draft of the plan revision, we would hope to see the integrity of the Forest's characteristics preserved and enjoyed through modest and responsible development of existing and new recreational opportunities. We, along with Ride with Respect and Sage Riders, would like to see the modest development of motorized trails in the San Pitch Mountains, Price Ranger District, and Moab District with connector trails the Sanpete, Ferron, and Monticello Ranger Districts.

In addition to a modest development of trails and less restrictive recreational zoning in the Forest, we would also hope to see the following specific changes by section:

1. (Section 2.1.3) Wetlands and Groundwater-Dependent Ecosystems

In agreement with Ride with Respect and Sage Riders, we hold that the following statement is impracticably restrictive: "To protect groundwater-dependent ecosystems and wetlands, new road and trail development shall not be authorized." As groundwater-dependent ecosystems cut across the planning area at multiple locations, making reasonable access without some minimal disturbance impossible, we suggest in concurrence with these groups that the statement, "...except to cross them in sustainable locations," ought to be added.

2. (Section 2.10) Recreation and Access, (Section 2.10.1) Recreation Opportunity Spectrum.

Sections FW-ROS-DC-05, FW-ROS-ST-01, FW-ROS-ST-02, and FW-ROS-GD-01 reference the ROS system in a way that would alter the system's traditional meanings, effectively restricting all motorized use in non-motorized ROS zones. If this new definition is to be used, we propose that most of the forest remains in a motorized ROS zone. There is already a low density of designated routes within motorized zones: less than 1% of the Forest acreage within these zones are covered by designated trails, leaving an already small impact on the area.

The current draft, rather than facilitating the motorized access which also facilitates use of much of the other recreational and natural resource opportunities available (including hunting, which many citizens of local communities use and rely upon as part of their food supply), reduces motorized zones from 90% of the Forest's lands down to 50%. Furthermore, many of the specific areas designated for closure in the revision draft exist parallel to already existing motorized routes, which may restrict future travel management planning from establishing reasonable connectivity between routes or creating modest, beneficial extensions of routes for future use.

In summary, we find that the ROS zones proposed in the plan revision draft would restrict beneficial and reasonable travel management options from being considered in future travel planning. We propose that the current zones be kept in place and that more precise restrictions and designations be addressed in the course of travel management planning as this will allow for more tailored solutions to be brought forward. We disagree with the apparent attempt in this draft to preempt the travel management process by precluding areas from travel planning consideration through excessive zoning restrictions and respectfully request that the related sections be accordingly revised. We believe that doing so will more appropriately balance future travel management and responsible access with wilderness and resource preservation.

3. (Section 2.10.3) Access

We recommend, along with Sage Riders and Ride with Respect, that the "diversity of users and vehicle types" be expanded to include full-size 4WD trail opportunities as many of these trails already exist and are an integral part of the current recreational and responsible natural resource use the Forest already sees. We also recommend that the restriction of trail width to 66" be removed from the draft and left to subsequent travel management planning so as to allow for more fitting area specific direction.

4. (Section 3.1.1) Wilderness Areas

As also observed by Ride with Respect and Sage Riders, the direction that the draft of the current plan revision gives to "consider closing or restricting use" along the Peavine Corridor in the Dark Canyon Wilderness following routine assessment if impacts to wilderness characteristics or other conflicts are observed, is inconsistent with the Utah Wilderness act of 1984. While education and other projects may assist in the road's sustainability, the route should not be closed. The act expressly prohibits, "the creation of protective perimeters or buffer zones around any wilderness area."

5. (Section 3.1.9) Inventoried Roadless Areas

As many inventoried roadless areas contain motorized trails currently designated for motorized use, we recommend in agreement with Sage Riders and Ride with Respect that the statement, “These areas provide recreational opportunities for nonmotorized users all year long. This is reflected in recreation opportunity spectrum classes Primitive and Semi-primitive Nonmotorized,” be revised to state, “These areas provide recreational opportunities for non-road uses all year long. This is reflected in recreation opportunity spectrum classes Primitive, Semi-primitive Nonmotorized, and Semi-primitive Motorized.” As has been mentioned elsewhere in this comment, trails in use under the current plan provide valuable recreational access, not only motorized recreation, but for transportation to other recreation sites and activities including hunting, climbing, and other popular outdoor sports and activities. We hope to see the existing and potential collaborations between motorized and nonmotorized recreation recognized by the new Forest Land Management Plan.

6. (Section 3.4.1) Elk Ridge Geographic Area

In consideration of the already low road density, previously established restrictions on road development due to wilderness classification, non-roaded ROS class or other restrictions, and the benefits of erosion prevention and the prevention of damage to cultural sites and wildlife habitats which may be brought about by rerouting (and thereby lengthening) roads to avoid sensitive areas, we recommend in concurrence with Ride with Respect and Sage Riders, that the statement, “Road density shall be maintained or decreased,” made in GA-ELK-ST-06, be removed from the draft. We also request that the statement made in GA-ELK-GD-09, “Recreational opportunities and developments should be designed to meet the Primitive or Semi-primitive Nonmotorized recreation opportunity class,” be removed from the draft as this appears to override ROS zoning to the effect of making the entire Elk Ridge Geographic Area non-motorized.

We would like to close by saying we support “shared use.” As long as overall visitation numbers are appropriate for the affected resources, motorized and non-motorized users can be compatible with one another so long as individual users understand designations and plan their activities accordingly. Indeed, motorized and nonmotorized recreation use often overlap as OHV’s often increase accessibility to non-motorized recreational activities such as climbing, camping, etc. We also hold that responsible recreational and other use of public lands can exist in harmony with ecosystem needs. The agency should consider ways to manage Forest and recreation use in such a way that prevents our public lands from becoming places where certain users are excluded based on their culture and recreational preferences and other are not or where land use for a variety of responsible recreationists is unhelpfully hampered. In the revision and implementation of the new Forest Management Plan, we hope to see these lands managed in such a way as to continue and improve the facilitation of the responsible recreation and land use which improves the quality of life for both local citizens and traveling tourists, preserves the land, and creates a management environment that promotes the responsible enjoyment and respect of the Manti-La Sal National Forest’s beauty, resources, and opportunities.

BRC would like to be considered an interested public for this project. Information can be sent to the following address and email address:

Ben Burr
BlueRibbon Coalition



Sincerely,

A handwritten signature in black ink, consisting of stylized initials 'BB' followed by a long horizontal line.

Ben Burr
Policy Director
BlueRibbon Coalition
brben@sharetrails.org