



October 22, 2021

Manti LaSal National Forest
Att: Supervisor's Office
599 West Price River Drive
Price UT 84501

RE: Draft Forest Plan Revision

Dear Supervisor Nehl:

The above Organizations are submitting these comments to the Manti La Sal NF in response to the recent NEPA scoping review process that has been made available August 25, 2021 ("the Proposal"). These comments are being submitted in addition to local input from clubs and are supplementing input from Ride With Respect. The forest contains just a dozen miles of motorcycle singletrack and ATV trail, and it's an hour's drive from Moab (mostly on state trust lands). The motorized community would like to see a loop off the graded roads in the area, which could also help e-bike and non-motorized uses avoid the graded roads. The Manti and Abajo Mountains have more existing motorized-trail opportunities, but even they need new links for consistent loops to handle increased visitation. Increasing this type of resource helps organize travel that's predictable for wildlife and non-motorized uses alike. Such improvements are only approved after environmental review during the travel-planning process that takes place after the RMP revised.

Unfortunately, the draft LMP would block these improvements from even being considered, and it would surely close more of the few trails that remain. For one thing, under Recreation Opportunity Spectrum (ROS) zoning, the draft LMP prevents future planners from considering adding a motorized trail on 50% of the forest acreage (generally all the mountainous parts, while additions could be considered on the mesas). Since 1986, the current LMP has only prohibited consideration of adding a motorized trail on 10% of the forest acreage, yet very-few trails have

been added and many trails have been closed since then. On top of this ROS overreach, the draft LMP implies that Inventoried Roadless Areas (IRAs) shouldn't be managed for motorized trails even though the best trails that the Forest Service currently permits for motorized use are in IRAs. Motorized usage is characteristic of roadless areas, despite the never-ending efforts of some to manage IRA as Wilderness.

What's worse, even though counties like Emery and Carbon share our concerns, others like San Juan and Grand (along with Moab City) have urged the draft LMP to be even more restrictive (see first attachment). They reiterate claims from the Grand Canyon Trust (GCT), which seeks to vastly expand the designation of wilderness, that the GCT's alternative plan is the solution to many problems including climate change. In fact, the GCT alternative would prevent active-management tools like logging that are critical to fixing a century of fire suppression.

The Organizations would like to comment on the variety of public proposals that have been developed to manage public lands in the planning area, and a regional trend in these types of proposals that is simply offensive. Mainly these public proposals seem to consistently be based on the desire of people who have been drawn to the west because of large tracts of lands with access to immediately close these lands to other members of the public. These seems to be driven by the position that use of the exceptional recreational opportunities on these lands by others is now interfering with the use of these lands by the local community. This is ugly and totally unnecessary and should not be the basis for management.

1. Is the desire to confuse and frustrate the public in the plan development process?

The Organizations must express a high level of frustration with the direction the Proposal development has taken. The Organizations have actively welcomed the expanded public engagement process that the Manti and several other forests have chosen to pursue outside the NEPA process as exemplified by the release of the draft Proposal in September of 2020. The Organizations saw this a significant step in engaging the public in a meaningful dialogue about the future of public lands on the Manti. This was exactly the type of dialogue we sought in our

participation in the pre-NEPA release of the RMP on the Manti and with our participation in development of the 2012 Planning Rule and the National Shared Stewardship efforts of the USFS.

After a brief review of the public input that was received in response to the September 2020 release, clearly the public took this opportunity to develop meaningful, thoughtful and high-quality public input both supporting and opposing the Proposal. This Pre-NEPA step sent a strong message to the public about the forests desire to engage with them both now and in the future. This type of message would directly align with the USFS Shared Stewardship efforts and 2016 National Sustainable Trails strategy where the USFS has indicated a serious desire to collaborate more effectively. While these efforts have focused most directly on fire and water issues, these messages are strong and have been embraced by many in the trail's community.

After embarking on a good start on a new direction of public engagement that was obviously well received, the Manti has decided to wait until after the close of scoping to make any alteration on the Proposal. Rather than addressing the volumes of public comment in any manner, no alterations to the Proposal are undertaken at all. If the desire was to make largely token gestures to engage the public, that has been accomplished. This course alteration on public engagement sends a powerful message, that the Organizations are vigorously opposed too. This message is the fact that the Manti sees public engagement as merely an exercise in checking boxes in the NEPA process rather than a meaningful discussion of issues with the public. This is a horribly missed opportunity as the members of the public who chose to engage in a meaningful and thoughtful process in previous efforts but nothing has been done with this information.

We doubt that comments submitted this round will be of the quality provided previously, which is a serious concern in isolation. The Organizations would also note that the cavalier nature of this decision will have impacts both now and in the future. After completion of the RMP development, many of the same members of the public that were indirectly told the process simply seeks to check boxes will be the same public that will be asked to partner with the USFS to address management issues on the Forest. We doubt that discussion will be productive.

An example of the type of innovative collaborative efforts that have occurred even between the close of the last comment period on the Proposal and the release of the August 2021 version of this document would be the two Great Trails Trainings that was put on in partnership between NOHVCC, Utah Parks and Recreation and Ride with Respect. These trainings sought to foster collaboration between users and managers and educate everyone on best management practices and were a significant allocation of partner time and resources. Even with the challenges provided by COVID and many other issues, these free trainings were well attended by Manti/LaSal staff and provide an example of the types of resources that can be developed collaboratively. Clearly the users did not adopt the same mentality that has been exhibited with the Proposal, but rather chose to collaborate and attempt to manage issues. This type of collaboration simply does not develop on its own, but rather must be fostered slowly and thoughtfully. Thoughtless actions such as those now exhibited in this document do not foster these types of relationships. This opportunity was not an expanded public comment period, as public comment processes alter the Proposal. Here that opportunity to revise has been entirely missed.

The ineffective nature of the Manti effort is immediately apparent when the pre-NEPA process of the Manti is compared to the GMUG RMP revision efforts in Colorado. Both the GMUG and Manti chose to embark on the public release of plans prior to the initiation of the NEPA process. This is where the similarities stop, as the GMUG chose to take this public input meaningfully and thoughtfully and make significant revisions to their pre-NEPA plan. While this effort has not resolved all conflict around the GMUG, this effort has resolved many concerns of users prior to NEPA initiation. The GMUG has been applauded by many for this effort. While the GMUG chose to truly collaborate with the public, Manti planners chose to change nothing. The message of this inaction was strong and cannot be overlooked.

2(a). EO 14008 issued on January 27, 2021 by President Joe Biden mandates improved recreational access to public lands.

The Organizations are aware there has been an increase in public concern on issues that are truly a success or are based on partial summaries of large-scale actions that have been taken by the President or Governor. The recent issuance of EO 14008 by President Biden on January 27, 2021 would be an example of a decision that is totally overlooked in the Manti failure to alter their draft in the last year.¹ In direct contrast to the materials we are seeing, this Order had provisions protecting lands generally but also had specific goals of improving access to public lands. §214 of EO 14008 clearly mandates improved recreational access to public lands through management as follows:

“It is the policy of my Administration to put a new generation of Americans to work conserving our public lands and waters. The Federal Government must protect America’s natural treasures, increase reforestation, **improve access to recreation**, and increase resilience to wildfires and storms, while creating well-paying union jobs for more Americans, including more opportunities for women and people of color in occupations where they are underrepresented.”

The clear and concise mandate of the EO to improve recreational access to public lands is again repeated in §215 of the EO as follows:

“The initiative shall aim to conserve and restore public lands and waters, bolster community resilience, increase reforestation, increase carbon sequestration in the agricultural sector, protect biodiversity, **improve access to recreation**, and address the changing climate.”

§217 of EO 14008 also clearly requires improvement of economic contributions from recreation on public lands as follows:

¹ A complete copy of EO 14008 is available here [eo-14008-tackling-climate-crisis-home-abroad.pdf \(energy.gov\)](https://www.energy.gov/eo-14008-tackling-climate-crisis-home-abroad.pdf)

“Plugging leaks in oil and gas wells and reclaiming abandoned mine land can create well-paying union jobs in coal, oil, and gas communities while restoring natural assets, ***revitalizing recreation economies***, and curbing methane emissions.”

The Organizations are aware significant concern raised around the 30 by 30 concept that was also memorialized in EO 14008. While the EO does not define what “protected” means, the EO also provided clear and extensive guidance on other values to be balanced with. From our perspective the fact that the Manti has large tracts currently managed as Roadless and Congressionally designated Wilderness far exceeds any goals for the EO. The Organizations vigorously assert that documents such as Presidential executive Orders are exactly the types of documents that should be addressed in RMP revisions.

2(b) The Goals of the Congressionally mandated USFS National trails strategy must be addressed in the Proposal.

The USFS has been developing the National Sustainable trails strategy for the last several years, to comply with the mandate of the National Trails Stewardship Act of 2016.² The National Trails Strategy clearly identified goal of improving sustainable access and partnerships as a goal of this Congressionally mandated effort. This strategy also sought to strategically change how the USFS looks at partners and sustainability of routes and given the Proposal will guide the sustainable access and partnerships on the Forest for the foreseeable future. The Organizations are commenting on this issue given the fact this effort is simply never mentioned in the Proposal, despite the Congressional mandate. The National Strategy clearly states this as follows:

“Strategic Intent

The strategic intent of the strategy is to embrace and inspire a different way of thinking—and doing—to create sustainable change where grassroots initiative meets leader intent. The combined effort and momentum of many minds and hands will move the trails community, as a whole, toward shared solutions. This

² See, PUBLIC LAW 114–245—NOV. 28, 2016

strategy builds on the many examples from across the country where the Forest Service, its partners, and the greater trails community have successfully embraced a community-driven and locally sustainable trail system model.”³

As we have noted throughout these comments the motorized community has worked hard to develop community driven locally sustainable trail systems on the Manti for decades and even between the pre-NEPA draft and draft versions of the RMP. While the motorized community is far from perfect, the motorized community is the only community that brings significant resources to the Manti to assist with management and maintenance of routes for the benefit of all users. The Utah Parks and Recreation OHV program is a significant trail partner with the Manti and this program is predominately funded from the voluntarily created OHV registration program. This significant direct funding probably makes the motorized trail network the most sustainable on the Manti. These contributions were recently recognized by the USFS planners as part of the sustainable trails effort as follows:

“The engagement and efforts of motorized groups have improved the condition of trails across National Forest System lands and we look forward to continued engagement with the motorized community as part of the Trail Challenge.... During phase one, I welcome collaboration to adequately track, monitor, and acknowledge accomplishments by the motorized community while identifying lessons learned to incorporate into future phases of the Trail Challenge.”⁴

While many interests are struggling mightily to provide a single maintenance crew, the motorized community has provided well equipped and trained crews throughout the state for decades. We believe this is a model of collaboration moving forward and the Proposal should avoid any unintended negative impacts to this collaboration and is rapidly expanding.

³ See, National Trails strategy at pg. 4. A complete copy of the National Trails Strategy is available here: [National Strategy for a Sustainable Trail System | US Forest Service \(usda.gov\)](https://www.usda.gov/national-trails-strategy)

⁴ A complete copy of this correspondence is attached as Exhibit “1”

In addition to the direct funding of USFS management, the sustainability of the motorized community is significantly buttressed by the fact that every route available for usage by the motorized community has been subjected to 50 years of scrutiny under the travel management Executive Orders issued by President Nixon in 1972. While these 50 years have often been challenging for everyone, it has also produced the most analyzed and sustainable trail network for any usage. No other recreational activity on the Forest has been subjected to this level of scrutiny and analysis. The Organizations believe the strategic implications of choosing an alternative that restricts or maintains access to the forest fails to provide that carrot to the users who have worked so hard to date to create a sustainable trails network that aligns with the national efforts. The value of this type of message should not be overlooked, as such a decision would provide a significant message that the USFS is actually changing how they view and achieve sustainability with partners. This type of a strategic carrot is only provided in Alternative C of the Proposal.

3. Substantive comments.

The Organizations submitted 90 pages of substantive comments in addition to hundreds of pages of additional documentation and research as part of our submission to the Manti on January 25, 2021. As these comments are already in the USFS possession, the Organizations are not going to resubmit these documents simply to avoid repetition of efforts and wasting resources. We are submitting these comments as if the submission of January 25, 2021 was reproduced fully in this location.

4. Conclusion.

The Organizations would really urge the Manti planners to set the bar a little higher in future efforts on the Proposal. Asking for public input and then failing to act on the input in any manner sends a strong message to the public. The Organizations vigorously assert this message is wrong both in the short and long term for the forest and efforts throughout the region. This failure to respond stands in stark contrast to the USFS efforts on the GMUG that are revising a forest plan

on the GMUG but taking a VERY different direction for the effort. The Organizations vigorously request that the Proposal be amended to provide public access as mandated in President Bidens Executive Order and as required by the National Trails Strategy.

If you have questions, please feel free to contact either Scott Jones, Esq. at 508 Ashford Drive, Longmont, CO 80504. His phone is (518)281-5810 and his email is scott.jones46@yahoo.com .

Respectfully Submitted,

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