



December 18th, 2020

Ryan Nehl, Manti-La Sal NF Supervisor  
Kyle Beagley, Forest Plan Revision Team Lead  
Manti-La Sal National Forest  
599 West Price River Drive  
Price, UT 84501

Dear Ryan:

We appreciate this extended opportunity to comment on the draft Forest Plan for the Manti-La Sal National Forest. Since some members of the Forest Plan Revision Team are relatively new, let us introduce each organization.

The Castle Country OHV Association (CCOHVA) was established in 1999 specifically to develop the Arapeen OHV Trail System. CCOHVA met monthly to plan the system, then designed the Arapeen map. CCOHVA installed many signs, causeways, bridges, and five traffic counter that they routinely collected data from. In more recent years, CCOHVA repaired Shingle Mill and Hunter's Highway, accruing several-thousand hours of volunteer work in the Manti-La Sal (generally matched by USFS staff). CCOHVA members have several adapt-a-trail agreements with the USFS as well.

Ride with Respect (RwR) was founded in 2002 to conserve shared-use trails and their surroundings. RwR has educated visitors and performed twenty-thousand hours of high-quality trail work on public lands including the Manti-La Sal. Over 750 individuals have contributed money or volunteered time to the organization. RwR has been participating in the Forest Plan revision process since it began in 2004. For your reference, RwR's comments from the past few years are enclosed.

The Sage Riders Motorcycle Club (SRMC) has approximately 100 dues-paying members. Upon development of the Arapeen Trail System, SRMC has participated in several USFS planning efforts and contributed hundreds of hours of trail work. SRMC members have several adapt-a-trail agreements with the USFS as well. They have cleared logs from the motorized singletracks for many years.

The Utah OHV Association (UTOHVA) was established in 2016 to protect responsible OHV riding and access throughout Utah. The UTOHVA also provides a forum for OHV clubs to learn from and support one another,

creating a common voice. Our members include over a dozen clubs that represent different kinds of OHV use. The UTOHVA work with all levels of government to help keep OHV riding safe, fun, and open.

Utah Off-Roaders Alliance (UORA) consists of OHV advocacy groups, government agencies, and businesses to unite the off-road community around common goals, promote responsible stewardship of outdoor recreation areas (education), protect OHV access to those same recreation areas, and support other organizations in the same goals. UORA is a resource for the involved governing bodies to interface with the OHV community. UORA works with the Salt Lake Off-Road and Outdoor Expo (SLOREX) to provide donated booth space at the event for the Forest Service, BLM and other government agencies to interface with the over 18,000 attendees.

Collectively our organizations envision a relatively-modest development of motorized trails in the San Pitch Mountains, Price Ranger District, and Moab District. To enhance existing trail systems, we seek to develop several connector trails in the Sanpete, Ferron, and Monticello ranger districts. Over-snow vehicles are increasingly drawn to all of these districts, representing a great opportunity for tourism and the quality of life for nearby communities.

To establish context, let us point out that the 1986 Forest Plan was reasonable, but the vast majority of Moab's motorized-trail enthusiasts were unaware of the subsequent travel planning until 1991 when the Forest Service closed many road (and singletrack trails, all of which had been open to motorcycling and cleared by motorcyclists with chainsaws that the Forest Service provided in the 1970s and 1980s). The Forest Service didn't actually mark many of the road closures until 2010, leading to some public outcry through 2011, which included campers and hunters who rely on a healthy network motorized routes to access the backcountry.

For decades motorized-trail enthusiasts from the Sanpete Valley to Blanding have tried to constructively address some of the travel-plan deficiencies. We didn't expect to reopen many of the routes or to build a lot of new ones, but we did expect a sort of mitigation effort to enhance the remaining network with short additions, particularly since we self-policed against unauthorized route building or "poaching" the routes that were closed. For decades the Forest Service has told us to wait until a new Forest Plan has been approved, at which point travel planning will begin.

Whether intentional or not, it now appears that "wait until a new Forest Plan has been approved" could essentially mean "wait until it's too late" if this draft Forest Plan is not revised, as it proposes to severely constrain the future travel planning. As written, the draft would prevent planners from being able to consider many options that would meaningfully address motorized access, both the traditional forms like motorcycling and jeeping that have been hobbled for thirty years and the growing forms like e-biking and camping by car or RV. To ensure equal footing for motorized recreation, travel planners will need to start with an ample range of options. Most of those options will be eliminated through the travel-planning process, which is why it's key to start with a new Forest Plan that isn't so much more restrictive than the current one.

Also let us point out the millions of dollars that Utah collects from OHV registrations every year, which is now available for the construction and maintenance of motorized routes. RWR is committed to directing these funds and other OHV support to the Manti-La Sal so we can help to build new trails along with caring for the old ones.

This partnership hinges on robust travel planning, although we accept that the process will occur within reasonable parameters of the Forest Plan. Yet it is only during travel planning that specific routes are considered for specific uses, so it's critical for the Forest Plan to leave sufficient latitude. To that end, please revise your draft in the following ways:

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

(FW-WETLAND-ST-01) "To protect groundwater-dependent ecosystems and wetlands, new road and trail development shall not be authorized."

Since groundwater-dependent ecosystems dissect the planning area, this statement is too strict, and should be followed with the caveat "...except to cross them in sustainable locations." This caveat would make the statement consistent with the rest of the draft Forest Plan, including (FW-ACCESS-GD-2) "New roads and trails should be located outside of riparian areas and only cross them in sustainable locations."

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

(FW-REC-DC-03) "Dispersed recreation sites are available in desirable locations, managed to reduce the risk of social and environmental impacts, and compatible with the recreation opportunity spectrum setting and current travel management plans."

(FW-REC-ST-04) "Recreation facilities and trails shall be consistent with the recreation opportunity spectrum class designations and specialized plans, including but not limited to wilderness, scenic byway, and trail management plans."

(FW-ROS-DC-05) "Motorized route density in the Semi-Primitive Motorized classes averages 1.7 miles per square mile or less to provide for wildlife security."

(FW-ROS-ST-01) "New motorized roads and trails shall not be located within the Semi Primitive Nonmotorized and Primitive classes. Existing motorized roads and trails in these classes shall be considered for closure in Travel Planning."

(FW-ROS-ST-02) "New motorized roads and trails shall be located within the Roaded Natural and Semi-primitive Motorized classes."

(FW-ROS-GD-01) "Recreation management activities at developed and dispersed recreation sites should be consistent with desired recreation opportunity spectrum development levels."

The above statements clearly indicate your agency's intention to make non-motorized ROS zones entirely non-motorized in summer. (While snowmobile access may be allowed in winter, it relies on motorized trails as corridors to cross forested land, so non-motorized ROS zones often wind up blocking snowmobile travel.) This definition of non-motorized ROS zones as exclusively non-motorized is a departure from traditional definitions that allowed motorized routes to be present in a limited fashion. RWR is prepared to accept the new definition provided that most of the forest remains in a motorized ROS zone. After all, even the motorized zones typically have a low density of designated routes, so motorized access is limited to less than 1% of their acreage. In other

words, motorized zones are 99% closed to motor vehicles as far as the footprint of designated routes, and non-motorized zones are 100% closed to motor vehicles. Therefore most acres of the Forest should have an ROS zone that is motorized even though they're unlikely to have an actual motorized route.

Please see the attached maps of GIS data that your agency provided to easily compare the draft ROS zones to the current ones. The current ROS zones place less than 10% of the Forest acres in non-motorized zones (i.e. Primitive or Semi-Primitive Non-Motorized), with the rest in motorized zones (i.e. Semi-Primitive Motorized, Roaded Natural, or Rural). In contrast, the draft Forest Plan would place 50% of the Forest in non-motorized zones, and many of those acres are adjacent to motorized routes (even some segments of improved roads).

Most of the proposed non-motorized zones are in alpine / spruce / fir / aspen forests, while motorized zones are in ponderosa / pinyon / juniper woodlands. For example, other than the area immediately surrounding graded roads, virtually all of the Moab Ranger District above the 8000' elevation is proposed to be 100% non-motorized. It would prohibit a motorized trail from being planned in the truly forested part of the Moab Ranger District despite that many Moab residents are motorized-trail enthusiasts seeking a summertime respite from the heat.

The proposed ROS zone boundaries should generally follow the current ROS zone boundaries, which have been in place from 1986 through the present day. We don't expect the current ROS zone boundaries to greatly increase motorized recreation opportunities, as motorized access has actually decreased since 1986. The proposed ROS zone boundaries would prohibit future options from even being considered across the majority the Forest (including potential realignments / reroutes on hundreds of miles of motorized routes, the development of a singletrack for motorcycle or e-bike use, and the construction of a short road to link two spurs or to develop a campground). Generally following the current ROS zone boundaries would leave flexibility to the extent that the many other layers of management allow.

### 3. (Section 2.10.3) Access

(FW-ACCESS-DC-07) "A mix of motorized single-track, 50-inch, and 66-inch wide trail opportunities provide for a diversity of users and vehicle types, as well as different levels of challenge in a variety of terrain and conditions."

(FW-ACCESS-GD-09) "Motorized trails should be built no wider than 66 inches, unless necessary to mitigate other resource impacts or user safety."

The first statement should include full-size 4WD trails so that it reads "A mix of motorized single-track, 50-inch, 66-inch wide, and full-size 4WD trail opportunities provide for a diversity of users and vehicle types, as well as different levels of challenge in a variety of terrain and conditions." The Forest currently includes full-size 4WD trails such as Dory Canyon (#969), and they are an important part of the mix.

The second statement should be removed because deciding how wide to build a trail should not be done in a preemptive or blanket fashion, rather through the transparent and thorough process of travel planning.

#### 4. (Section 3.1.1.) Wilderness Areas

(GA-WILD-ManagementApproach-02) "Routinely monitor the Peavine Corridor in Dark Canyon Wilderness to determine if use is affecting adjacent wilderness character, causing user conflicts, or affecting resources within the corridor. When unacceptable impacts are occurring, and cannot be addressed, consider closing or restricting use."

While the USFS is welcome to lean on its partners for education and maintenance projects to ensure sustainability of the Peavine road, the agency should not plan to close or restrict this route for the sake of adjacent wilderness character. The Dark Canyon Wilderness was established by the Utah Wilderness act of 1984, which states:

"PROHIBITION ON BUFFER ZONES SEC. 303. Congress does not intend that designation of wilderness areas in the State of Utah lead to the creation of protective perimeters or buffer zones around any wilderness area. The fact that nonwilderness activities or uses can be seen or heard from areas within the wilderness shall not, of itself, preclude such activities or uses up to the boundary of the wilderness area."

As for user conflicts and impacts on other resources, these concerns are already addressed by GA-WILD-GD-02, "Management actions along the motorized Peavine Corridor should minimize user conflict and reduce impacts on soil, watershed, vegetation, and other resources." Therefore the above statement should be removed from the draft.

#### 5. (Section 3.1.9) Inventoried Roadless Areas

(DA-IRA-DC-02) "These areas provide recreational opportunities for nonmotorized users all year long. This is reflected in recreation opportunity spectrum classes Primitive and Semi-primitive Nonmotorized."

The above statement should include trail-based motorized uses so that it reads "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." Many Inventoried Roadless Areas (IRAs) contain motorized trails (including ones that are currently designated for motorized use, ones that were historically motorized, and some potential for new ones that are suitable to the given location). The 2001 "Roadless Area Conservation" rule did not intend to affect current motorized trails or new ones, nor to close the current roads, only to prevent new roads from being constructed in IRAs.

#### 6. (Section 3.4.1) Elk Ridge Geographic Area

(GA-ELK-ST-06) "Road density shall be maintained or decreased."

The Elk Ridge Geographic Area spans a couple hundred-thousand acres, and roughly half of the Monticello Ranger District. The road density in this area is already low, and making it lower will not necessarily improve resources such as cultural or wildlife. In fact, capping the road density would prevent rerouting a road to avoid

cultural sites or wildlife habitat since roads tend to be lengthened by reroutes, especially ones to reduce erosion caused by steep and sustained grades. Capping the road density would also hamper the designation of campsites, especially when campsites are clustered for proximity to a toilet, which often calls for a short loop road to be developed. Therefore the above standard would hamper implementation of GA-ELK-ST-06, "Road corridor dispersed camping shall occur in designated sites only..." Further the above standard is made redundant by other standards such as GA-ELK-ST-17, "New roads or motorized trails shall only be designated if they do not create direct or indirect impacts on cultural resources." Finally, road development is already prohibited in the majority of this area by virtue of being wilderness, an IRA, or non-roaded ROS class. Therefore the above standard should be removed from the draft.

(GA-ELK-GD-09) "Recreational opportunities and developments should be designed to meet the Primitive or Semi-primitive Nonmotorized recreation opportunity class."

The above guideline appears designed to override ROS zoning, and to effectively zone the entire Elk Ridge Geographic Area as non-motorized. It would undermine the purpose of ROS zoning. It's inappropriate for a non-motorized zone to effectively cover such a large area (i.e. the southwest half of the Monticello Ranger District) that currently has a spectrum of recreational opportunities. Providing this spectrum is the purpose of ROS, so it should not be undermined, not even by a guideline that is merely incremental. Assuming that the new forest plan lasts as long as the current one, such a guideline would slowly but surely erode the variety found around Elk Ridge. Therefore the above standard should be removed from the draft.

These revisions would enable the subsequent travel planning to give due consideration to all forms of recreation along with the other Forest resources. Thank you for attending to this matter.

Sincerely,



Wayne Pahl  
Registered Agent & Board Member  
Castle County OHV Association



Clif Koontz  
Executive Director  
Ride with Respect



Wade Allinson  
Southeastern Utah Public Lands Rep.  
Sage Riders Motorcycle Club

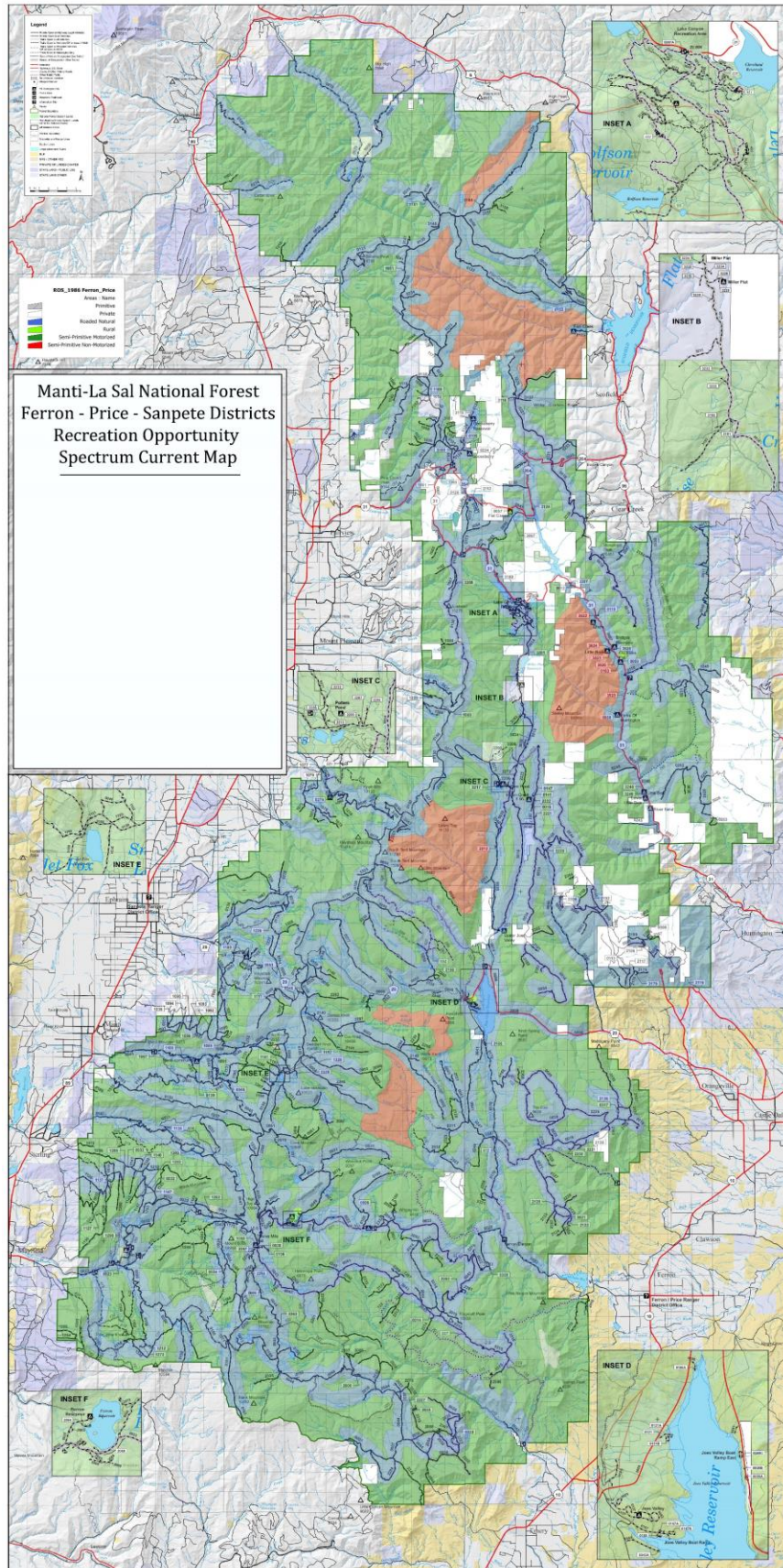


Steven Hawkins  
Chairman  
Utah OHV Association



Phil Rawlings  
President  
Utah Off-Roaders Alliance



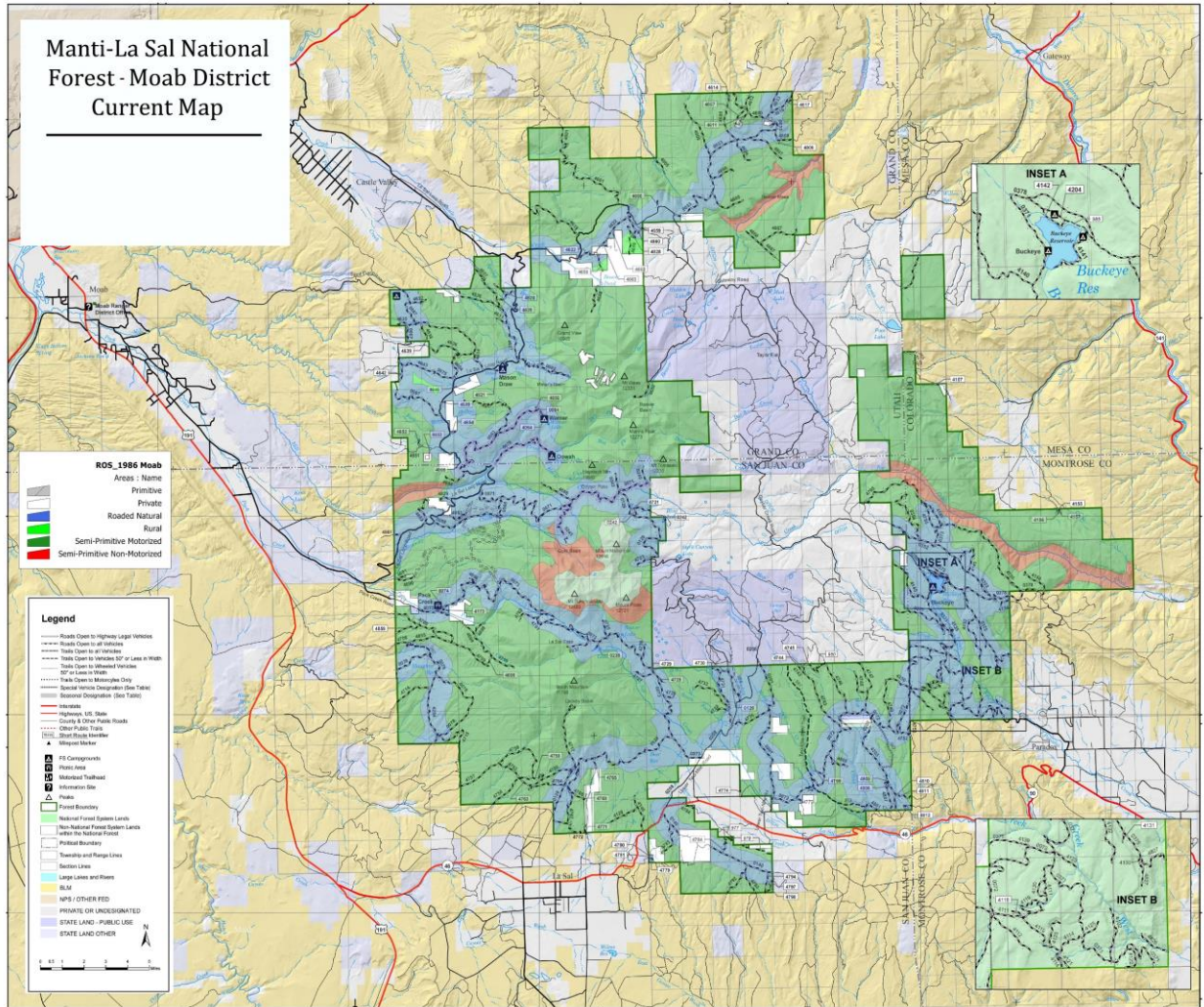






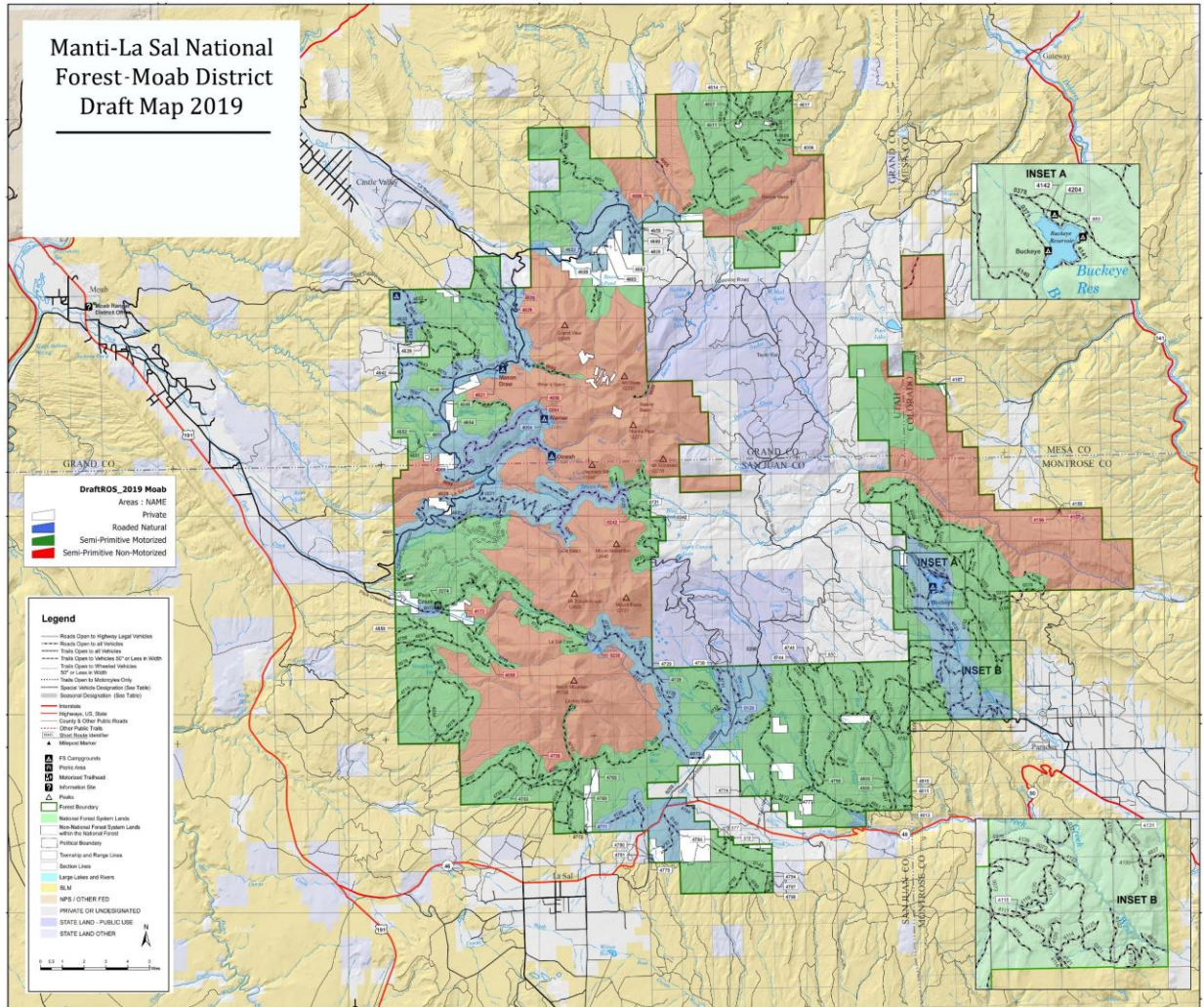


# Manti-La Sal National Forest - Moab District Current Map

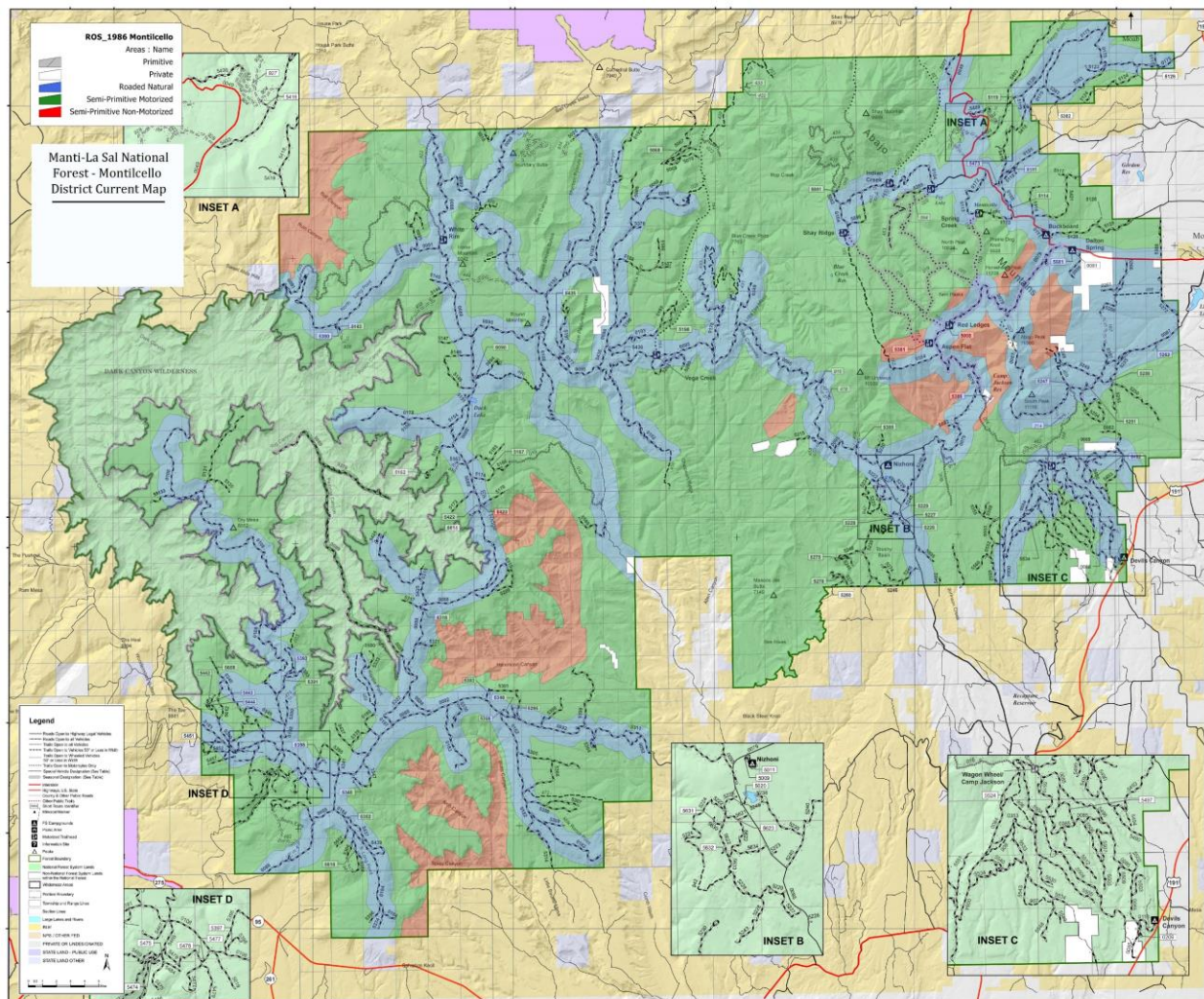




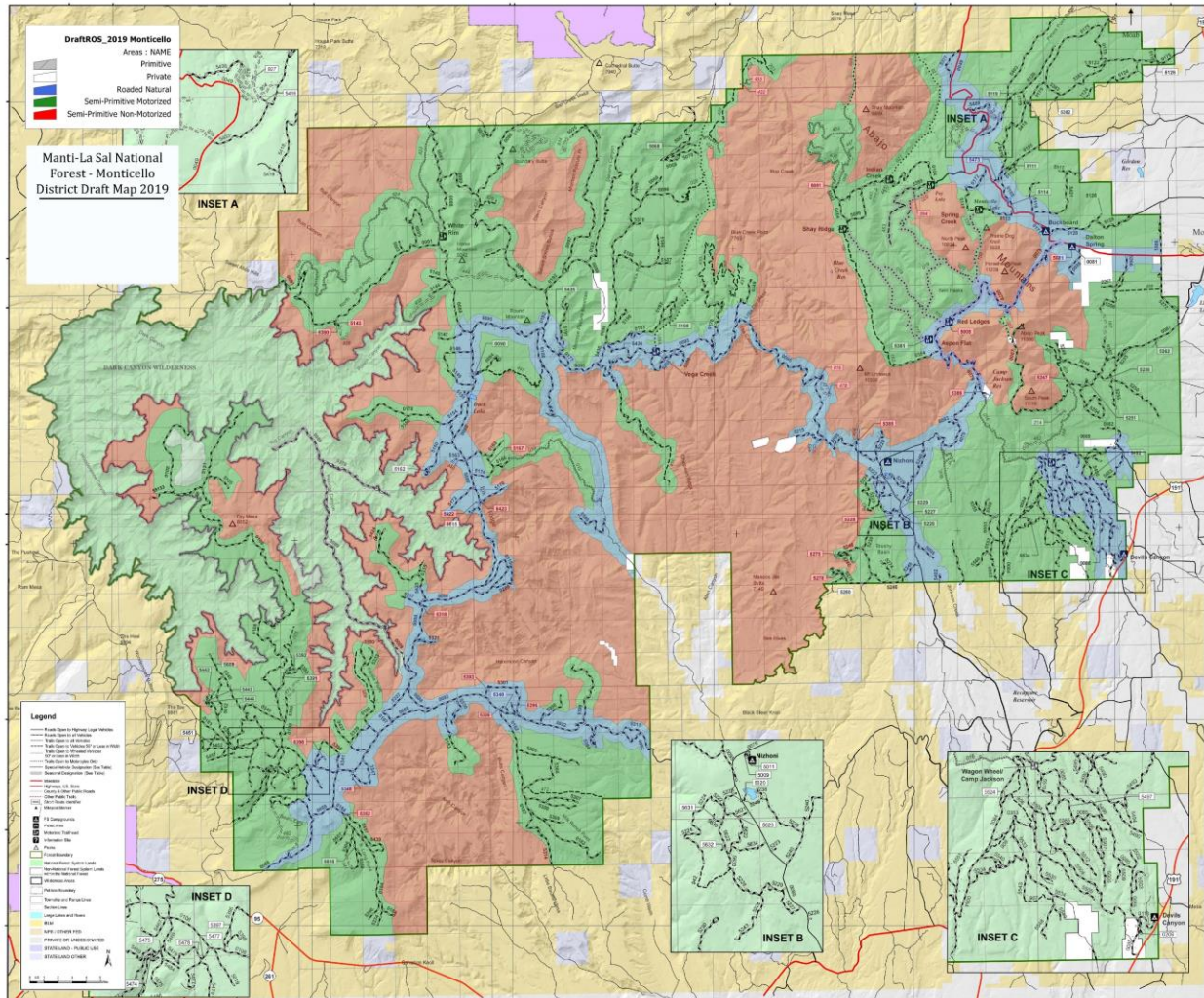
# Manti-La Sal National Forest-Moab District Draft Map 2019



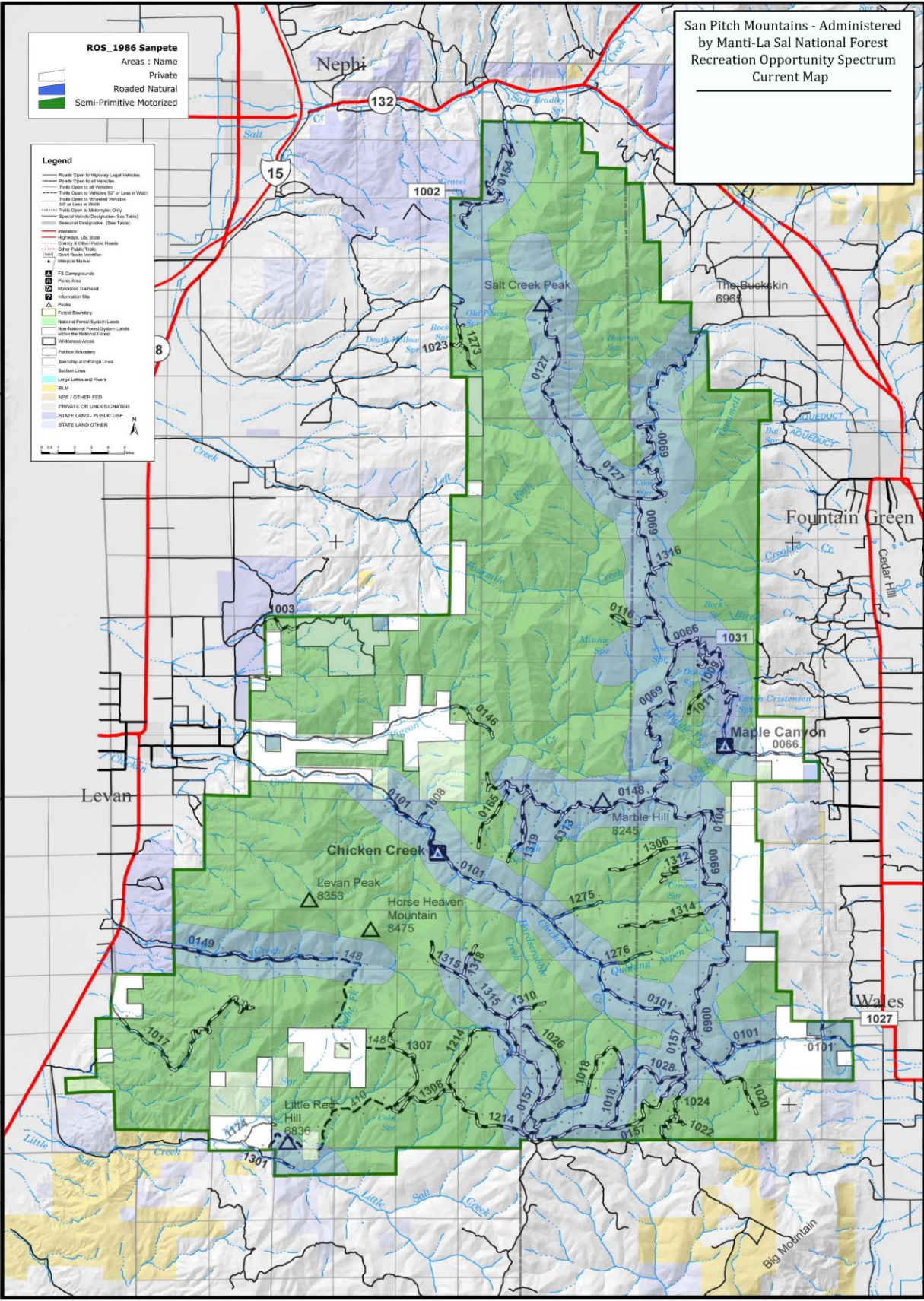










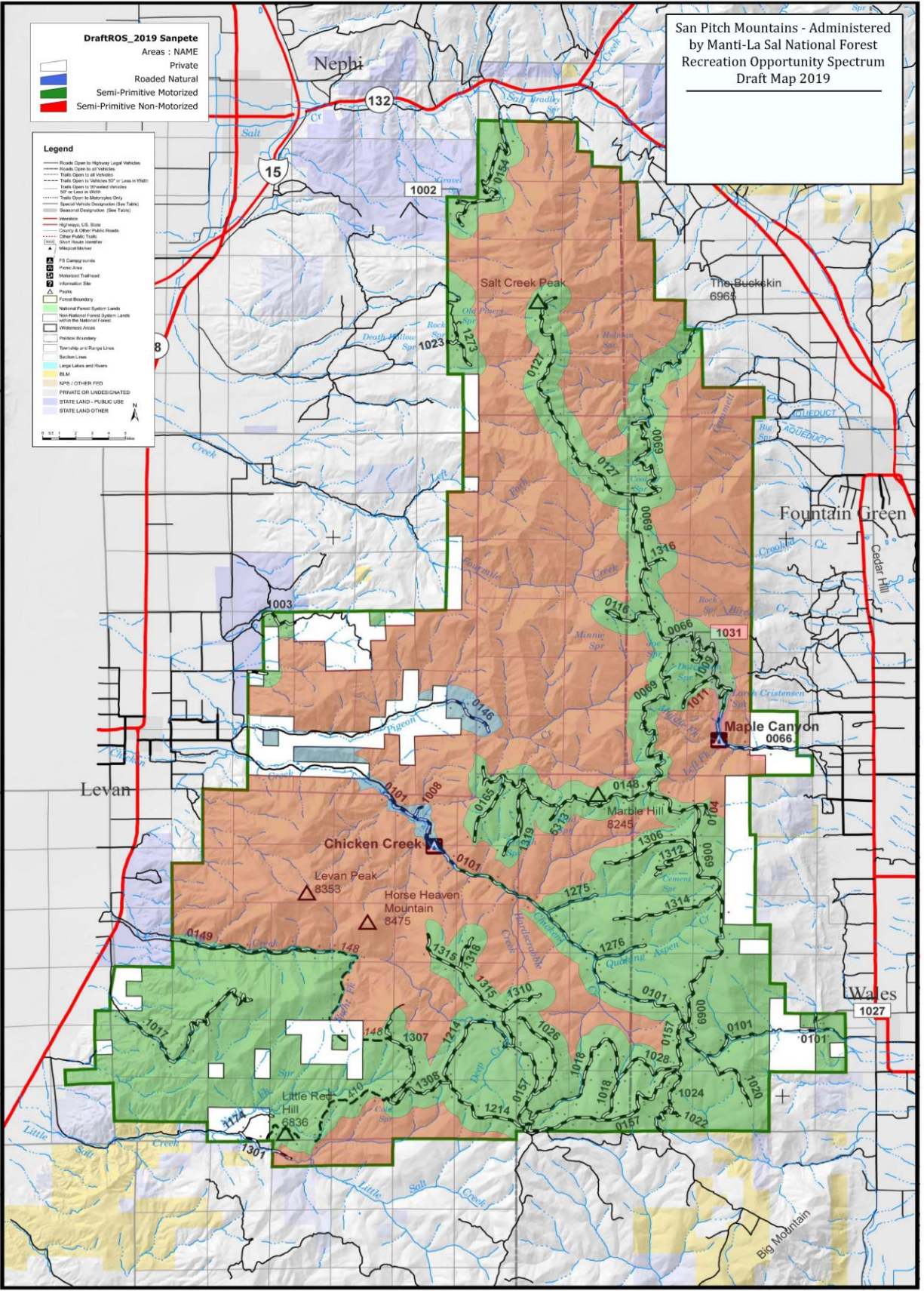


**ROS\_1986 Sanpete**  
Areas : Name  
Private  
Roded Natural  
Semi-Primitive Motorized

- Legend**
- Roads Open to Highway Legal Vehicles
  - Roads Open to all Vehicles
  - Roads Open to all Vehicles
  - Trails Open to Vehicles 8' or Less in Width
  - Trails Open to Vehicles 8' or Less in Width
  - Trails Open to Motorcycles Only
  - Special Vehicle Designation (See Table)
  - Seasonal Designation (See Table)
  - Interstate
  - Highway, U.S. State
  - County & Other Public Roads
  - Other Public Roads
  - Short-Route Connection
  - Interchange
  - FS Campgrounds
  - Public Area
  - Motorist Trailhead
  - Information Site
  - Peaks
  - Forest Boundary
  - National Forest System Lands
  - Non-National Forest System Lands
  - National Forest System Lands
  - Wilderness Areas
  - Private Boundary
  - Township and Range Lines
  - Section Lines
  - Large Lakes and Rivers
  - BLM
  - AWC / OTHER FED
  - PRIVATE OR UNDESIGNATED
  - STATE LAND - PUBLIC USE
  - STATE LAND OTHER

San Pitch Mountains - Administered  
by Manti-La Sal National Forest  
Recreation Opportunity Spectrum  
Current Map





**DraftROS\_2019 Sanpete**  
Areas : NAME  
Private  
Roaded Natural  
Semi-Primitive Motorized  
Semi-Primitive Non-Motorized

- Legend**
- Roads Open to Highway Legal Vehicles
  - Roads Open to all Vehicles
  - Roads Open to all Vehicles
  - Trails Open to Vehicles 50' or Less in Width
  - Trails Open to Motorized Vehicles
  - 50' or Less in Width
  - Trails Open to Motorized Only
  - Special Vehicle Designation (See Table)
  - Seasonal Closures (See Table)
  - Intersect
  - Highway, U.S. Route
  - County & Other Public Roads
  - Other Public Roads
  - Short Route Indicator
  - Intersect
  - FS Contour Interval
  - Private
  - Private Boundary
  - National Forest System Lands
  - Non-Federal Forest System Lands
  - Wilderness Areas
  - Private Boundary
  - Township and Range Lines
  - Section Lines
  - Large Lakes and Rivers
  - BLM
  - NPS / OTHER FED
  - PRIVATE OR UNDESIGNATED
  - STATE LAND - PUBLIC USE
  - STATE LAND - OTHER

San Pitch Mountains - Administered  
by Manti-La Sal National Forest  
Recreation Opportunity Spectrum  
Draft Map 2019





Ride with Respect  
395 McGill Avenue  
Moab, UT 84532  
435-259-8334  
501(c)(3)

November 9th, 2018

Ryan Nehl, Manti-La Sal NF Supervisor  
Tami Conner, Forest Plan Revision Team Lead  
Manti-La Sal National Forest  
599 West Price River Drive  
Price, UT 84501

Dear Ryan:

We appreciate the opportunity to comment on the drafts of your Forest Plan Revision documents entitled "Management Area and Geographic Area Descriptions" and "Desired Conditions and Objectives." Thank you for the work that went into these documents, and the fact that they aim to provide diverse recreation opportunities, including motorized singletrack and ATV trails.

Our comments are an addition to the meeting we had with Mike Diem and Brian Murdock on 10/31/2018 and the comments made by several Ride with Respect (RwR) members who attended the Moab open house on 11/1/2018, along with Steve Salisbury of the American Motorcyclist Association. RwR didn't notify its members of this open house until the day of the event, just as we did on the day of the USFS's Moab open house in July of 2017, when over twenty-five motorcyclists attended in support of RwR's proposal for a motorized singletrack to connect Moab with the OHV trails on state land around Upper Twomile Canyon (which we refer to as the Brumley-Twomile Motorcycle Loop). We hope this turnout constructively conveys the local demand for motorized singletrack in the Moab District.

To that end, we hope that the Forest Plan will call for more than updating the MVUM annually. We request that it recognize the complete lack of motorized singletrack in the Moab District, and nearly so regarding ATV trail as well. We seek trail that is (a) primitive, (b) challenging, (c) flowing, (d) located in a forested setting of at least 8,000' in elevation, and (e) connective with existing trails to provide consistent loops that avoid improved roads. The Forest Plan could explicitly set out to consider developing a Brumley-Twomile Motorcycle Loop with assistance from RwR, segments of which would benefit mountain biking (such as around Geyser Pass) and ATV riding (such as around Brumley Canyon). See our 2017-07-20 comments for the map of proposed routes, rationale of their location, and highlights of 18 benefits. Alternatively the Forest Plan could set out to initiate a Moab Motorized Trail Plan in the same way that USFS developed a Moab Non-Motorized Trail Plan in 2011.

On a smaller scale, connectivity is needed in the Monticello District to refine the existing network of motorized singletrack and ATV trail, which RwR has spent a couple-thousand hours improving primarily via realignments and reroutes with USFS. An ATV trail is needed to connect the eastern (High Peaks) area with western trails like Vega Creek singletrack and Maverick Point ATV trail that are currently isolated (unless one rides on Highway 95 all the way up to Dugout Ranch and then along North Cottonwood Creek, all of which is in the new Indian Creek Unit of Bears Ears National Monument). Adding this single link (which may utilize a historic route such as Shay Mesa or Hop Creek) would make the existing OHV trails more useful. In both districts, the common need is connectivity between the existing trails that is not on improved roads since we ride for recreation, not just

transportation. Since RWR continually volunteers to make and maintain trails that are sustainable, these links would serve other emerging types of use such as e-biking.

Your draft documents include good concepts such as adapting to emerging recreational technologies. However we question the need for designating a Moab Geographic Area (MGA) and a Blanding/Monticello Municipal Water Supply Management Area (BMMA). The areas within these boundaries do not seem sufficiently distinct from the rest of their districts. The designations seem like an unnecessary layer of bureaucracy. That said, if the designations were to commence, then the BMMA description should include the importance of trails for motorcycle and ATV use. In fact, this use should be listed under "Management Approach" as an objective second only to water. Likewise, if the designations were to commence, then the MGA description should include the fact that OHV use is increasing there.

Regarding over-snow vehicles, your draft documents should include the fact that use is increasing, which helps to convey the value of developing a winter recreation MVUM.

Finally we'd like to mention that Utah State Parks is developing a state OHV grant program that is at least five times larger than the federal (RTP) funds currently available for motorized projects. This major expansion will help RWR, other partners, and the USFS itself to enhance OHV opportunities in the face of declining agency budgets. To keep your options open for future OHV projects considered during the life of this Forest Plan, we hope you will incorporate our points into the various components of your current drafts.

Sincerely,



Clif Koontz  
Executive Director







Ride with Respect  
395 McGill Avenue  
Moab, UT 84532  
435-259-8334  
501(c)(3)

July 20th, 2017

Mark Pentecost, Manti-La Sal NF Supervisor  
Blake Bassett, Forest Plan Revision Partnership Coordinator  
Manti-La Sal National Forest  
599 West Price River Drive  
Price, UT 84501

Dear Mark:

We appreciate the opportunity to comment on the draft of your Forest Plan Revision Assessment Report, this time as a follow-up to your Open House meetings last week.

At the Monticello meeting, we were pleased to see SPEAR and San Juan County representatives supporting improved connectivity of the existing OHV trail system in the Abajo Mountains.

At the Moab meeting, over twenty-five motorcyclists attended in support of RwR's proposal for a motorized singletrack to connect Moab with the OHV trails on state land around Upper Twomile Canyon. Unlike last year's DOI listening session in Bluff, where many monument advocates were provided long-distance transportation, lodging, and meals, RwR provided nothing to motorcyclists other than an email notification on the same day that you held an Open House in Moab. Our point was to show motorcyclists the importance of participating in public-lands planning, and to show the USFS that there is a great need for OHV trails in the Moab District of Manti-La Sal National Forest.

We hope that the Forest Plan will recognize this need, and ideally resolve it during the four-year planning period. If this is not possible, then the Forest Plan should at least direct and prioritize a Moab Motorized Trails Project, just as it developed a Moab Non-Motorized Trails Project from 2011 through 2013. Generally, we were impressed by your agency's work on the non-motorized trails plan, and feel that a motorized trails plan is even more greatly needed. It's actually been needed for over a quarter-century, but now more than ever.

At minimum, the Forest Plan revision should ensure adequate discretion to plan for motorized trails in the near future. For example, RwR's proposed Brumley-Twomile motorcycle loop skirts the edges of three IRA's (South Mountain, Mount Peale, and Horse Mountain-Manns Peak). Considering that existing routes like Carpenter Basin were constructed and used as roads, these IRA boundaries should be trimmed. Alternatively, they should include language that clearly accommodates motorized trails, since this is consistent with current policy. That way, future planners are not hobbled by blunt IRA classifications and boundaries.

Our proposed Brumley-Twomile motorcycle loop is the culmination of input that RwR has provided since your scoping period of the Forest Plan revision in 2004. Since then we've made a succession of compromises to ensure a viable proposal. Allow us to highlight some of its benefits:

1. Compensate for the 1991 loss of motorcycling access to every singletrack designated in the Moab District.

2. Connect Moab to SITLA's OHV trail system around Upper Twomile Canyon to decrease trailering motorcycles and the associated fuel consumption (as motorcycles are far more efficient than trucks).
3. Increase riding time on trails that provide a sense of flow, challenge, exercise, adventure, scenery, and connection to natural resources, which promotes mental health, physical health, a spirit of community, and support for public-lands conservation.
4. Satisfy rider interests to discourage the blazing of new routes or poaching of trails that prohibit motorcycling, even though the vast majority of them had accommodated motorcycling for decades prior to 1991.
5. Modestly boost local tourism during the summer lull, as visiting motorcyclists typically spend several-hundred dollars, and many residents choose Moab for its proximity to a spectrum of trail opportunities year-round.
6. Divert traffic from the Pack Creek residential area by establishing a parking area near Brumley Creek (Forest Road 4691).
7. A mile away from the Pack Creek residential area, construct two miles of ATV or UTV trail for many types of OHV use to reach La Sal Pass Road and Pole Canyon in addition to the Brumley-Twomile motorcycle loop.
8. Improve the condition of Carpenter Basin Trail (through RWR's installation of width-limiters at all access points, rolling dips or realignments as needed to reduce erosion, and clearing of the trail each year) to the benefit of all singletrack trail users.
9. Utilize open primitive roads where possible, such as those on the south flank of South Mountain.
10. Where open primitive roads do not exist, utilize closed roads where possible, provided that they can be converted into singletrack trails that are relatively safe, sustainable, and satisfying to all types of trail use.
11. Where closed roads do not exist, RWR's expertise in professional trail design and construction would ensure a high quality of singletrack for all types of trail use.
12. To avoid the Mount Peale IRA, the Brumley-Twomile motorcycle loop could stay on the downhill side of Dark Canyon Road (although trail users would prefer to be on the uphill side).
13. By paralleling Dark Canyon and Geyser Pass roads (preferably with up to a quarter-mile gap), singletrack would be constructed within a corridor that's already impacted by the roads, effectively serving two public needs with one set of environmental impacts.
14. By paralleling Dark Canyon and Geyser Pass roads, singletrack would reduce congestion on the roads, particularly motorcycles that tend to go faster than automobile traffic, and bicycles that tend to go slower than automobile traffic.
15. By paralleling Dark Canyon and Geyser Pass roads, singletrack would help bicyclists link trails like Moonlight Meadows and Trans La Sal.
16. Downhill of the Gold Basin turnoff, singletrack could switch to the south side of Geyser Pass Road to utilize the old Geyser Pass road grade, and to avoid campsites on the north side.



17. While most motorcyclists would utilize Brumley and Dorry primitive roads to complete the loop, the remainder of the old Geyser Pass road grade could be converted into an ATV or UTV trail, allowing OHV riders to park at the base of Geyser Pass Road and then follow this converted trail to reach Brumley and Dorry primitive roads.

18. Given RwR's commitment of professional design, construction, and maintenance, USFS costs would be limited to one-time NEPA planning, with virtually no ongoing burden to the agency.

These benefits are not merely theoretical. RwR has a proven track record of 15,000 hours of physically- and mentally-demanding service work from the Book Cliffs to the Abajo Mountains, which includes fixing up the user-created trails around Upper Twomile Canyon:

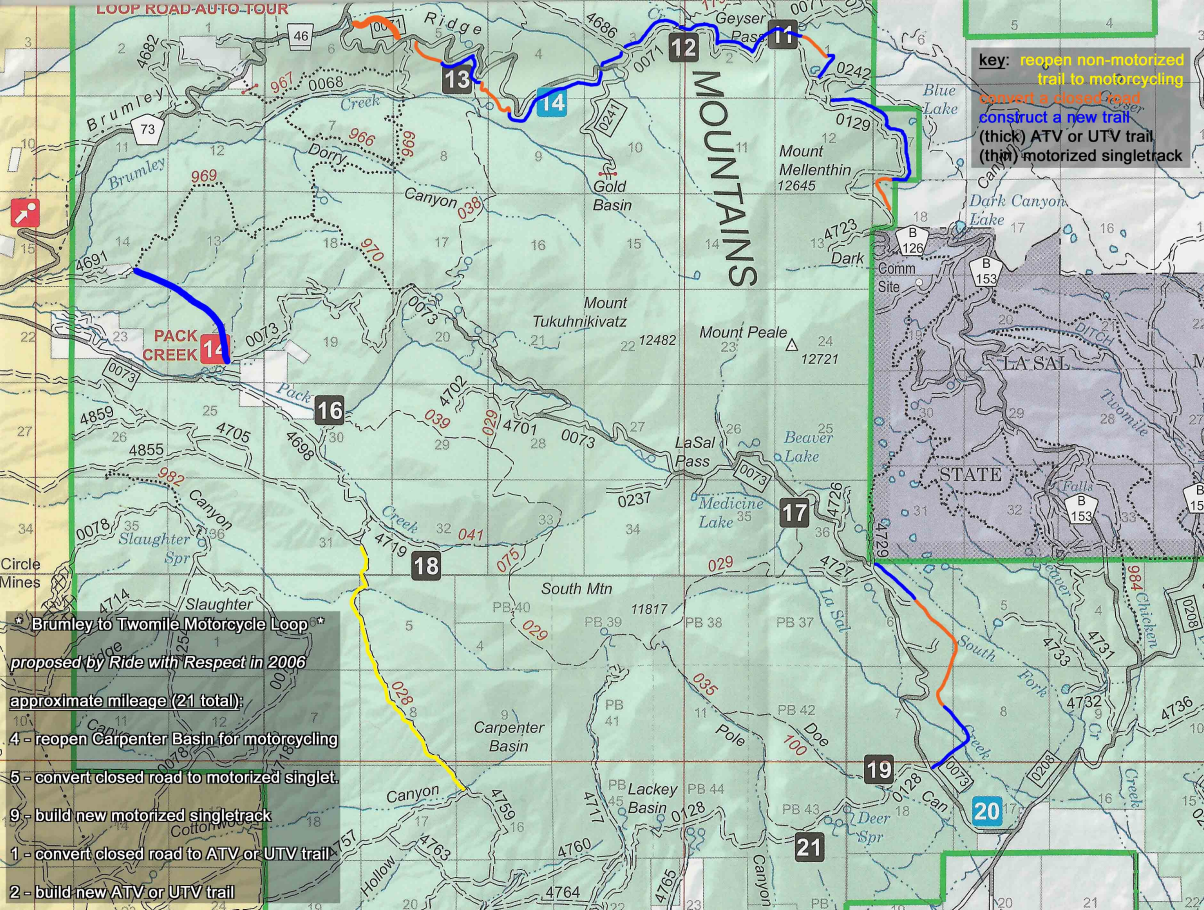
<https://www.youtube.com/watch?v=vFq4p6e1ncw>

In the Moab District of Manti-La Sal National Forest, the spectrum of trails has a glaring gap. RwR is here to help fill the gap with motorized singletrack that's in harmony with other social and natural resources of the La Sal Mountains. We realize that Forest Plan revisions are broad in scope, but they can identify a need for motorcycle trail-riding opportunities, and chart a course for planning. We hope you'll recognize this vision as a potential source of pride among trail users, residents of Grand and San Juan counties, and USFS staff.

Sincerely,

A handwritten signature in blue ink that reads "Clif Koontz". The signature is written in a cursive, flowing style.

Clif Koontz  
Executive Director







Ride with Respect  
395 McGill Avenue  
Moab, UT 84532  
435-259-8334  
501(c)(3)

July 10th, 2017

Mark Pentecost, Manti-La Sal NF Supervisor  
Blake Bassett, Forest Plan Revision Partnership Coordinator  
Manti-La Sal National Forest  
599 West Price River Drive  
Price, UT 84501

Dear Mark:

We appreciate the opportunity to comment on the draft of your Forest Plan Revision Assessment Report. It contains some practical wisdom at a time when the public expects you to do more with less.

For clarification purposes, some parts of the draft imply that the term off-highway vehicle (OHV) is synonymous with the term ATV. While OHV's include ATV's, they also include motorcycles, side-by-sides, and even some full-size vehicles. For all of these vehicle types, the vast majority of operators prefer routes that are scenic, primitive, and rugged. Many ATV riders prefer trails that are 50" wide, while most motorcyclists prefer singletrack. OHV operators tend to happily share trails with other kinds of motorized and non-motorized use so long as those uses don't significantly change the character of the trail or the sense of crowding.

In Chapter 1, the section on motorized recreation concludes:

"New trails constructed since 1986 when the Forest Plan was put into place, include 53 miles of motorized trail, all within the North Zone, 39 miles of non-motorized trails all within the La Sal Loop/Moab Front area of the South Zone, and 27 miles of non-motorized trails on the North Zone. It is projected that future new trail construction will be restricted to key connections forming loops and reconstruction following major disturbances, such as the 2012 Seeley Fire. Emphasis will instead be placed on maintaining and improving the existing trail system and right-sizing the existing system including decommissioning trails or managing them as primitive routes with minimal or no maintenance."

While restricting OHV trail construction "to key connections forming loops and reconstruction" is acceptable in the Abajo Mountains, where a foundation of motorized singletrack and ATV trails is already in place, this restriction is excessive in the La Sal Mountains, which has not provided any singletrack or ATV trails for the past quarter-century (except for Trail 17 around Hideout Mesa, which is relatively far away and sparse in forest canopy). For Moab motorcyclists to reach the very-small Trust Lands Singletrack loop around Upper Twomile Canyon (which SITLA refers to as its South Block), motorized singletrack is greatly needed in the national forest. This loop could utilize some primitive roads that already exist (whether currently designated open or closed), and it would tie into the singletrack currently designated open by SITLA, so in this way perhaps it does fit within the goal of constructing "key connections forming loops." Nevertheless, since this motorcycle loop would require adding at least twenty miles to the current travel plan, it should be specifically prioritized in your Assessment Report.

We apologize if its absence was due to the late arrival of our most recent letter on April 27, 2017. However, at

the district level, Ride with Respect (RwR) has been pursuing the vision of including motorcycling back into the mix of Moab District trails since 2004 when your agency began scoping for the Forest Plan revision. RwR is directly supported by hundreds of motorcyclists who live locally and across the country. Unlike the Manti and Monticello districts, the Moab District's current travel plan does not live up to the USFS multiple-use mission. We have performed a couple-thousand hours of high-quality trail work in the Abajo's, and along with continuing that work, we are willing and able to do all the physical work necessary to establish and maintain a motorized singletrack from Moab to Upper Twomile that's relatively safe, sustainable, and satisfying to motorcycle as well as non-motorized enthusiasts.

Please consider a historical account of our perspective. For decades prior to the current travel plan from 1991, motorcyclists rode and even helped maintain every trail in the La Sal's, as all of them were open to motorcycling (see attached cover of "LaSal Mountain Trail Guide" from 1985 "by Sena Taylor in cooperation with the Moab Ranger District"). In the late 1980's, the USFS quietly planned to prohibit motorcycling on every trail in the La Sal's. Meanwhile, although the agency may have posted a newspaper notice about "transportation" planning back then, motorcyclists didn't realize that this pertained to recreational trails, so they didn't comment. By 1991, when motorcyclists realized what was going on, the district ranger and recreation planner suggested a couple consolations. First, they could leave Carpenter Basin open for motorcycling. Second, they could build motorized singletrack to basically parallel the major roads. Unfortunately these consolations fell by the wayside. The decision to go from 100% open to 0% open created a drastic imbalance that hasn't gone away any more than motorcyclists have gone away from Moab.

During the scoping stage of Forest Plan revision in 2004, RwR proposed to avoid some northern trails that were popular for non-motorized use, but to re-open South Mountain trails for motorcycling since it would avoid social conflicts, by and large. By 2006, after realizing that motorcycling on South Mountain would conflict with the "wilderness" values of people who rarely visited there, we further compromised our proposal to build trail that simply parallels the Geyser Pass and La Sal Pass roads where no "wilderness" characteristics exist, and where other impacts could essentially be consolidated with the nearby pass roads.

Then the Forest Plan revision came to a halt, so RwR focused on the SITLA property around Upper Twomile Canyon where motorcycling and ATV riding had been disorganized for decades. We began using trail maintenance to steer riders away from sensitive, redundant routes and toward more durable ones that formed a singletrack loop with exterior links and an ATV loop with bypasses for full-size vehicles. Thankfully, when SITLA limited the area to designated routes in 2010, the agency included the majority of RwR's proposed loops. That said, with only fourteen miles of designated singletrack, an experienced motorcyclist can ride the loop in less than one hour. We needed more "saddle time" on the trail and preferably less driving time on the highway. Still we appreciate access to these trails since providing recreation opportunities is not SITLA's responsibility, and we faithfully maintain the singletrack and ATV loops in cooperation with the agency. Also we urged motorcyclists to limit trail riding to the SITLA property rather than poaching USFS trails. We assured them that working through the system of USFS planning would return some trail access for motorcycling, rather than simply creating new motorcycle routes and "asking forgiveness" later.

In 2010, when the Moab District began to more closely implement road closures of the 1991 travel plan, they discovered that trails weren't the only imbalance left by that plan. The plan also lacked many short roads that had been in continuous use, some of which probably should not have been excluded from the travel plan in the first place. USFS implementation of these closures was met with quite a bit of local resistance, and it spawned the "Sagebrush Coalition" (see attached newspaper article). Note that RwR still encouraged the public to work with the USFS, and we didn't oppose all of the road closures, but we did hope that the ordeal would increase agency awareness that the Moab District travel plan lacks adequate opportunity for OHV riding, especially



motorcycling.

Apparently the USFS thought that non-motorized trails were more lacking than motorized ones, because in 2011 it initiated a Moab Non-Motorized Trail Plan. During this process, the agency reserved La Sal Pass to be less active commercially and possibly in other ways, so RWR once again compromised our proposal. Instead of paralleling La Sal Pass Road, motorcyclists could simply skirt South Mountain by utilizing Carpenter Basin Trail, which had formed the boundary of an OHV open area only a couple years prior. This request was incorporated in the draft alternatives, but later set aside to be considered by a motorized trail planning process. Likewise, motorized singletrack paralleling Geyser Pass was set aside for future consideration in conjunction with road planning. So, while the Moab Non-Motorized Trail Plan didn't make any headway for motorcycle trail riders, it didn't restrict our prospects, just delayed them further. To some motorcyclists, the agency's final decision indicated that it's better to "ask forgiveness" than to "ask permission" as, for example, the adoption of Burlfriends Trail followed a pattern established by Hazard County and UPS trails. RWR still contends otherwise, but with each passing year it's getting harder to convince our fellow riders to stay on the roads.

Although others have lost faith, RWR will still work constructively with your agency in the Abajo's, and we will still engage with planning in the La Sal's. Our letter from April 27th, 2017 provided an overview of RWR's service work on USFS trails, our suggestions for improving the connectivity of Abajo trails, and our request to avoid additional layers of protection that would block any prospects of establishing a motorcycle loop over the La Sal's. It described the loop's basic location and rationale such as constructing singletrack parallel to graded roads in order to provide trail-like characteristics (e.g. primitiveness, challenge, and flow) and to alleviate congestion on the roads. We'd prefer to route the singletrack a hundred-yards away from the road's edge to create a sense of remoteness, not to mention reducing the potential for short-cutting between the road and trail. Also, although some non-motorized advocates would complain about reopening Carpenter Basin for motorcycling, the fact is that it would benefit all trail uses. Although people who actually use Carpenter Basin would occasionally encounter motorcyclists, the trail itself would be in much better shape. RWR would install 40" width limiters at both ends and many drains in between, plus brushing and logging out the trail each year.

Now we are attaching a sketch showing the approximate locations of this Brumley-To-Twomile Motorcycle Loop (see attached map). It start at Brumley Creek (from the graded road 4691) in order to avoid the residential area of Pack Creek. Then it would follow a new ATV or side-by-side trail for two miles to reach La Sal Pass Road east of the Pack Creek picnic area. (This route ought to accommodate ATVs or side-by-sides so that even more people can avoid the Pack Creek residential area, whether they're ultimately heading up to La Sal Pass or over to Pole Canyon.) Then the route would head south on Pack Creek Road to reach Carpenter Basin Trail. Then simply follow the currently-designated roads past Lackey Basin and Deer Spring. (From there, we'd prefer to stay on the southwest side of La Sal Pass Road to get under forest canopy, but we also understand that this side possesses more "wilderness" characteristics.) Then cross La Sal Pass Road onto new singletrack that would cross a narrow stretch of La Sal Creek, which is upstream of the diversion dam. Once on the northeast side of La Sal Creek, climb up gradually to reach a closed road. (From there, we'd prefer to construct new trail that's designed to maximize both sustainability and satisfaction of all singletrack uses, but if NEPA approval depends on utilizing closed routes, we would gladly make the closed routes work.) The closed road leads nearly to Shepherders Trail (on SITLA property), only having to make new singletrack for the last half-mile or so.

Once north of Dark Canyon (back onto the national forest), utilize a half-mile of closed road, then new singletrack, then the Blue Lake Road, then another combination of new singletrack and closed road that manages to avoid wetlands on its way to Geyser Pass. (From there, we'd prefer to switch to the south side of Geyser Pass Road to stay above the road, but we understand that this side possesses more "wilderness" characteristics.) Then follow new singletrack on the north side of Geyser Pass Road past the fork for Gold Basin.

Where Geyser Pass Road crosses Horse Creek, switch over to more new singletrack on the south side of Geyser Pass Road in order to avoid the winter parking lot and several popular camp sites. Past the hiking trail that leads to Brumley rock climbing, follow a closed road that happens to be the old Geyser Pass Road (which is wide enough to zig-zag a trail for proper drainage of the singletrack). Then cross Trans La Sal Trail and follow new singletrack, still on the south side of Geyser Pass Road. Finally, follow another piece of closed road to reach the Brumley road, which most motorcyclists would use to cross Brumley Creek and Dorry Creek (via forest roads 068, 966, and 969) to complete the loop. Back along Geyser Pass Road, other riders could simply take another piece of the closed Geyser Pass Road to reach La Sal Pass Road. (This route ought to accommodate ATVs or side-by-sides so that their riders can start from the La Sal Loop Road and reach the Brumley Road while avoiding Geyser Pass Road.)

In total, the Brumley-To-Twomile Motorcycle Loop would keep riders occupied all day long while only adding about 21 miles to the current travel plan. Of that, about 4 miles consists of reopening Carpenter Basin for motorcycling, 6 miles consists of converting closed roads to motorized singletrack / ATV or side-by-side trail, and 11 miles consists of constructing new motorized singletrack / ATV or side-by-side trail. Also, of the 21 miles, 19 would be designated as motorized singletrack and 2 would be designated as ATV or side-by-side trail. The parts paralleling Geyser Pass Road would be particularly useful for bicyclists to connect Geyser Pass with Dark Canyon, or connect Moonlight Meadows with Trans-La Sal Trail. Although the USFS would have to assist with NEPA work, RwR would do all of the labor as well as ongoing maintenance. By designing the new routes carefully and strategically zig-zagging within the closed roads, this motorcycle loop can become virtually maintenance-free for the agency, just as the Trust Lands Singletrack is proving to be for SITLA.

In terms of impacts to the local tourism economy, reestablishing some motorcycle and ATV opportunities in the La Sals would benefit Moab during the summer lull, just as snowmobiling and snow biking could help to fill the winter off season. Providing more consistent business throughout the year would make tourism jobs more stable, enabling residents to become rooted, and the community to thrive. That said, these activities would not match the popularity of the Whole Enchilada trail. The Whole Enchilada is exceptional to downhill mountain bikers because it drops over a vertical mile from forest to desert, starting from above tree line and ending at the Colorado River. In contrast, a Brumley-To-Twomile motorcycle loop wouldn't be globally unique, but could draw some of our repeat visitors at a new time of year, and serve local residents who so they don't have to drive 120 miles roundtrip just to do a day ride. By the way, motorcycling from Moab around the Brumley-To-Twomile loop and back to town would consume just a couple gallons of gasoline.

Regarding the economics of your agency, we realize that recreation budgets have shrunk as fire budgets have grown. It seems like fire costs could go way down if the USFS would allow more conservation-oriented timber harvest like SITLA has done around Upper TwoMile Canyon. Also, when fire crews are not responding to fires, they could be helping with trail work. Volunteers through RwR and other groups could be further encouraged to clear logs, especially along motorized trails where it's far more feasible to pack a chain saw. Old trails that are too steep to be truly fixed with "rolling dips" or too saturated to be truly fixed with rock armoring can be rerouted, just as RwR has done in cooperation with USFS staff on several miles of motorized singletrack in the Abajo Mountains. In addition to volunteers, we have accomplished these projects through OHV industry and government grants, all of which are funded by the sale of OHV's, registrations, and fuel-tax revenue. Utah State Parks loans a 50"-wide dozer for work on ATV trails, and they have just been approved to acquire a 30"-wide dozer and 40"-wide excavator for work on motorized singletrack. Suffice it to say, if the USFS plans to improve OHV opportunities in the Moab and Monticello districts, we are ready to help.

Widening ATV trails would improve opportunities for side-by-side drivers, and RwR supports this measure on a case-by-case basis. However the agency should weigh these benefits against the costs to ATV, motorcycle, and



non-motorized users as well as costs to the agency, itself. Other types of trail users prefer the primitive character of narrower trails, and they can have difficulty passing large machines. Side by sides cannot maintain the trail bench on side hills as well as an ATV whose rider can lean uphill. Wider trails require a deeper bench cut and bigger bridges where applicable. The wider tread surface leads to more and faster runoff, which can multiply erosion. Further, side-by-sides are evolving to be as wide as some trucks and SUV's, and modifications make them even wider. Unless a trail is widened to the point of accommodating full-size vehicles, then some side-by-sides will still be excluded. All of the aforementioned issues can be mitigated, but they should be considered before reclassifying a trail. In general, ATV trails that were originally roads are good candidates to be widened. Also the USFS should seriously consider reclassifying short ATV trails that enable much larger loops for side-by-side drivers to more effectively utilize existing roads. Across most forest districts, though, ATV trail and especially motorized singletrack is relatively rare. Therefore, to improve the connectivity of primitive roads for side-by-side enthusiasts, we primarily recommend making several brand-new link trails for this growing segment of forest visitors.

Regarding user conflict, it is key to (a) teach the more conspicuous trail users how and why they should be considerate of the trail's condition and the other user's experience, (b) educate the less conspicuous user that specific routes are shared so that they'll develop the proper expectation, and (c) inform the less conspicuous user that other specific trails exist which are not shared by as many types of use so that they're aware of alternatives where they won't have to share as much. Of course the education depends upon a spectrum of opportunities being available in each forest district. That way visitors can find a trail to meet their needs. Each trail is likely to combine at least two types of use in order to utilize at least three benefits of trail sharing. First, it's efficient in terms of natural-resource impacts, since separate trails lead to double the damage. Second, it's efficient in terms of maintenance, since separate trails lead to double the burden for the USFS and the given user groups. Third, it can facilitate community cohesion, since separate trails isolate segments of the public which can reduce one another's understanding and tolerance. In short, RwR encourages the USFS to resolve user conflicts by providing diverse opportunities (i.e. ROS), informing the public of those options (i.e. ROG), then specifically and persuasively promoting a trail etiquette (i.e. Tread Lightly).

We have enjoyed working with your staff to maintain many singletrack and ATV trails, and we look forward to helping refine your travel plan for the La Sal's as well as Abajo's. Doing so depends upon a new Forest Plan that directs the agency and its partners to complete loops for motorcycling, ATV riding, and side-by-sides or full-size vehicles. In the long run, working together on these projects will be the most cost-effective way to reduce social conflicts and natural-resource impacts while fostering a sense of stewardship on public lands.

Sincerely,



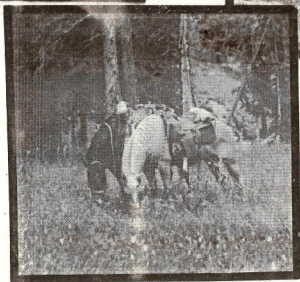
Clif Koontz  
Executive Director

*LaSal*



*Mountain*

*Trail Guide*



# The Times - Independent

Moab, Utah

Est. 1896

[Home](#) [News](#) [My Moab Times](#) [Blogs](#) [Businesses](#) [Classifieds](#) [Legals](#) [Community](#)[Top Stories](#) [Sports](#) [Business](#) [Outdoors](#) [Lifestyles](#) [Schools](#) [Obituaries](#) [Opinion](#)

articles ▼

## Local residents call for end to road closures on public lands

by Jeff Richards

contributing writer

6 years ago | 3767 views | 1  | 20  |  |  [Subscribe](#)

Former Grand County Commissioner Ray Tibbetts addresses a standing-room only crowd at the Grand Center Monday night, Jan. 11. Photo by Jeff Richards

A standing-room-only crowd of about 300 people gathered at the Grand Center in Moab on Monday evening, Jan. 10, to share their concerns about road closures on public lands.

"Wow, what a crowd!" exclaimed Ray Tibbetts of Moab, organizer of the event, as he welcomed those in attendance. "We're going to call this the road opening party."

Tibbetts, a former Grand County Commissioner, said he decided to stage the meeting after a recent experience where more than 100 people showed up to a meeting to oppose a U.S. Forest Service road closure plan, only to be told that no public comments would be taken.

Tibbetts said he has since met with local officials from the Forest Service and the federal Bureau of Land Management, and that both agencies had representatives present at Monday's meeting, although not in an official capacity.



“We had a sit-down meeting with the BLM and the Forest Service before Monday night’s meeting,” said Tibbetts, who added that he is “encouraged” by the progress that has been made.

Monday night’s event was merely an opportunity for land users to share their views and air their grievances, Tibbetts said.

During the two-and-a-half-hour gathering, more than 40 people spoke. Most of the attendees were from Grand and San Juan counties, but some came from other areas, including Price, Utah and Colorado. Although all who spoke opposed road and trail closures, a variety of perspectives were expressed.

“We’ve got to keep these roads and trails open [for] whoever wants to use them,” said Jack Foy of Moab. “They’re ours – take them back.”

Moab resident Dan Mick, who works as a off-road trail guide, said no more roads should be closed. “People are losing income because roads and trails are being closed around here,” he said. “It’s time that we take back Grand and San Juan counties.”

Moab resident Marcy Shumway said she recently drove up to show her grandchildren the mine where “Grandpa” used to work, only to find that the road had been closed.

A similarly frustrated Kathy Holyoak of Moab said she was “appalled” to see stakes blocking off several trail spurs on one of her favorite roads in the La Sal Mountains. Holyoak said that such roads shouldn’t be closed under the guise of wildlife protection. “We’re more important than the snails,” she said.

“We’re here because we’re angry at what’s taken place. We want our public lands open,” added Kyle Kimmerle of Moab.

Dave Cozzens of Moab encouraged those in attendance to write to their government representatives, and to support organizations and groups that promote responsible recreational land access.

Some of the groups mentioned by name during the meeting include the Utah Shared Access Alliance, the BlueRibbon Coalition, Ride With Respect, and the Red Rock 4-Wheelers.

Pat Holyoak of the Grand County Council also encouraged attendees to write letters to their

elected officials. “We have to take the bull by the horns,” she said.

Current Grand County Council members Chris Baird and Gene Ciarus also attended the meeting as members of the audience.

Cozzens noted that BLM national director Bob Abbey will be at the Utah State Capitol Building in Salt Lake City for a public meeting Friday, Jan. 14, at 2 p.m., and he encouraged land-use advocates to attend that meeting.

“It’s not too late,” said Dale Parriott, an avid motorcyclist, encouraging attendees to stay involved in the planning process. “The folks that work for the government are our friends. They are us, too.”

Jason Parriott, Dale Parriott’s son, said he was encouraged to see various groups of land users, including hunters, ranchers, ATV users, motorcyclists, off-roaders, come together for a common goal. “It’s not just saying that we’re angry, it’s making that anger work,” he said.

Former Moab citizen of the year Carol Hines, 97, urged those in attendance to take action. “Let’s do something about it. They’ll listen to us,” she said.

Other issues addressed included the sovereignty of states, and the efforts of environmental groups.

Rock Smith, field manager for the Moab BLM office, also attended Monday’s meeting. He said the BLM has held numerous meetings with Grand County officials over the past two years regarding the creation and implementation of the BLM’s travel management plan for motorized vehicles, which is part of the BLM’s comprehensive resource management plan.

“This is something that we have been working on with the county council since 2008,” Smith said, adding that the county’s own road plan is aligned with the BLM’s.

Tibbetts, for his part, said he plans to move forward and “keep things rolling.”

“I’m very excited and appreciative to all those who attended, and who are willing to get involved,” Tibbetts said.