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October 25, 2021

Submitted via Forest Service NEPA webform, and by email addressed to
mlnfplanrevision@usda.org

Ryan Nehl, Supervisor
Manti-La Sal National Forest
Attn: Forest Plan
599 West Price River Drive
Price, UT 84501

Re: Scoping Comments Submitted by Ride with Respect, a Utah nonprofit corporation (RwR) and Trails Preservation Alliance, a Colorado nonprofit corporation (TPA) with respect to the Draft Revision of the Manti-La Sal National Forest Land Management Plan (Draft LMP)

Dear Supervisor Nehl,

I represent the above-named stakeholders, RwR, COHVCO and TPA and respectfully submit these scoping comments on their behalf.

Previously Filed Scoping Related Comments

On behalf of each of my clients, I incorporate into this scoping comment by reference as if fully set forth herein, the following previously-submitted documents and their contents, and I resubmit them herewith:

- December 18, 2020 letter to the MLNF Forest Plan Revision Team Lead, Kyle Beagley, from Castle Country OHV Association, Ride with Respect, Utah OHV Association, Sage Riders Motorcycle Club, and Utah Off-Roaders Alliance

- January 25, 2021 letter to MLNF Supervisor Nehl from Trails Preservation Alliance, Colorado Off-Highway Vehicle Coalition, and Colorado Snowmobile Association
- October 22, 2021 letter (submitted October 25th) to MLNF Supervisor Nehl from Trails Preservation Alliance and Colorado Snowmobile Association

On behalf of each of my clients, I also incorporate by reference as if fully set forth herein, the following letter and its contents, and I submit it herewith for the first time:

- October 19, 2021 letter from Ride with Respect to Mary McGann, Chairperson of the Grand County Commission

These comments and other past input and efforts by my clients dating back to 2004, including substantial amounts of trail work done in the MLNF, show that they have an established stake in motorized access planning issues and resources in the MLNF LMP revision process. It is therefore our hope and expectation that MLNF will seriously address the concerns stated in the foregoing documents, and meet often with my clients as you work through these issues in this NEPA process.

Additional Scoping Related Comments

Here in no particular order of importance or priority are my some of my clients' broad scoping concerns:

My clients correctly perceive that the alternative supported by Grand Canyon Trust and Grand and San Juan Counties would effectively impose a regime of no net gain of motorized access miles across the MLNF planning area. Thus, for example, if MLNF wanted to merely make a currently open route climb up a hill more gradually by lengthening it, it would have to close an equal amount of routes by mileage somewhere else in order to meet this policy. This policy is not feasible to say the least, and thus the alternative that forces it falls outside the legitimate scope of the LMP revision process.

The draft LMP correctly recognizes the need to account for increased recreation across the forest in motorized as well as non-motorized forms of recreation. Yet the draft does not go

about this in a sufficient manner. Its scope and breadth needs to be broadened and strengthened to ensure a robust plan of motorized recreation to meet the public's needs.

The draft LMP correctly recognizes the need for new approaches to managing roads and trails infrastructure in the face of limited maintenance funds, given the public's desire to access the forest. Yet the draft does not adequately treat this challenge, such as, for example, embracing maintenance partnerships with motorized recreation support and advocacy groups such as my clients. The USFS can even apply directly for state OHV grants that, over the past three years, Utah has expanded to offer several-million dollars every year. The draft LMP's scope needs substantial broadening to embrace and plan to meet this critical need.

The following value should apply across the board for all alternatives: In cases where Forest budget constraints indicate possible road or trail decommissioning or closure, the Forest should consult not only with local governments to determine their interest in and willingness to fund needed maintenance work, but also consult with credible rider groups such as my clients. Unfortunately some local governments in the planning area have become beholden to extreme special interest groups who are hostile to many existing motorized recreation roads and trails in the planning area. Much of the general public whom those local governments are supposed to represent are left without a voice. Thus the LMP should broaden its scope and strengthen its plan for consulting with not only local governments but private motorized recreation organizations such as my clients.

The travel, roads and trails portions of the draft LMP could be strengthened to provide and allow for effective management solutions taking into account emerging new technology, rapid population growth, and changing demographics with different demands, diversity, and interests. The LMP should provide adequate NEPA cover now, in order to make additional cumbersome and expensive NEPA processes unnecessary later, as such new conditions come along.

The draft LMP gives lip service to providing recreation opportunities that are accessible to persons with disabilities and are inclusive of a culturally diverse population. Yet the details and teeth are lacking, and these values are weighed down by the over-emphasis of non-motorized values and directions pushed by advocacy groups and some of their captured local governments. Motorized routes are recognized as being the primary means by which the disabled and aged and those of different cultures are able to access and enjoy Forest attractions and activities.

Every past and present iteration of the Forest Service Roadless Rule allows each national forest and region the flexibility to adapt the management of certain inventoried roadless areas (IRAs) to be consistent with state government plans for such, including any plans by the State of Utah for identifying and preserving motorized roads and trails in those IRAs. The draft LMP should be broadened in scope to recognize and allow for this.

The draft LMP's rigid changes to current Recreation Opportunity Spectrum (ROS) zoning are problematic for at least three reasons: First, creative planning solutions in unknown future conditions will be difficult under the proposed rigid zone changes. For example, in the future electric power will likely dominate the vehicle and bicycle markets, making such uses entirely suitable in many of the areas that the draft LMP proposes to rigidly re-zone as non-motorized. MLNF needs the flexibility that the current ROS zones provide, to deal with that future uncertainty. Secondly, these areas have not and would not depend on such rigid re-zoning for protection, as environmental review of trail development is onerous and will likely become only more onerous over the life of the LMP. Thirdly, the current ROS zones do not twist the agency's arm like the proposed ones will; rather, they provide the agency with needed discretion to meet the challenges of all issues. For these reasons, we urge revision of the LMP's scope to retain current ROS zoning across all planning alternatives. Such ROS zoning has worked just fine.

Thank you for this opportunity to submit scoping comments.

Submitted this 25th day of October, 2021

BALANCE RESOURCES

/s/ J Mark Ward

J. Mark Ward, President and Legal Counsel

For and on behalf of:

Ride with Respect, a Utah nonprofit corporation

Trails Preservation Alliance, a Colorado nonprofit corporation