

Submitted to Forest Service as part of the 10-25-21 scoping comments submitted by Ride with Respect, Colorado Off-Highway Vehicle Coalition and Trails Preservation Alliance



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October 19th, 2021

Mary McGann, Chair  
Grand County Commission  
125 East Center Street  
Moab, Utah 84532

Dear Mary:

I am very concerned about the commission's draft letter to the U.S. Forest Service (USFS) regarding the Land Management Plan (LMP) revision for the Manti-La Sal National Forest (MLSNF). My concerns include the commission's apparent dismissal of input from the Motorized Trails Committee (MTC), which I currently chair, but I am only representing Ride with Respect (RwR) in this letter.

In August and September of last year, the MTC notified the commission of its top four concerns about the USFS draft plan. The MTC's greatest concern was that the draft proposes to expand non-motorized ROS zones from covering less than 10% of the forest to covering 50% of the forest. "Half" may sound like balance, but non-motorized ROS zones are occupied by motorized routes in 0% of their acreage, while motorized zones are occupied by motorized routes in less than 1% of their acreage, so you can see that even motorized ROS zones would be overwhelmingly non-motorized as they have been ever since the current ROS zones were established in the current MLSNF LMP from 1986. Motorized ROS zones provide managers the flexibility to consider adding a motorized route (including e-bike trails), while non-motorized ROS zones would prohibit such consideration for the life of the LMP, which is twenty years in theory and forty years in practice if the current LMP is any indication. The draft LMP proposes to zone almost all of the Moab district that's over 8,000' of elevation (other than the Geyser Pass and La Sal Pass road corridors) as non-motorized, thereby prohibiting consideration of a new e-bike trail, short motorized trail to link existing routes, or campground loop that would stray from the Geyser Pass or La Sal Pass road corridors above 8,000'. (See the ROS comparison maps at the end of RwR's comments from December 18th.) Such possibilities deserve consideration, and motorized access has slowly and steadily decreased since the current ROS zones were established in 1986, so Grand County should support keeping the current ROS zones just as the USFS planners intended to propose until just a couple of years ago.

The MTC's second greatest concern pertained to Inventoried Roadless Areas (IRAs), which often contain motorized trails (even full-size vehicle trails) that the Roadless Rule never intended to close. The draft LMP implies that all IRAs should be zoned as non-motorized, and the "conservation alternative" (developed by Grand Canyon Trust (GCT) and other groups seeking to vastly expand the designation of wilderness across multiple-use lands administered by the USFS and BLM) dictates that all IRAs shall be zoned as non-motorized, thereby closing many of the best motorized trails across the MLSNF. While it's appropriate to prohibit IRAs from being zoned Roaded Natural, Grand County should support continuing to allow IRAs to be zoned as Semi-Primitive Motorized, as it's needed to maintain truly diverse recreation opportunities.

In September of last year, the Grand County commission resolved to host workshops that would include the MTC before developing its comments on the LMP, but the commission has not done so in the past year.

This past weekend, the commission released its draft comments on the LMP, including the statement "All alternatives that are developed in the DIES stage must fully and completely uphold the provisions found within the 2001 Roadless Area Conservation Rule, and commercial timber harvest and new road construction must be prohibited in these areas." For accuracy, Grand County should acknowledge that the Roadless Rule prohibits cutting, sale, and removal of timber in IRAs, except:

1. For the cutting, sale, or removal of generally small diameter trees which maintains or improves roadless characteristics and:
  - A. To improve habitat for threatened, endangered, proposed, or sensitive species, or
  - B. To maintain or restore ecosystem composition and structure, such as reducing the risk of uncharacteristic wildfire effects.
2. When incidental to the accomplishment of a management activity not otherwise prohibited by this rule.
3. For personal or administrative use.
4. Where roadless characteristics have been substantially altered in a portion of an IRA due to the construction of a classified road and subsequent timber harvest occurring after the area was designated an IRA and prior to the publication date of this rule.

Also for accuracy, Grand County should acknowledge that the Roadless Rule prohibits new road construction and reconstruction in IRAs, except:

1. To protect health and safety in cases of an imminent threat of flood, fire, or other catastrophic event that, without intervention, would cause the loss of life or property.
2. To conduct environmental clean up required by federal law.
3. To allow for reserved or outstanding rights provided for by statute or treaty.
4. To prevent irreparable resource damage by an existing road.
5. To rectify existing hazardous road conditions.
6. Where a road is part of a Federal Aid Highway project.
7. Where a road is needed in conjunction with the continuation, extension, or renewal of a mineral lease on lands that are under lease, or for new leases issued immediately upon expiration of an existing lease.

The commission's draft letter urges the USFS to include the GCT "conservation alternative" in its forthcoming Environmental Impact Statement (EIS), which would require the USFS to analyze the impacts of this alternative in myriad ways. Since "conservation" traditionally refers to a working landscape with a sustained yield and the sustainability of natural resources, the closest thing to a "conservation alternative" is the current LMP from 1986. The USFS draft LMP is more of a 'preservation alternative' in that it would largely abdicate the agency's discretion to develop recreation, let alone other uses of the forest. The GCT alternative essentially directs the USFS to re-wild the MLSNF by managing most of it as de facto wilderness, while the remainder would also be quite restricted but at least open to mechanized activities like mountain biking. This 're-wilding alternative' generally fails to contribute the "reasonable options for management" that the commission's draft letter assures. Here are just three examples:

1. (FW-REC-GD 06) "Reduce or eliminate dead-end motorized routes that invite unauthorized route creation are reduced or eliminated." Since the only dead-end route that doesn't invite unauthorized route creation is a route that ends at the top or bottom of a cliff, this guideline could be a death sentence for all dead-end routes. Fortunately managers can utilize many OHV resources to fence the dead ends, educate, and even enforce compliance.
2. (FW-REC-GD 07) "Roads and trails in each semi primitive motorized ROS polygon should not exceed a density of 1 mile per square mile" Most routes that cross a square mile do so at an angle and with curves, thus exceeding 1 mile in length, so this guideline would essentially dictate that most square miles in Semi-Primitive

Motorized ROS zones would have no routes. This might sound reasonable until you consider that it excludes the area of non-motorized ROS zones, which have a route density of zero miles per square mile, resulting in a forest where access is excessively sparse.

3. (FW-ACCESS-ST 01) "There will be no increase to the combined baseline total road and motorized trail density of the Forest Transportation System at the time of plan implementation in order to protect important watersheds, RMZs, migratory corridors, wildlife habitat, endangered or threatened species, and general forest matrix." This mandate of 'no net gain' might be acceptable if the current LMP didn't already close the majority of motorized routes that existed in 1986. There generally aren't extraneous routes left to close, yet routes would need to be closed in order to meet this 'no net gain' mandate if the USFS wanted to simply reroute a trail in any way that would lengthen it (which is commonly the case when making a trail less steep to avoid erosion or steering a trail away from sensitive resources).

These are just three examples of the additional elements that are unreasonable, yet the commission's draft letter states "We support the recreation and access provisions proposed by the Forest, and urge consideration in the Draft EIS of additional elements proposed in the Conservation Alternative." Most of the GCT alternative is severe and would mire the USFS in analysis, let alone implementation. Nevertheless, if the USFS draft LMP overlooked something in particular, Grand County can urge consideration of specific lines in the GCT alternative without promoting the more extreme aspects.

Finally the commission's draft letter supports wilderness recommendations for the "Southern La Sals; Central La Sals, East; Roc Creek; Mill Creek Canyon, North WSA; North La Sal Peaks; and Beaver Creek." Further, it supports evaluating wilderness at "Mary Jane Canyon, other additions to Mill Creek, Porcupine Rim, and Pinhook" along with "large, bulbous exclusions from the Beaver Creek unit." With possible exceptions like the area currently designated as Mount Peale RNA, the Moab Ranger District of MLSNF should not be recommended or managed as wilderness. The GCT alternative displays these wilderness units on their website (see attached map). These wilderness units would permanently close many primitive roads that have been open for generations, including parts of:

1. Polar Mesa
2. North Beaver Mesa
3. Willow Basin
4. Pinhook Valley
5. South Mesa
6. La Sal Pass
7. Lackey Basin

Note that the La Sal Pass closure would be a half-mile of La Sal Pass Road that's above the talus crossing. It would still allow through-traffic to drive or ride the forest road (western alternate). However it wouldn't allow motorized travelers or bicyclists to cross the talus in a through-going manner.

The wilderness units would severely confine options for any expansion of bicycle trails, let alone e-bike or motorized singletrack. They would place most of the existing bicycle trails in a managerial straitjacket, as most of them would be bordered by wilderness on one or both sides, precluding reroutes. Wilderness designation often hampers fire-prevention and forest-health efforts, as the conditions resulting from a century of fire suppression now require active treatments ranging from prescribed fire to mechanical thinning and logging. Wilderness designation allows for some of these treatments in theory, but often makes it unfeasible in practice. Some of the best wildlife habitat and most firewise forests in the La Sals are on state land where logging has rejuvenated aspen stands. Wilderness designation would actually worsen the situation in most of the La Sals.

The Moab Ranger District could use help in a variety of ways, such as blocking off closed routes, but not by closing more routes that are currently open. The USFS draft LMP sets the stage to close more routes, and the GCT alternative would close many routes, all for virtually no benefit to natural or even social resources. Please recognize what the GCT alternative and the draft LMP would actually do compared to the current LMP. The GCT alternative essentially would re-wild the La Sals at the expense of conservation. Even the draft LMP is beyond the pale in terms of zoning half the forest as 100% non-motorized (while the other half is 99% non-motorized) and making roadless areas trailless as well. Grand County can support most of the draft LMP, but should urge the agency to keep its ROS zones the same, as it best reflects our community's recreation and conservation interests.

Sincerely,

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

Clif Koontz  
Executive Director