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Title:

Comments: Objections (with attachments) filed by Trails Preservation Alliance objecting to Ashley NF Land Management Plan FEIS/DROD and attachments.

Issues and parts of the plan revision to which this objection applies, how the proposed plan revision may be improved, and how the plan revision is inconsistent with law, regulation, and policy.

1. Objection is made to the Recreation Opportunity Spectrum (ROS) definitions and boundaries. We object to how the ROS of the FEIS/ROD, and/or the FEIS/ROD alone:

- * In effect categorically prohibits a motorized route from being in a non-motorized zone;
- * Effectively allows non-motorized zones to cover at least half of the whole planning area, including non-motorized zones that stretch for ten or twenty miles, thereby isolating vast portions of the forest from connection by any kind of motor vehicle in summer;

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- * Massively constrains the options for a subsequent travel planning process to consider, particularly since forest plans are intended to last a couple decades (and sometimes wind up lasting twice that long);
- * Undermines the work of the counties in diligently developing trails master plans by potentially forever prohibiting many of those trails from ever being considered, as overriding desired conditions and contradicting a forest plan for trail development is practically unheard of;
- * Fails to properly plan for the projection of demand for motorized vehicle recreation in the coming decades, including electrification and hybridization with bicycling;
- * Fails to expressly allow exceptions in Semi-Primitive Non-Motorized zoning for a motorized route;
- * Fails to give most of the planning area a motorized zoning designation;
- * Fails to extend motorized corridors far enough to ensure that USFS travel planners will have ample options for the coming decades;

1. The FEIS/DROD is objected to further on the grounds that:

- * It conflicts and is inconsistent with the trails master plans, maps, planned corridors and resource management plans of Daggett, Duchesne and Uintah Counties (including Uintah County's OHV Master Plan as it is a supplement to its Trails Master Plan), all of which is contrary to NFMA, NEPA, Forest Service planning regulations, and NEPA CEQ regulations;
- * Its spoken or unspoken attempt to comply with the so-called 30 x 30 plan is flawed and arbitrary, because 50% of the Ashley NF is already tied up and off limits to motorized recreation as either Wilderness or other special designations that severely restrict OHV use;
- * Its significant motorized travel restrictions are inconsistent with mandates of recent Presidential Executive Order #14008 (January 17, 2021) to "improve access to recreation" and "revitalize recreation economies;"
- * Its significant motorized travel restrictions are inconsistent with the mandates of the Congressional mandated National Sustainable Trails Strategy for the USFS under the National Trails Stewardship Act of 2016, PUBLIC LAW 114-245[mdash]NOV. 28, 2016;

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* It arbitrarily fails to recognize and analyze the fact that the sustainability of every existing motorized trail in the planning area has been subjected to 50 years of scrutiny under the travel management Executive Orders issued by President Nixon in 1972;

* It fails to provide an adequate supply, or the managerial flexibility of supply, of OHV opportunities to meet the current demand, let alone future demand in a sustainable fashion;

* It fails to adequately recognize and analyze how trails can benefit other Ashley NF programs, resources and values, such as by providing remote access for wildfire suppression efforts and fuel reduction/treatment projects;

* It is inconsistent with Federal law to the extent it may be construed to facilitate de facto wilderness designations and management prescriptions, especially in light of the Congressional release of all non-designated Forest Service lands as provided in the Utah Wilderness Act of 1984;

* It is inconsistent with the 2019 Congressional Dingell Act designation for the Ashley Karst National Recreation and Geologic Area, in which recreational usage of the new NRA is specifically identified as a characteristic to be protected and preserved. While the Karst area has restrictions on new route construction there is no restriction on the designation of existing motorized areas in this legislation. Thus we object to the FEIS/DROD failure to preserve existing motorized trails as open route or road designations. The same concerns apply to the Flaming Gorge NRA designation in 1968 and its emphasis given to preserving recreational opportunities;

* Its application of a "Recreation Management Areas" is redundant and sometimes conflicting with ROS, and will cause public confusion and exacerbate the risk of categorically prohibiting motorized recreation;

* It effectively portrays the "Semi-Primitive Non-Motorized" ROS zone as intending to entirely prohibit motorized recreation travel. This would arbitrarily override the desired conditions aspect of such zone expansion, making it easier to claim a NEPA violation of desired future condition ideals if one were to try to open a motorized route in a Semi-Primitive Non-Motorized zone. This long term threat could be accelerated in a hurry, as the FEIS/DROD opens the door for making Semi-Primitive Non-Motorized zones more of an exclusive use rather than merely a non-motorized focus.

Thus the FEIS/DROD poses a clear and present threat to expand these zones over historic roads that all three counties have proposed to reopen for motorized recreation travel. As particularly egregious examples, the FEIS/DROD will convert three areas to become non-motorized ROS zones, despite that all three County trails master plans call for reopening historic roads in those locations. Such historic roads include Heller Lake, Galloway Springs, and Pipe Creek.