

Resubmitted to Manti-La Sal National Forest as an attachment to the 10-25-21 scoping comments submitted by Ride with Respect, Colorado Off-Highway Vehicle Coalition and Trails Preservation Alliance



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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 you 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 Roded 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