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Comments: I appreciate this opportunity to discuss concerns that the motorized users have with the current Forest Service plan. I represent the off highway vehicle community and have been involved in forest service planning projects for over 15 years. Clubs and groups that I represent have provided thousands of volunteer hours on forest service lands.

It is important to recognize that it is imperative in maintaining a viable and sustainable OHV trail system that connector trails are vitally important especially in Emery County where connector routes need more attention and discussion in order to connect our towns and cities with public lands. This will enhance the visitor experience and bring visitor monies to our local businesses.

The forest service is currently operating on a plan that was established in 1986. This plan, despite being 34 years old has been most effective. This plan has met the growing needs and pressure without causing substantial undue restrictions. Based on this plan we do not see the need for a radical change.

We are concerned that as written, the current 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. 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.

We are asking that the current draft be revised in the following:

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."

After reviewing the maps that the forest service provided it is easy to 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, Roded 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. 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 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 3.1.9) 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.

5. (Section 3.4.1) Elk Ridge Geographic Area

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

The road density on the forest 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.