



June 10th, 2024

Bureau of Land Management
Richfield Field Office
150 East 900 North
Richfield, UT 84701

RE: Henry Mountains and Fremont Gorge TMP (DOI-BLM-UT-C020-2018-0006-EA)

Dear BLM Planning Team:

Please accept this correspondence from the above organizations as our official comments regarding the Henry Mountains and Fremont Gorge (HMFG) Travel Management Plan (TMP).

1. Background of Our Organizations

In our comments, the “Organizations” will refer to the following four groups:

Colorado Off Road Enterprise (CORE) is a motorized action group based out of Buena Vista Colorado whose mission is to keep trails open for all users to enjoy. CORE achieves this through trail adoptions, trail maintenance projects, education, stewardship, outreach, and collaborative efforts.

The Colorado Off-Highway Vehicle Coalition (COHVCO) is a grassroots advocacy organization of approximately 2,500 members seeking to represent, assist, educate, and empower all OHV recreationists in the protection and promotion of off-highway motorized recreation throughout Colorado. COHVCO is an environmental organization that advocates and promotes the responsible use and conservation of our public lands and natural resources to preserve their aesthetic and recreational qualities for future generations.

Ride with Respect (RwR) was founded in 2002 to conserve shared-use trails and their surroundings. Since then, over 750 individuals have contributed money or volunteered time to the organization. Primarily in the Moab Field Office, RwR has educated visitors and performed over twenty-thousand hours of high-quality trail work on public lands.

The Trails Preservation Alliance (TPA) is an advocacy organization created to be a viable partner to public lands managers, working with the United States Forest Service (USFS) and the Bureau of Land Management (BLM) to preserve the sport of motorized trail riding and multiple use recreation. The TPA

acts as an advocate for the sport and takes necessary action to ensure that the USFS and BLM allocate a fair and equitable percentage of public lands to diverse multiple-use recreation opportunities.

2. Introduction

HMFG is a huge planning area at the heart of canyon country that's quintessential to southern Utah recreation, containing many motorized trails of great value, with routes traversing from nearly the top of the Henry Mountains to the bottom of the Dirty Devil River. While the scale of the area may make planning feel overwhelming, the scale is part of what makes this network of routes so outstanding. It's critical to fully assess the quantity and quality of routes, as they combine to provide diverse recreation that's only becoming more important in modern life across our nation.

3. The route inventory must be completed in order to reach a sound decision.

Good planning starts with fully documenting the current conditions so that the affects of any alternative can be accurately analyzed. The HMFG route inventory is clearly missing hundreds of miles of existing routes, most of which are primitive roads while others are OHV trails, and most of which have existed for many decades.

Even if an existing route would remain closed in all of the alternatives, it needs to be included in the route inventory to assess things like minimization, particularly since this TMP is intended to redo the TMP from 2008. Most of the missing routes were not inventoried prior to 2008, so they have never been properly analyzed, and this TMP represents the time to give them a fair shake. Nearly all of the missing routes were open prior to 2008, so they should be reconsidered to designate them open or to finally account for the positive and negative effects of their closure.

Missing routes are a major issue across the planning area, all of which should be revisited to complete the inventory, but the organizations will provide six examples:

1. Many primitive roads are missing from the route inventory between North Hatch Wash and Big Ridge (as one can easily see from aerial photos in addition to observation at ground level), including one that connects the bench road (GABD0511) all the way to the Simplot Dugway, providing a tremendous trail experience that is not substituted by the graded road of North Hatch Canyon.

2. Another primitive road in that same vicinity illustrates the personal meaning of many such routes. Specifically it's in the southeast corner of the TLA section that's a couple miles southwest of the Simplot Dugway. As one can easily see from aerial photos in addition to observation at ground level, it gently climbs from the graded road up to the bench and ends at a camp where half a dozen trailers spent half a year building the Simplot Dugway for Kirkwood Oil. One of our members has fond memories of spending the summer of 1980 there despite historic flooding that year, and he would love to visit the camp, but he depends upon motorized access due to his mobility limitations.

3. Several motorized singletracks exist along Skyline Rim and down it (connecting Upper Blue Hills and Lower Blue Hills), providing trail-based motorcycling opportunities through this striking area, which were a prized consolation after open cross-country travel of this area was prohibited in 2003.

4. Wild Horse Canyon Road actually crosses Muddy Creek (from WYNC0011d to WYNC0045c). While it may be obscured by the natural meander of Muddy Creek, we have crossed it for many decades, as it provides the only through-going route besides the graded Reef road and the paved highway.

5. North of Blackburn Draw / Little Meadow, a full-size vehicle route connects WYBD0199 to WYBD0177), creating loop opportunities northeast of Hanksville with more flowing trail and scenic views than most routes in the sand flats further northeast. From this route, an old constructed road climbs north to reach WYBD0198, thus staying further away from Little Meadow. Since the old road wasn't designated open in 2008, it is now less apparent, but still offers a viable connection from WYBD0199 to WYBD0198.

6. Several routes to the planning area boundary are missing despite that they are designated open on the other side, such as one that follows the west side of North Spring Wash (northwest of Little Saucer Basin) and becomes SD333 as designated by the San Rafael Desert TMP decision of 2022.

Perhaps some of the missing routes were excluded from the inventory because they appeared to be partially "reclaimed" or hard to find. This appearance doesn't justify exclusion because it doesn't mean that:

1. The routes have received no OHV use in recent years (as some terrain is prone to disguising evidence of use),
2. The routes have no current value for OHV use (as a lack of use could be due to a lack of wayfinding signs),
3. The routes have no potential value for OHV use (as the amount and types of recreational use increases), or
4. Use of the routes would cause significant adverse impacts (as some routes are essentially innocuous, especially when they receive a modicum of management like basic maintenance and user education, which can be supported through resources such as OHV groups and the State of Utah as well as Garfield and Wayne counties).

In fact, often the more primitive routes are quite manageable because basic measures can be taken before any major increase of use, and often they are of higher quality for OHV riding. Most OHV riders favor trail characteristics that offer more challenge, a sense of flow, and connection with the surroundings.

Also perhaps some of the missing routes were excluded from the inventory to avoid the expense of doing more Class III cultural surveys. While the 2017 settlement may require cultural surveys to be done on HMFG routes that will be designated open, it does not require cultural surveys to be done on HMFG routes that will be merely proposed to be designated open by an alternative, and it does not require cultural surveys to be done on HMFG routes that will be included in the route inventory. When it comes to actually designating the routes open, the additional time needed to perform cultural surveys would surely be granted given that its purpose is to comply with the 2017 settlement.

4. At least one alternative must propose to open many of the currently-inventoried routes in order to provide an adequate range of alternatives.

Good planning depends on considering a healthy range of alternatives and, if it wouldn't be unreasonable to designate a given route open, then it should be open in at least one of the alternatives. Many such routes (that were included in the route inventory and are reasonable to open) are not open in any of the preliminary alternatives.

Viable routes being excluded from every alternative can be found across the planning area, all of which should be revisited in at least one draft alternative, but the organizations will provide three examples:

1. Between North Hatch Wash and Big Ridge, the bench road (GABD0511) is "reclaiming" according to your preliminary route report, but it clearly exists and is still passable as you can see from the following photo of its entrance in 2021.



Also the bench road is "in Mexican spotted owl critical designated habitat" according to your preliminary route report, but it's hundreds of feet below the cliffs, so it seems possible that it will not cause considerable adverse effects. Likewise the route has "potential for conflicts between off-road vehicle users and dispersed, non-motorized/non-mechanized forms of recreation" according to your preliminary route report but, in the vicinity of the bench road, non-motorized use doesn't seem common or particularly sensitive to responsible use of the road. Plus those seeking more exclusively non-motorized recreation can find it in the wilderness study areas (WSAs) that are north and south of the bench road as well as the national recreation area and national park that are east of the bench road, as Big Ridge is an island of traditional multiple-use management. The organizations are open to additional information but, at this stage, it seems entirely appropriate to open the bench road in at least one alternative.

2. The primitive road up Cass Creek (GAHM0308b) climbs from 8,600' to 9,800', and the additional elevation provides more forest cover as well as the sense of being "in the mountains" instead of merely

"on the mountain," not to mention the welcome challenge of scaling a rocky route. We have ridden this route prior to 2008, and it's quite important along with the few other primitive routes in the Henry Mountains, as motorized travel is confined to graded roads in most of the Henry's. The preliminary route report states the potential for negative impacts to soil and wildlife, but seasonal restrictions could be applied so long as it's open for most of the summer and fall. The preliminary route report states the potential for negative impacts to the surrounding WSA, but much of the sights and sounds of motorized use are screened by the route's location, as it sits in the bottom of a major drainage surrounded by vegetation.

3. The Coal Mine Wash route (WYNC0047c) is an important link as well as providing striking views in a relatively remote part of Lower Blue Hills and a challenging climb up to Upper Blue Hills. The preliminary route report states the potential for negative impacts to endangered plants species, but basic measures like route marking could ensure that the vast majority of use would be confined to the designated route. It also states the potential for negative impacts to cultural sites, but there's plenty of room in the given terrain for rerouting as needed. Going back decades, we have enjoyed riding this route, as well as every other route mentioned in these comments. Opening the route shouldn't be ruled out at the outset of the draft TMP, so it should be open in at least one alternative, then it can be vetted further.

5. When developing TMP alternatives, the 2017 settlement does NOT require an alternative to close routes in lands with wilderness characteristics, only in natural areas and WSAs.

Many of your preliminary route reports state "Per the Settlement, BLM is analyzing at least one alternative route network that designates routes in BLM-inventoried wilderness characteristics as closed to public OHV use." Also your preliminary Alternative B closes virtually every route within lands with wilderness characteristics (LWCs) other than those that form cherry-stems or other boundaries of LWCs.

However the 2017 does NOT require an alternative to close routes in LWCs, only in the subset of LWCs that are "natural areas" (which is an RMP decision) as well as WSAs, as indicated by the very heading of that part of the 2017 settlement:

"f. Alternative route networks within WSAs and Natural Areas.

For routes or portions thereof that are located on public land within wilderness study areas ("WSAs") and Natural Areas, BLM will analyze in the NEPA document at least one alternative route network that would enhance BLM-inventoried wilderness characteristics by designating the routes or the relevant portions thereof as closed to ORV use, unless ORV use of the route is authorized by an existing right-of-way or other BLM authorization or by law. To the extent ORV use of a route is authorized, this alternative route network will include measures limiting ORV use to enhance BLM-inventoried wilderness characteristics to the greatest extent possible consistent with applicable laws, regulations, or existing right-of-way authorizations."

Therefore your draft alternatives should not propose to close any routes outside of natural areas or WSAs for the purpose of minimizing impacts to wilderness characteristics (WC).

6. When making the TMP final decision, impacts to wilderness characteristics should not be minimized outside of areas that the RMP directs to manage for wilderness characteristics.

Through approving the 2008 Richfield RMP, the BLM decided to manage for WC in 12 areas that it calls natural areas to distinguish them from other LWCs, which the BLM decided not to manage for WC. The 12 natural areas total 78,600 acres on top of the WSA acreage. Outside of natural areas and WSAs, the BLM should not restrict recreation for the purpose of minimizing impacts to WC, nor should it manufacture other purposes. Rather the BLM should comply with the RMP decision to not manage for WC in the remaining LWC acreage.

7. Conclusion

The organizations hope these comments help you to honor the 2008 RMP decisions, comply with the 2017 settlement, and thoroughly inventory the HMFG routes along with their recreational value to accommodate the growing enthusiasm for motorized trails in this inspiring landscape.

Sincerely,



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