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June 28th, 2024

Bureau of Land Management  
Moab Field Office  
82 East Dogwood  
Moab, Utah 84532

RE: Dolores River Travel Management Plan (DOI-BLM-UT-Y010-2024-0029-EA)

Dear Dolores TMP Project Manager:

Please accept this correspondence from the above organizations as our official comments regarding the Dolores River (DR) Travel Management Plan (TMP) that was opened for scoping by the Bureau of Land Management (BLM).

### 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, including some within the DR planning area, 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**

The DR planning area is very important for motorized trail riding and driving. Although it has less use than the Labyrinth Rims area, DR includes popular routes such as Top of The World and Kokopelli's Trail, and the planning area provides a more backcountry experience on primitive routes with great views from both sides of the Dolores River. It will be important to plan thoroughly, including a complete inventory of routes and analysis of their relevant and associated socio-economic value, in order to sustain diverse recreational opportunities.

### **3. Consider the context of public lands surrounding the planning area.**

The forthcoming Environmental Assessment (EA) should consider at the landscape level the many opportunities for solitude and non-motorized recreation that already exist throughout the Moab Field Office planning area, before considering whether any such additional areas should be designated within the DR planning area at the expense of existing motorized roads and trails already there. Immediately north of the planning area is the Black Canyon Wilderness and Westwater Canyon WSA as well as being the Westwater Canyon River Use and Hiking Area. Immediately west of the planning area is another non-motorized focus area, the Richardson Amphitheater/Castle Rock Hiking and Climbing Area.

### **4. The DR TMP planning process should begin with a complete inventory of all existing routes.**

The 2017 court settlement agreement that directs the BLM to review its DR TMP also states:

Public scoping. At the initiation of the travel planning scoping period for a new TMP, BLM will make available to the public and stakeholders maps of all BLM-inventoried routes being considered for designation under 43 C.F.R. § 8342.1. Such route inventory maps will include spur routes leading to Utah State Institutional Trust lands, facilities, campsites, and other points of interest, which may include overlooks and natural and historic features.

43 C.F.R. § 8342.1 addresses the designation process and places no limits on the inventory process, so the 2017 settlement clearly directs the BLM's scoping to provide maps of all BLM-inventoried routes. Obviously BLM-inventoried routes includes all routes in the No Action alternative of the 2008 FEIS for the Moab Field Office RMP and TMP. However it should also include routes that were missed at that time, as

the BLM didn't do its own thorough route inventory, and instead relied on Grand County's inventory that was funded by the State of Utah. Generally Grand County did a good job, but the county chose to exclude many routes, including motorized singletrack or ATV trails and wash bottoms with no evidence of mechanized construction. Further, particularly on the east side of the Dolores River that's inaccessible from Moab for most of the year, Grand County simply missed routes despite that they're full-size vehicle routes outside of wash bottoms. Some of the missed routes may not be used or not have an obvious purpose and need, such as some of the many seismic lines on Dolores Point. However other missed routes absolutely are used, provide great value, are viable to be managed sustainably, and in any case deserve to be acknowledged and analyzed by the forthcoming EA. Sound decisions depend on a thorough appraisal of the current conditions, which is a tenant of NEPA, and a complete route inventory is required by the 2017 settlement.

## **5. Examples of missing routes**

Although it is not the Organizations' responsibility to provide a complete route inventory, we'll provide a couple examples of routes missing from your scoping inventory map that were in the No Action alternative of the 2008 FEIS, and a couple examples of routes missing from your scoping inventory map that were also missing from the No Action alternative of the 2008 FEIS. The following examples are listed from south to north, with UTM coordinates in NAD 83 of their starting and ending points, and their locations between the ends clearly visible on satellite images:

A. Southwest of Lumsden Canyon  
starting point 668239.437, 4278359.787  
ending point 668870.302, 4278376.770

This primitive road is missing from the scoping inventory map, but was in the No Action alternative of the 2008 FEIS. The entire route receives periodic use, is designated open for motorized use by the BLM on the Colorado side of the state line, and provides significant connectivity.

B. West Dolores Point loop  
starting point 668725.521, 4281588.955  
ending point 668788.136, 4282182.548

This primitive road is missing from the scoping inventory map, but was in the No Action alternative of the 2008 FEIS. The entire route receives periodic use, is designated open for motorized use by the BLM on the Colorado side of the state line, and provides connectivity for a large loop that's of tremendous value as it flanks Dolores Point.

C. Southwest Scharf Mesa  
starting point 657849.192, 4296575.11  
ending point 656125.386, 4297459.180

This primitive road is missing from the scoping inventory map, and was missing from the No Action alternative of the 2008 FEIS, but has existed for many decades. The entire route receives periodic use and has significant recreational value as it flanks Scharf Mesa, providing unique glimpses of the Dolores River canyon.

D. Scharf Mesa - Buckhorn Mesa link  
starting point 656854.700, 4300208.870  
ending point 658327.180, 4303146.738

This primitive road is missing from the scoping inventory map, and was missing from the No Action alternative of the 2008 FEIS, but has existed for many decades. In fact, the route is shown as a “4WD trail” on USGS topographic maps. The entire route receives periodic use and has significant recreational value as it links Scharf Mesa and Buckhorn Mesa, providing north-south connectivity that’s rare on the north side of the Dolores River other than the graded roads.

Again, there are many other important routes missing from the scoping inventory map, but these four examples illustrate the fact that a lot more bona fide routes are missing than seismic exploration lines which were presumably deemed redundant.

**6. Starting with a complete route inventory is also needed to meet the intent of revisiting the 2008 TMP decision.**

The 2017 court settlement agreement states that the existing TMPs will remain in effect until the BLM issues new TMPs for the twelve Travel Management Areas (TMAs). However it does not state that the existing TMPs will become the baseline for analysis of the new TMPs. Since the 2017 settlement essentially directs the BLM to revisit twelve parts of the 2008 TMPs (i.e. the twelve TMAs), the appropriate baseline would be the one that was used to develop the 2008 TMPs in the first place, which is the No Action alternative of the 2008 FEIS. In other words, to revisit the twelve parts of the 2008 TMPs, we must consider the motorized-travel policies that existed prior to the 2008 RODs.

To truly revisit the Dolores River part of the 2008 TMP decision, the forthcoming EA should provide for one alternative that includes all the existing routes. That would amply show how much minimization the BLM has already done through the routes closed as part of the 2008 TMP decision.

Further, to truly revisit the Dolores River part of the 2008 TMP decision, the forthcoming EA should unambiguously acknowledge that most of the planning area was open to cross-country travel by motor vehicle until 2008. Even if all the existing routes were designated open, it would still occupy less than 1% of the acreage, thus any TMP will greatly reduce motorized access and any adverse impacts from the status quo prior to the 2008 decision.

**7. The route inventory shouldn’t exclude routes merely because they appear to be partially “reclaimed” or difficult to follow.**

The lack of on-the-ground appearance of some routes doesn't justify excluding them from a route inventory because it doesn't mean that:

1. The routes have received no OHV use in recent years (as some terrain is prone to quickly 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).

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 remote settings and trail characteristics that offer more challenge, a sense of flow, and connection with the surroundings.

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

Thorough and adequate planning depends on considering a diverse 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.

**9. The EA's decision matrix should put the onus on requiring justification before closing any existing route, rather than requiring justification to keep an existing route open.**

Leaving a route open would not only follow the status quo of management prior to the 2008 TMP decision, it would carry out the BLM's mission of multiple use provided that the route can be used sustainably. Any resource-conflict concerns should consider the full array of options to mitigate those conflicts. Route closure is often not needed or even the most effective solution. Alternatives include educating visitors how and why to practice minimum-impact guidelines, trail work (e.g. marking the trail / blocking off the sides / stabilizing the tread in order to prevent erosion and discourage bypassing), and rerouting the trail to avoid sensitive sites altogether. The EA should identify these solutions and set a course to pursue them rather than unnecessarily closing a route even temporarily. Route closures tend to have their own costs in terms of public relations, noncompliance, and the displacement of negative impacts. They should be done only as a last resort after fully pursuing less-restrictive measures.

**10. 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.**

The 2017 court settlement agreement 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 forthcoming 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).

**11. 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 Moab RMP, the BLM decided to manage for WC in the Beaver Creek natural area and decided not to manage for WC anywhere else in the DR planning area. Outside of the Beaver Creek natural area, 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.

**12. Within the Beaver Creek natural area, the EA should recognize that impacts to WC have already been minimized.**

Within natural areas such as Beaver Creek, the BLM is not required to further reduce any adverse impacts to WC, and it has already minimized such impacts through the 2008 TMP that closed many valuable routes, some of which weren't even inventoried. For example, motorcyclists used to ride down Beaver Creek itself, and the 2008 TMP eliminated this exceptional recreation opportunity among others. Any routes within natural areas left open by the 2008 TMP were determined not to impair WC as they were deemed "ways" that are maintained without mechanized equipment. Such routes tend to be particularly valuable for motorized trail enthusiasts due to their more primitive character, and they are worthy of conservation in their own right.

**13. The EA should be scoped to consider the important socio-economic resource value of motorized recreation.**

Motorized recreation is without question a major component of tourism industries from Moab to Grand Junction, and OHV riders tend to spend more per day than other recreationists. The forthcoming EA must

utilize best available data, such as that from the Bureau of Economic Analysis regarding outdoor recreation and that funded by Colorado Parks Wildlife regarding OHV recreation.

The EA should not repeat the Labyrinth Rims TMP's false assumption that only 6% of visitation in the planning area is motorized trail use, for which the Labyrinth Rims TMP cited two erroneous sources. The first source is a 2007 survey that was intended to test the accuracy of a methodology that's new to BLM lands. The methodology depends on finding recreationists during their visit to BLM lands and persuading them to take a long survey. Motorized trail use tends to be more dispersed, making those participants less likely to be reached, let alone to convince them to fill out a survey instead of continuing on their ride or drive. The second source is the Manti-La Sal National Forest draft plan, which doesn't actually state that motorized trail use is 6% of visitation, but rather states that "Motorized trail activity in general is reported as a main activity for approximately 20 percent of all visitors to the Forest in 2016 (U.S. Department of Agriculture, Forest Service, 2017) and 32 percent in 2021 (U.S. Department of Agriculture, Forest Service, 2023)."

**14. The EA should be scoped to consider the full consequences of route closure, including a loss of carrying capacity.**

The Labyrinth Rims TMP claimed that closing 317 miles of motorized routes wouldn't harm casual or commercial use because of miles of routes are still open in that planning area, and thousands of miles are open in the Moab Field Office. However many of the remaining routes are graded roads or lack the quality, connectivity, or variety sought by almost any trail enthusiast. To the extent that good substitute routes still exist, the closure of many miles still greatly reduces the given trail system's carrying capacity. Even if high use levels would never occur on every single route, lesser-used routes are quite valuable to a segment of motorized recreationists. The fact that some routes are spared from closure is of little consolation for the mileage lost. Closing many miles of route would be a substantial loss for the quality of life and livelihood of many motorized trail enthusiasts.

**15. The EA should be scoped to consider the full consequences of route closure, including non-motorized use of motorized routes.**

Motorized routes provide access for everything from picnicking to camping, hiking to biking, and photography to base jumping just to name a few. For another thing, most of the routes are not causing the degree of conflict that's claimed by groups seeking to vastly expand wilderness designation across public lands. Spur roads to overlooks rarely bother anyone who might be hundreds of feet below them, and each overlook is separated by miles of rim that has no motorized route. Non-motorized recreationists benefit from trails, both motorized and non-motorized. More non-motorized trails can be established, in certain instances by converting an old road (which should seek state approval), but in most cases by designating a new trail. Likewise, wildlife often benefits from trails, as they streamline human activity, and the vast majority of detrimental routes were already closed by the 2008 TMP.

**16. The EA should be scoped to consider the full consequences of route closure, including a likely decrease compliance and increase the burden of maintenance.**

The Organizations don't condone noncompliance, but closing many more miles of route would likely make it more prevalent. As the TMP becomes austere, frustrated recreationists would be more tempted to use the closed routes, make new routes, or simply travel cross-country. This disruption of managed use patterns would make it harder for non-motorized recreationists and wildlife to predict where motorized use will occur, thus negatively impacting these resources. Closing many more miles of route would also likely increase braiding of the remaining routes due to increased use levels leading to increased traffic density, passing between vehicles, and potential soil erosion leading to increased ledging and rutting of the trail tread. Confining a given amount of use to a much smaller network of routes is more expensive because whatever savings might result from fewer signs are quickly lost from increased tread work that's more expensive than signs, not to mention the cost of getting people to stop using the closed routes.

**17. The EA should be scoped to consider the full consequences of route closure, including a likely increase crowding and conflicts.**

Closing many more miles of route would obviously increase use of the remaining routes, turning low-use routes into moderate-use routes, moderate-use routes into high-use routes, and high-use routes into exceptionally high-use routes. Perceptions of crowding would increase on routes of all these use levels, which increases the potential for conflict. Motorized recreationists may feel entitled to use the remaining routes more exclusively, and may feel animosity toward the non-motorized recreationists for the closures, which erodes goodwill. As with many other negative consequences, the conflict becomes a self-fulfilling prophecy when closures are excessive, as the closures are often driven by ideology more than a focus on actually resolving issues.

**18. The EA should be scoped to consider the full consequences of route closure, including a likely reduction in the stewardship capacity of motorized recreationists.**

Closing many more routes would lower the morale of OHV groups partnering with the BLM, and it would hamper volunteer recruitment and retention. While most of us still want to contribute toward trail work and education projects, we now have less capacity to do so, as more of our bandwidth is absorbed by advocating against excessive closures. When it comes to some of these closures, we feel compelled to protect our investments by challenging closures, which costs a lot of time and money. Resources that OHV groups, businesses, and individual enthusiasts put toward advocacy of access can't go to stewardship projects. Likewise the land management agency budgets have increasingly gone to legal defense instead of actually working on the land. Similarly the state could spend even more to assist the federal agencies if it weren't so compelled to challenge them. None of these trends bode well for the actual conservation of resources in the long run.

**19. The EA should be scoped to consider emerging technologies such as electric vehicles and electric bicycles.**



Within the next decade, the majority of vehicle and bicycle sales may become electric as opposed to an internal-combustion engine vehicle or traditional bicycle, which would greatly reduce the sound produced by the use of motorized trails. Electric vehicles are already available commercially in the bicycle, motorcycle, ATV, UTV, and full-size markets, and electric is already the fastest-growing segment.

## 20. Conclusion

Rather than regarding the DR TMP as another generation of travel planning (yet with self-imposed limitations such as excluding all route additions from any consideration), the DR TMP should be regarded as a re-evaluation of the decisions made in 2008, thus accounting for and analyzing changes to the previous conditions and rules that were in place. Starting with a complete route inventory, the forthcoming EA should recognize the importance of motorized trail-based recreation and of each route in the planning area, clearly stating any resource concerns and favoring mitigation measures before closure would be deemed necessary. This process is justified given the importance of routes on both sides of the Dolores River.

Sincerely,



Clif Koontz  
Executive Director  
Ride with Respect



Chad Hixon  
Executive Director  
Trails Preservation Alliance



Marcus Trusty  
President/Founder  
Colorado Off Road Enterprise



Scott Jones, Esq.  
Authorized Representative  
Colorado Off-Highway Vehicle Coalition