



Bureau of Land Management
Price Field Office
125 South 600 West
Price, Utah 84501

January 7th, 2022

Dear BLM Planning Team:

We appreciate the opportunity to comment on your scoping of Price RMP amendments to implement the Dingell Act. It represents a chance to meet the challenges that land managers face with growing recreation.

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. RwR has performed over 20,000 hours of high-quality trail work on public lands, most of which was in the Moab Field Office. In the Price Field Office, RwR has participated in the 2008 RMP and subsequent travel planning.

The Sage Riders Motorcycle Club has approximately 100 dues-paying members. Specific to the Price Field Office, the club has spent hundreds of hours advocating for responsible off-highway vehicle (OHV) access leading up to the 2003 travel plan for the San Rafael Swell. Since then they have volunteered thousands of hours of community service implementing this travel plan, which included blocking off some routes, marking other routes "open," developing a travel map of the area, and improving this trail system for all to enjoy.

The Castle Country OHV Association (CCOHVA) was established in 2000, uniting Carbon and Emery counties into one OHV group. CCOHVA averages 120 paid family memberships from Carbon and Emery counties, but also extend to surrounding states and as far away as California. Their membership funds are used to promote rides on local and statewide OHV trails and contribute to other organizations that support our access to OHV trails. CCOHVA works alongside the BLM and U.S. Forest Service for trail clean-up projects and trail maintenance.

Our organizations would like to ensure that the wilderness areas, San Rafael Swell Recreation Area, Wild And Scenic River (WSR) areas, and surrounding parts of the Price Field Office continue to be utilized for the allowable types of recreational use. Please remember that Emery County agreed to the massive wilderness designation so the remaining areas would continue to be managed more inclusively by the multiple-use form of conservation. Indeed, settling the wilderness debate was the spirit shared by all congressional sponsors of the Emery County bill.

Also for historical context, the roughly 450,000 acres of Wilderness Study Areas (WSAs) in the Price Field Office had hundreds of miles of existing OHV routes that were mapped and submitted by OHV advocates. The Emery

County bill of 2018 proposed to designate nearly 550,000 acres of wilderness, but at least the additional acreage avoided county roads and other well-established routes. Unfortunately the packaged Emery County bill of 2019 proposed to designate over 650,000 acres of wilderness, with those additional acres encompassing 73 miles of Class D roads and at least that many other motorized routes that had not been marked "closed" on the ground, nor had they even been analyzed for closure (through a complete travel-planning process that would start with a complete inventory of existing routes). The point is that designating approximately 660,000 acres of wilderness permanently closed many well-established routes to motorized and mechanized travel.

Further, as your scoping document points out, the Dingell Act prohibits the construction of new motorized routes within the Recreation Area. This prohibition limits the BLM's ability to accommodate the growth of motorized recreation within the recreation area which, in combination with the extensiveness of wilderness designations, will displace the increasing recreational activity to surrounding areas. If not mitigated, this displacement puts the entire Price Field Office at risk of failing to get a handle on recreation, which is the fastest growing use of public lands. Fortunately, trails can be designed and constructed for all types of use in a rather sustainable fashion, provided sufficient direction by the Price RMP.

Non-mechanized uses such as hiking, horseback riding, and rock climbing should be accommodated in the wilderness areas. The Price RMP should direct the development of non-mechanized trails in wilderness areas, and allow administrative use of mechanized tools to build and maintain this primitive infrastructure most efficiently. It should permit commercial activity that would help the public realize recreational or other wilderness purposes of the area, which may provide an important niche of the tourism economy of surrounding towns.

Mechanized uses such as mountain biking (preferably including low-power, pedal-assist e-bikes) should be accommodated in the Recreation Area. The Price RMP should direct the development of trails in the recreation area for mountain bikes and certain e-bikes, and these trails should tend to be located away from the existing motorized routes in order to provide solitude for bicyclists, and to prevent potential conflicts. The Price RMP should clarify that the construction of motorized routes is permitted for the purpose of relocating an existing route. Specifically the Dingell Act states "Effect.--Nothing in this subsection prevents the Secretary from rerouting an existing road or trail to protect Recreation Area resources from degradation or to protect public safety, as determined to be appropriate by the Secretary." The Price RMP should also clarify that motorized routes may be added to the travel plan so long as they don't require construction. The Recreation Area includes many existing routes that have been continuously used by the public without issue, and can be analyzed by the San Rafael Swell TMP process, provided that the Price RMP doesn't conflate constructing new routes with adding existing routes to the TMP. Above all, the Price RMP should recognize that recreation is the foremost purpose of the Recreation Area. Yes, the Dingell Act establishes additional purposes of the Recreation Area, most of which are partially redundant. Nevertheless it is a Recreation Area by name, and the BLM should resist pressure by wilderness-expansion groups to make it a Recreation Area by name only. In fact, the Emery County bill of 2018 had changed the name from Conservation Area to Recreation Area specifically as a concession to OHV stakeholders, and the BLM is now entrusted to uphold this congressional intent.

In contrast, the WSR classifications of Wild / Scenic / Recreational do not indicate the foremost purpose, rather the level of development. Recreational River areas are readily accessible by road or railroad, may have some

development along their shorelines (even houses where private property exists), and may have undergone some impoundment or diversion in the past. The Price and Moab RMPs should indicate that more highly-developed recreation infrastructure is entirely consistent with the Recreational section of the Green River (from Nefertiti to Swaseys Rapids). Scenic River areas are free of impoundments, with shorelines or watersheds still largely primitive and shorelines largely undeveloped, but accessible in places by roads. The Price and Moab RMPs should indicate that motorized routes are entirely consistent with the Scenic section of the Green River (from Ruby Ranch to Canyonlands National Park). The Price and Moab RMPs should ensure that motorized routes within Labyrinth Canyon can be managed with a full range of tools, including heavy equipment and rerouting as needed. Congress obviously did not intend for Labyrinth Canyon to be roadless, otherwise it would have designated it a Wild River.

Just as the WSR designation of Labyrinth Canyon provides no rationale to further restrict motorized use there, neither does the designation of the wilderness area on the west side of Labyrinth Canyon. In fact, the Dingell Act specifically forbids such a rationale in its section on Adjacent Management:

"(1) In general.--Congress does not intend for the designation of the wilderness areas to create protective perimeters or buffer zones around the wilderness areas.

(2) Nonwilderness activities.--The fact that nonwilderness activities or uses can be seen or heard from areas within a wilderness area shall not preclude the conduct of those activities or uses outside the boundary of the wilderness area."

This anti-buffer language is found in most legislation that has designated wilderness areas, but it is particularly relevant for the 17 wilderness areas established in Emery County, as most of their boundaries are formed by the corridors of motorized routes including the Green River. The Price and Moab RMPs should include this anti-buffer language to ensure that the designation of these wilderness areas does not wind up restricting adjacent uses.

In the locations where the Dingell Act designates 14 wilderness areas and the Recreation Area, the San Rafael Swell Special Recreation Management Area (SRMA) can be removed in order to simplify management. However the surrounding area should continue to be managed by the SRMA. In fact the SRMA should be expanded (1) northeast to encompass the other half of the Chimney Rock trail system, (2) northwest to develop OHV trails that are convenient for the residents and visitors of the towns along UT-10, (3) southwest to encompass the rest of the Mussentuchit area, and (4) east to include Buckmaster Draw and Lost Spring Wash. All four of these areas will experience more OHV use as it's displaced by the designation of 660,000 acres of wilderness, especially given that additional OHV trails won't be constructed in the Recreation Area. They won't increase the overall size of the SRMA since the Recreation Area and wilderness areas will be removed. To reflect this shift in location, it could be renamed the Greater San Rafael Swell SRMA, or divided into four SRMAs. Either way, it will enable the building of sustainable trails to enhance the existing route network, thus preparing these outlying areas to handle increased use.

The expansion of an OHV-friendly SRMA would help the BLM to essentially rebalance its opportunities across the Price Field Office. This rebalancing, in combination with management guidelines to fully utilize the Recreation Area and wilderness areas, would carry out the Dingell Act's intent while preventing unintended consequences. We look forward to working through the details with you as the planning progresses.

Sincerely,



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Castle County OHV Association



Wade Allinson
Southeastern Utah Public Lands Repr.
Sage Riders Motorcycle Club



Clif Koontz
Executive Director
Ride with Respect