

June 14, 2022

To: Grand County Commission

Re: Grand County Trail Mix Comments on Sustainable Camping in High-Use Areas NEPA

Grand County Trail Mix is the official advisory committee for non-motorized trails in Grand County, Utah. We work closely on a consistent basis with the Moab Field Office of the Bureau of Land Management (BLM) on many projects and issues involving non-motorized recreation planning and management on BLM-managed public lands.

Trail Mix is strongly in support of proposed actions by the BLM to make camping and related recreation on public lands more sustainable in increasingly high-use areas (actions proposed in DOI-BLM-UT-Y010-2021-0094-EA, 0095-EA, and 0096-EA, collectively “Camping Management Plans”). We agree with BLM’s conclusion that limiting camping to designated dispersed campsites that have been chosen to have minimal impact to cultural and natural resources and requiring the use of a toilet system, fire pan, and restricting wood gathering and harvesting would help manage many of these previously-unforeseen and currently-unmanaged impacts of public lands recreation in a way that will best preserve the resource and visitor experience and access far into the future.

As you know, visitation to the Moab area and to Moab-area public lands by both motorized and non-motorized recreationists has increased exponentially over the last decade. As noted in the draft Environmental Assessments (EA) for the proposed actions, pressures on the landscape from visitation and associated dispersed camping has had a particular uptick in the last five years, only exacerbated by the COVID-19 pandemic.

Members of our committee not only regularly recreate on public lands but also help maintain them and provide education to non-motorized recreationists, and are often the main point of contact between public user groups and land managers for both positive and negative feedback about their experiences on local public lands. With this uptick in visitation and drastic increase in dispersed camping and recreation in our area, there has been a noticeable and even disruptive increase in visitor impacts, including improper disposal of human and pet waste, trash, rock fire rings and ash piles, illegal associated motorized travel far off of designated routes, and disturbance of wildlife and intentional or accidental damage to cultural and historic sites.

Grand County Trail Mix supports each of these proposed management actions, as we believe they have the highest likelihood of preserving and protecting quality recreational experiences for all user groups on Moab’s public lands. According to BLM:

Campsites would be designated largely in previously disturbed locations and their intended use made clear and transparent through signing and delineation as

needed. Each campsite would be subject to archaeological, paleontological and wildlife clearances prior to designation. Routes would be marked for vehicular access to the campsites. Existing dispersed campsites that are not designated would be reseeded and restored to enhance recovery from the past impacts of dispersed camping.

Labyrinth Rims/ Gemini Bridges Camping Management Draft EA at 4. Additionally, BLM's plans note that designated campsites would not be located within 0.5 miles of rock formations, cliffs or outcrops that provide nesting habitat for raptors, or within sensitive locations such as canyon bottoms in bighorn sheep habitat or within 300 meters of canyon rims. We appreciate that BLM is still proposing to allow free dispersed camping in ample spectacular locations throughout Grand County while also following good principles of site selection and recreation ecology to protect these resources. This is particularly relevant to us as a body whose members regularly build and maintain recreation locations across public lands and understand the importance of site-hardening and concentrating vs. dispersing user impacts on the Colorado Plateau.

These limitations will ensure that important resources that public lands users enjoy such as wildlife, scenic values, and archaeological sites remain in-tact and protected, while allowing ample opportunities for all members of the public to camp in areas most suited to and resilient to this kind of recreational use. We support the proposed Camping Management Plans as drafted and would encourage the Grand County Commission in its official capacity to articulate the same to BLM during the public comment period. We would also like to suggest that the BLM look into extending the boundaries of the proposed management areas to account for a larger and more logically-defined area where visitors are likely to seek out dispersed camping. We would like to echo the recommendations made on this specific item by the Grand County Motorized Trails Committee, which are: (1) extend the boundary of the Labyrinth Rims/ Gemini Bridges planning area north to I-70, with the eastern boundary at the Blue Hills; (2) extend the boundary of the Utah Rims planning area southwest to the Cisco Boat-Launch Road.

Thank you all, and please reach out to us if you have any questions.

Sincerely,
Grand County Trail Mix