

June 14th, 2022

To: Grand County Commission

Re: Motorized Trails Committee Comments on Sustainable Camping in High-Use Areas NEPA

As the official advisory committee for motorized trails in Grand County, we encourage the Grand County Commission in its official capacity to support the three draft Camping Management Plans with additional requests as described in the draft letter below. Please note that the BLM will accept public comments through ePlanning until June 23rd:

<https://www.blm.gov/press-release/blm-moab-field-office-accepting-comments-proposals-make-camping-more-sustainable-high>

Camping use relates to trails in several ways. When in close proximity, campsites and trails can negatively impact one another, requiring careful management. By the same token, camp and trail opportunities can enhance one another, as many recreationists enjoy both activities. Since the three draft Camping Management Plans focus on the most popular areas of dispersed camping, the planning areas also cover many of the best recreational trails in Grand County, and the success of these plans is important to us.

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

Sincerely,



Clif Koontz
Motorized Trails Committee Chair

June 21st, 2022

Nicollee Gaddis-Wyatt
Bureau of Land Management
82 East Dogwood Avenue
Moab, Utah 84532

Dear Ms. Gaddis-Wyatt,

As you know, Grand County works closely on a consistent basis with the Moab Field Office of the Bureau of Land Management (BLM) on many projects and issues involving recreation planning and management on BLM-managed public lands.

Grand County 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 the 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 prohibiting wood cutting and gathering 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 (EAs) 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.

Many of Grand County's staff, advisory committees, and community members not only regularly recreate on public lands but also help maintain them and provide education to 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 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 the BLM at Page 4 of the Labyrinth Rims/Gemini Bridges Camping Management Draft EA:

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.

Additionally, the 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 or within 300 meters of canyon rims in bighorn sheep habitat as identified in the 2016 Moab Master Leasing Plan. We appreciate that the 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 county that regularly builds and maintains recreation infrastructure across public lands and understand the importance of site-hardening and concentrating versus dispersing user impacts on the Colorado Plateau.

Likewise we appreciate that the BLM has voluntarily initiated planning for dispersed camping despite that such sites are less likely to generate revenue for the agency. To ensure that dispersed camping will remain available in ample spectacular locations throughout Grand County, we request the following additions to your Draft EAs:

1. Identify the range of camping styles to provide for, such as camping focused on (a) "convenience" which might be best-suited for sites that can accommodate multiple groups in one large area and tend to be near highways, (b) "activity" which might be best-suited for sites that provide space for larger groups or larger vehicles that tend to be a little further from highways, and (c) "setting" which might be best-suited for sites that are smaller and tend to be even further from highways. Such styles may not be so discrete, but this exercise could help to ultimately provide camping opportunities that are diverse in terms of the sites as well as their settings.
2. Inventory the location of existing campsites, and solicit the public to comment on your proposal of which sites to designate open or closed. The designation of dispersed campsites may have gone smoothly in past without an opportunity for public comment but, given the size and significance of these planning areas, this extra step is worthwhile. If this step is not feasible in the current EAs, they could simply outline how it will be done by subsequent planning. This step should help to identify all sites that are suitable for designation so they aren't inadvertently overlooked. It should help minimize the displacement that is likely to occur as non-suitable sites are closed, and campers search for sites outside of the three planning areas.
3. To minimize displacement, expand the boundaries of the planning areas to encompass all of the contiguous terrain that is comparably desirable for camping. Otherwise restricting the planning areas to designated campsites will shift use to these nearby comparable alternatives,

likely increasing the negative impacts in total. The current boundary of the Labyrinth Rims/Gemini Bridges planning area is Tenmile Point Road, but desirable terrain and in fact many campsites extend north from there all the way to the outskirts of Green River, so we suggest extending the boundary to there. The eastern boundary can follow the Blue Hills, as any displacement northeast of the Blue Hills is likely to be less common and less concerning since that area has fewer sensitive resources. The current boundary of the Utah Rims planning area is the Westwater Put-In Road, but desirable terrain and in fact some campsites extend southwest from there all the way to the Cisco Boat-Launch Road, so we suggest extending the boundary to there. As with the expanded Labyrinth Rims/Gemini Bridges planning area, the terrain beyond this expanded Utah Rims planning area is dominated by Mancos Shale slopes, which tend to have less camping appeal and fewer sensitive resources. The expanded planning areas would also benefit from the proposals to require the use of a toilet system, fire pan, and prohibiting wood cutting and gathering.

4. Coordinate the designation of dispersed sites with developed campgrounds, both current and future. Propose an approximate buffer distance around developed campgrounds where no dispersed sites will be designated. Identify any locations within the three planning areas where future campground development may be warranted so that you may propose to designate dispersed sites in the interim that would conform with such development. Soliciting public comment about the interface of dispersed sites with campgrounds should help guide the BLM in future developments if camping interest continues to increase. In turn, once the dispersed campsites are designated, the BLM and Grand County can help guide campers to campgrounds or dispersed sites from when they plan their trip to when they reach a sign notifying them that "no campsites are designated beyond this point."

These requested additions in combination with the aforementioned limitations established by your Draft EAs will ensure that important resources that public lands users enjoy such as wildlife, scenic values, and archaeological sites remain intact 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.

Sincerely,

Jacques Hadler
Chair, Grand County Commission