



**GRAND COUNTY COMMISSION**  
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May 18, 2021

Nicollee Gaddis-Wyatt  
82 East Dogwood  
Moab, UT 84532

Dear Ms. Gaddis-Wyatt,

Here are Grand County's preliminary comments on the Labyrinth Rims/Gemini Bridges travel planning process.

Public lands in Grand County, and more specifically in the Labyrinth/Gemini Bridges area, offer a wide variety of recreational opportunities. We think the top priority for the future travel plan is to make sure that there is a fair allocation of recreational opportunities amongst various groups, even as use numbers increase.

We hope that in the future, hikers, bikers, jeepers, UTVers, river rafters and others will all have ample recreational opportunities in the Laby/GB area. This will not happen by accident. It will require a careful "zoning" approach by the BLM.

In particular, it is important to provide opportunities for quiet forms of recreation, out of earshot of motorized trails. We think the travel plan should ensure that a reasonable percentage of the planning area is more than one mile from a road or motorized trail.

The present road network is not the result of a careful planning process that kept recreational opportunities in mind. Rather, it is largely the result of historical accident, with the location of old seismic lines and mineral exploration routes from decades ago playing a dominant role in where motorized routes are located today. The current planning process is an opportunity for BLM to implement a more rational travel plan that will serve us well decades into the future.

Here are some principles we hope the BLM will keep in mind when constructing the future travel plan. We realize that in some cases these principles will conflict.

- We would like to see a wide variety of motorized recreation opportunities available in the future.
- Areas where quiet recreation is popular should be separated from (i.e. out of earshot of) motorized routes. This includes canyon bottoms, canyon rims, and the Green River corridor.

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- There are very few riparian areas in this semi-desert area, and we don't think it makes sense to place motorized routes in riparian areas.
- Habitat important to wildlife should be protected. This includes, specifically, bighorn sheep habitat.
- Areas with important archeological and cultural resources should be protected.
- The west side of Labyrinth Canyon is designated wilderness, and Grand County has endorsed wilderness for the east side in the past. We think the travel plan should be consistent with likely future wilderness designations in Labyrinth Canyon.

It is our understanding that with the current travel plan roughly 95% of the planning area is within half a mile of a motorized route and less than 1% is more than a mile from a motorized route. This does not seem balanced to us. We hope the new travel plan will result in 15% of the area more than a mile from a motorized route and 30% more than half a mile from a motorized route. We also request that each alternative be evaluated by this metric. In other words, for each alternative studied in detail the BLM should disclose what percentage of the planning area is more than 0.5, 1, or 2 miles from a motorized route. This will help the public and Grand County determine how well each alternative is doing in terms of a balanced allocation of recreational opportunities.

Grand County prides itself in offering a wide variety of public lands recreation opportunities. With careful travel planning, this wide variety can be preserved, despite rising use levels. At low use levels, hikers, bikers and jeepers can all use and enjoy the same trail. The users are not separated in space, but they are separated in time and rarely cross paths. At high use levels this sort of trail sharing no longer works and it becomes necessary to separate different types of use in space rather than time. In other words, it becomes necessary to “zone” the backcountry into non-motorized and motorized areas. If this is done carefully and fairly, then we can look forward to a future where Grand County continues to offer a wide variety of recreational opportunities.

Sincerely,



Mary McGann  
Chair, Grand County Commission