



GRAND COUNTY COMMISSION
Jacques Hadler (Chair) · Mary McGann (Vice Chair)
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Sarah Stock · Kevin Walker

David Pals, Acting Field Office Manager
82 East Dogwood
Moab, UT 84532

Dear David,

Thank you for the opportunity to comment on BLM's draft environmental assessment for the Labyrinth Rims/Gemini Bridges travel planning process.

We have attached a copy of our scoping comments from May, 2021. Alternative B comes closest to meeting the goals we set forth in that letter, and we hope that the final decision resembles Alternative B with only minor variations.

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 in time. In other words, it becomes necessary to establish separate areas for quiet and motorized recreation. If this is done in a careful and balanced way, then we can look forward to a future where Grand County continues to offer a wide variety of recreational opportunities.

What constitutes a balanced travel plan, from the recreational opportunity point of view? The best metric for assessing this is found in Table C.21. It shows the percentage of the planning area that is not close to a motorized route, using various buffer distances to delimit what is considered close. For example, in Alternatives A, C and D, between 91% and 97% of the planning area is less than half a mile from a motorized route, while for Alternative B 78% of the planning area is within half a mile of a motorized route. Thus Alternatives A, C and D do not seem at all balanced to us. Alternative B still heavily favors motorized recreation, but provides for a small but non-trivial percentage of the area (22%) to be out of earshot of a motorized road or trail.

In addition to the above general comments, we have a number of more specific comments:

- Alternative B would close the Gold Bar Rim Trail entirely. We think it would be more appropriate to limit this route to full-sized vehicles only. Full-sized vehicles are, on

average, much quieter than motorcycles or UTVs, so this limitation would help with noise in this high-conflict area, while still allowing some motorized use.

- Alternative B would close most (but not all) routes along the Green River and in the inner parts of Mineral, Hell Roaring, and Tenmile Canyons. We think this is appropriate. Within the planning area, these canyons are among the most important and popular for non-motorized recreation. While Alternative B leaves the large majority of the planning area very close to a road, we think it makes sense to set aside some areas, including these inner Labyrinth canyons, for quiet recreation.
- Riparian areas are rare in the desert, and we think roads and motorized trails should be kept out of riparian areas. In particular, we think Tenmile Canyon should be closed to motor vehicles.
- We urge the BLM to prioritize the protection of big horn sheep habitat in the planning area. In particular, we think BLM should take into account Section III.C (page 11) of the Utah Bighorn Sheep Statewide Management Plan.
- In addition to the options of closing a route entirely or leaving it open for all users, BLM also has the option of designating some routes as administrative-only. We think this designation should be used more widely, and in particular it should be used whenever the main purpose of a route is non-recreational (for example, access routes to stock tanks, SITLA sections, or drill pads).

Public lands recreation is a cornerstone of Grand County's economy and in its various forms a cherished part of living here for most Grand County residents. We appreciate the opportunity to comment as a cooperating agency and look forward to moving ahead with a forward-looking and balanced plan.

Sincerely,

Jacques Hadler
Chair, Grand County Commission