

RECREATION STAKEHOLDERS

November 11, 2015

Lance Porter
District Manager, Canyon Country District
Bureau of Land Management
82 East Dogwood
Moab, Utah 84532

RE: Moab Master Leasing Plan DEIS Recommendations

Dear Mr. Porter:

As representatives of the undersigned organizations and businesses, we ask you to accept our comments on the Moab Master Leasing Plan (MLP) and Draft Resource Management Plan (RMP) Amendments/Draft Environmental Impact Statements (EIS) for the Moab and Monticello Field Offices.

We commend the planning team for their efforts to preserve and protect motorized and non-motorized recreation opportunities in the course of managing oil, gas, and potash development in the project area.

We believe that Alternative D (the agency preferred alternative) provides a substantive foundation for managing both the destination/casual-use recreation and resource industry needs of the area.

However, we believe that Alternative D should be modified by enhancing the site-specific analysis component as it relates to energy/mineral project impacts to destination and/or important motorized and non-motorized recreation facilities.

ENHANCED RECREATION ANALYSIS

Develop a decision matrix for the proposed "No Surface Occupancy" (NSO) stipulations for developed recreation sites, such as overlooks/viewpoints, campgrounds, and trailheads. Decisions should be made on a site-specific basis using criteria and mitigations to address; direct, sound, or visual impacts, conflicts between recreation traffic with industrial vehicles, conversion of recreation routes to "haul" roads, line-of-site vs. topographical based buffers, and post-project restoration of commercial routes back to recreation routes. NSO buffers could extend up to a 2-mile setback.

Apply up to a 1-mile NSO setback from key routes, trails, climbing, canyoneering, and filming location based on site specific analysis using aforementioned decision matrix criteria/mitigation.

"Special recreation management areas" and related "focus areas" should have an additional layer of NSO-related analysis and setback parameters before permitting a resource industry project.

Clarify in the Record of Decision (ROD) that "NSO" does not apply to recreation projects so as to avoid confusion in subsequent site-specific planning efforts.

With the inclusion of our suggested Enhanced Recreation Analysis, recreational interests should be properly protected. Therefore, many of the more restrictive measures placed on locating resource development in Alternative D become unnecessary and the modification to Alternative D should lessen these restrictions.

We believe our recommendations will help the final plan protect both the recreation and extractive industry-based economy in the Greater Grand County Area.

We look forward to working with the agency on this project.

Sincerely,

Don Amador
Western Representative
BlueRibbon Coalition, Inc.

Bob Humphreys, President
Mike Kelso, Vice President
Red Rock 4 Wheelers

Jeff Stevens, President
Moab Friends For Wheelin'

Clif Koontz, Executive Director
Ride with Respect