

ATTACHMENTS B. ADDITIONAL DISCUSSION CONCERNING THE RED ROCK HERITAGE TRAVEL PLAN

On September 7, 2004, BLM received a communication from Red Rock Heritage (dated September 2, 2004), providing narrative to accompany its travel map, which had been submitted earlier in the scoping process. The narrative explains the underlying philosophy and objectives underlying its plan, and offers rationale for not designating specific routes for motorized travel within the BLM Travel Plan. No narrative had accompanied the original map submission. In the current narrative, Red Rock Heritage (RRH) emphasizes that the primary objective of their plan is a "fair allocation of recreational opportunities" between motorized and non-motorized uses. They specifically state that the best practical alternative for comparing travel plans on this dimension is by "measuring the percentage of the field office area within various distances of the nearest motorized trail" (Red Rock Heritage, p. 2). Later in the document, they propose the following:

"Ensure that a reasonable percentage of the Field Office area is at least one mile from a motorized route. This allocation will help maintain a balanced spectrum of recreational opportunities as motorized use continues to increase." (RRH, p.3) On the same page, RRH suggests that the appropriate percentage to achieve this goal is approximately 25 percent.

Near the end of their narrative, RRH provides data with such computations at varying distances from motorized routes, contrasting its plan with the Grand County "spaghetti map" (sic). Nowhere in its document does Red Rock Heritage acknowledge the Grand County Travel Plan approved unanimously by the Grand County Council. This plan recommends elimination of approximately 2,000 miles of "D" roads from motorized travel. BLM feels that the County Travel Plan is a better basis of comparison to the Red Rock Heritage plan, and not the County *inventory* (the "spaghetti map" alluded to by Red Rock Heritage).

BLM agrees with RRH that an equitable allocation between non-motorized and motorized recreation is a desirable outcome of the BLM Travel Plan. BLM believes, however, that the RRH plan is not a viable alternative for several reasons:

1. The RRH plan's roadless polygons match almost identically with wilderness proposals submitted by SUWA and/or other citizens' groups. To achieve this roadlessness, RRH has recommended for closure virtually all roads within these proposed wilderness polygons, without specific mention or regard for purpose and need³. This results in several hundred miles of County "B" roads being recommended for closure. BLM has determined that these roads, which are constructed, regularly maintained by mechanical means, and serve specific purposes and needs, need to be included in all alternatives of the BLM Travel Plan.
2. RRH includes SITLA lands in all their analyses. BLM cannot manage travel on SITLA lands, and BLM confines its analysis to public lands managed by the Moab Field Office.
3. RRH focuses their analyses on lands south of I-70, which leaves out those portions of the field office where opportunities for non-motorized recreation are arguably most available. BLM believes this division is arbitrary, and will focus its analyses on the entire field office area.

³ Per BLM Instruction Memorandum 275, Change 1 (9/29/03), BLM is prohibited from establishing new wilderness areas. BLM *may* choose to manage certain areas to protect wilderness characteristics, but is not required to do so.