



July 24th, 2017

Ms. Sheri Wysong  
% Bureau of Land Management  
170 South 500 East  
Vernal, Utah 84078

**Re: Vernal December 2017 Oil and Gas Lease Sale**

Dear Ms. Wysong,

Please accept this letter regarding the Bureau of Land Management Environmental Assessments (EA) for oil and gas lease sales from the Vernal BLM Field office. This letter is submitted by the International Mountain Bicycling Association (IMBA) and our local chapter Northeast Utah Mountain Bikers (NUMB). Founded in 1988, IMBA seeks to unite the national and worldwide mountain bicycling communities through a network of 80,000 individual supporters, 750 Chapters and supporting organizations, and 600 dealer members. Our Mission is "**to Create, Enhance and Protect Great Places to Ride Mountain Bikes**". IMBA teaches sustainable trail building techniques and has become a leader in trail design, construction, and maintenance. We encourage responsible riding, volunteer trail work, and cooperation among trail user groups and land managers. Each year, IMBA members and clubs conduct more than one million hours of volunteer stewardship on public lands and are some of the best assistants to federal, state, and local land managers. We provide the following comments on the basis that as a quiet human powered form of recreation, bicycles have impacts on natural lands that are comparable to any human activity. Unmanaged recreation always has the potential to create adverse impacts on the environment. However, thoughtful management can avoid those effects while still allowing the public to experience these environments.

**Rural economic benefits of mountain bike access** - we are seeing that across the country and indeed in the western United States that the purposeful development and active construction and management of mountain bike trail systems and infrastructure assets can aid local tourism and provide economic benefits to a community, based purely on a foundation of sustainable recreation and quality of life benefits. or example:

- Mountain bikers contribute an estimated \$25 million to the Fruita, Colorado economy, approximately 15% of the annual budget for Mesa County<sup>1</sup>
- The Intrepid Trails system in Grand County, Utah brought in \$25,000 in state park revenue in its first year open (2009). The same year, 179,157 people visited Dead Horse Point State Park producing an economic impact of \$4.1 million<sup>2</sup>

In fact, we are currently working with many rural communities to develop mountain bike trail networks to serve as valuable recreational and educational facilities for local residents, while serving as economic engines attracting visitors to these areas. These networks allow residents and visitors to experience natural landscapes as they recreate in these communities, including:

- Caliente, NV where we are working with the Bureau of Land Management (BLM - Caliente Field Office); Nevada State Parks; City of Caliente; Lincoln County Commission; and Lincoln County Regional Development Authority. We currently have designed around 40 miles of multi-ability trail, with the potential for an additional 100 miles of new trail.
- Superior, AZ where we are working with Tonto National Forest; Resolution Copper; and the City of Superior. Here we are working on a conceptual plan for 75-100 miles of new trail and see that this project stands to attract many thousands of visitors due to the proximity and ease of access from Phoenix, AZ.
- Cedar City, UT where we have completed a master plan for around 75 miles of new trail construction, close to town and easily accessible from Interstate 15. Approximately 12 miles have been completed and they currently see around 1,500 rider-visits per month. Construction here will continue in fall 2017 and again in 2018.

**Specific comments on the Environmental Assessments** - we have significant interest in this Environmental Assessment (EA) process in Vernal, UT because our members recreate and live in close proximity to the areas identified for oil and gas leasing. Additionally thousands more riders visit the area to recreate bringing valuable and long term sustainable tourism dollars to the region. While we certainly support the prudent development of energy resources on our public lands, we are concerned that the longstanding recreational opportunities and the economic benefits that they bring (and potential for growth) to the area could be irreparably harmed by large-scale oil and gas extraction if the recreational assets are not considered, assessed, and valued on equal ground with the mineral resources. Such extraction could also put at risk sensitive water resources and threaten other important values such as clean air, wildlife habitat, cultural resources, recreation viewsheds, and the cultural vitality of rural communities. Before the BLM permits any new commercial leases for oil and gas extraction, we recommend that the research is made public, which demonstrates that proven extraction technologies will not cause unnecessary harm to the area natural resources, and that it will indeed provide long term benefits, outweighing those mentioned above.

**Guidelines for a Quality Trail Experience** - nationally, the BLM is moving to a management style for public recreation that is experiential-based management. This style focuses not only on quantity of access points, but the quality of the experience provided. The Washington office of BLM, in cooperation with IMBA, have recently published the [Guidelines for a Quality Trail Experience](#) (GQTE). In this agency guideline document, it makes clear that the multi-use mission and mandate of the BLM is to “sustain the health, diversity, and productivity of America’s public lands for the use **and enjoyment of present and future generations**”. This demonstrates that intent of the BLM to balance the productive use (resource extraction) with the enjoyment (quality recreation) for present and future generations. Quality is difficult to define but easy to recognize. In the BLMs own words from the GQTE, “excellence is realized when a trail design merges the desired outcomes and difficulty that the rider seeks **with the setting in**

**which the outcomes are realized**". The GQTE continues with "these variables ultimately equate to an overall level of sustainability that protects resources while simultaneously providing a rider with the outcomes they seek. Quality implies a sincere commitment to attaining the highest practical standard." This focus on a quality experience is inherently linked to the setting in which it is provided. In effect, this means that all the access in the world is meaningless if the experience upon arrival is subpar. The public will simply not return and therefore the "access" is effectively lost.

In these comments on the Vernal EAs, maintaining a quality setting even beyond the trail features and design, is of critical importance since the effects and impacts of the adjacent management actions being assessed in these EAs could override any and all future trail design value. If oil and gas development is not managed in a way that balances the value of the mineral resources with the value of the recreational experiences than the BLM will have effectively cut the access out of the multi-use mandate management equation. Therefore, we urge the BLM to thoughtfully assess the value of the recreational amenities and the public enjoyment of the land for present and future generations on par with the need and/or desire for development of the mineral resources so as to actively manage the resource development activities in a way that purposefully protects the settings and therefore the experiences of the public recreation. The BLM is a federally funded public land agency, as such, federal dollars for management and specifically for recreation has been in short supply and dwindling every year. It's imperative, then, to manage recreation and other uses in the most fiscally prudent manner possible so that existing assets are valued, retained, and emphasized in manner that maximizes their public value and minimizes the ongoing management burden. This can be achieved with smart benefit- and experienced-based management techniques that assess the impact of actions of the setting experience.

For the ***Vernal December 2017 Oil and Gas Lease Sale***, the EA analyzes 64 parcels comprising 66,626 acres within Duchesne and Uintah counties, including approximately 2,080 acres of split-estate land. Air quality, cultural resources, lands with wilderness character, special status plants and animals, wildlife (including Greater Sage Grouse), and visuals are some of the key resources analyzed in detail. The following trails are located in this area, with our concerns and solutions listed next to each:

- The existing EA does not include the McCoy Flats trail complex in the list of recreation sites analyzed. McCoy Flats has been shown to be one of the most visited recreation sites in the Vernal Field Office by BLM traffic counters. Since that time, visitation numbers have increased each year. In addition, McCoy Flats is listed by the BLM as one of the "Top 20" mountain biking sites on BLM lands. There are at least two parcels near the McCoy Flats complex, and we would like the potential impacts addressed specifically for this site. We are also concerned about visual resources impacts and increased noise impacts that might degrade the user experience. There are two trails that pass through the proposed lease parcels, described below.
- Retail Sale Trail is 6.1-miles in length and popular with with intermediate riders as it can be ridden as a loop, offering scenic views and a moderately challenging experience. We recommend that all extraction infrastructure is located at least 2,500' from any point on this trail, in order to maintain the current experience that it offers and to avoid visual

resources and noise impacts. We would also like stipulations to include the best available technology to reduce noise from any potential well infrastructure.

- Slippery When Wet Trail is 5-miles long and is connected to the larger stacked-loop trail system at McCoy Flats. This trail offers a more technically challenging experience for advanced riders and we request that there is no impact to the existing trail from any infrastructure.
- The 2008 Vernal Resource Management Plan stipulates that there shall be no surface occupancy on developed recreation sites. We consider the McCoy Flats Trail Complex as a whole as a developed site, since the trails have seen considerable BLM and NUMB investment of time and resources in their creation, development, and continued maintenance.

Ms. Wysong, to reiterate our position, we can support wise management of oil and gas extraction when it's conducted in appropriate locations and managed to minimize impacts and accounts for current recreational uses. We hope that this letter outlines our concerns and recommended solutions in order to find the optimal solution for all parties. Please feel free to contact me if you have questions about our positions or about IMBA and NUMB in general. I look forward to hearing from you.

Sincerely,

A handwritten signature in cursive script that reads "Patrick Kell".

Patrick Kell  
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