

October 7, 2022

Re: Draft Labyrinth/Gemini Bridges Travel Management Plan

The Specialty Equipment Market Association (SEMA) appreciates this opportunity to provide comments to the BLM on the draft Labyrinth/Gemini Bridges Travel Management Plan (TMP). SEMA is concerned with the Travel Management Plan's failure to offer any alternatives that open more OHV routes, even though motorized recreation in the area has almost doubled since the last TMP in 2008. SEMA supports Alternative A of the draft TMP.

SEMA represents the \$50 billion specialty automotive industry comprised of 7,500 mostly small businesses nationwide that manufacture, retail, and distribute custom parts and accessories for motor vehicles. The industry produces performance, restoration, and enhancement parts for use on passenger cars and trucks, collector vehicles, racecars, and off-highway vehicles. Products range from wheels and tires to engines, exhaust systems, lighting equipment, suspensions, truck caps, leather seating, mobile electronics, and more.

Introduction

Modifying off-road vehicles is a large revenue source for many SEMA businesses. As such, SEMA is a strong advocate for responsible off-roading, overlanding, and outdoor recreation. In 2008, the BLM implemented a TMP for the Labyrinth/Gemini Bridges area that closed over 40% of inventoried OHV routes and around 200 miles of non-inventoried routes, which struck a compromise between motorized recreation and non-motorized recreation and natural resources. SEMA strongly supports Alternative A of the draft TMP that would maintain all of the OHV trails that have been open since the 2008 TMP. SEMA opposes Alternatives B, C, and D since they would close trails without due consideration.

Increased Motorized Activity

As motorized activity has become increasingly more popular in the Labyrinth/Gemini Bridges area, nearly doubling since 2008, it is concerning that the draft TMP lacks a basis for its assertion that only 7,348 visitor days (20 people per day) would be lost annually if Alternative B were chosen. Alternative B, which would close almost 40% of existing trails, along with Alternatives C and D, which would close fewer routes, could decrease the sustainability of trails by funneling the increasing number of motorized users onto fewer open trails. Another potential impact of closing trails is more use of non-designated routes which would disorganize travel patterns and increase negative impacts.

Economic Impact of Motorized Activity

The draft TMP does not provide evidence for its assumption that all types of visitors spend similar amounts of money to recreate in the Labyrinth/Gemini Bridges area. Research demonstrates that most motorized trail users spend may spend up to five times more money than other recreationists. Rental OHVs average \$300 per day in Moab while most non-motorized gear rental is under \$100 per day. Closing any number of motorized trails would decrease positive impacts to the local economy that have come along with the increase in OHV activity in the area over recent years

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Motorized Activity is an Appropriate Activity

All four alternatives of the draft TMP violate National Trail System Act requirements, which recognize motorized access as an appropriate activity. The draft TMP is required to provide a range of alternatives that address all viable management options, which has not been done, as none of the alternatives would open more OHV trail routes. Additionally, Alternatives B, C, and D seek to close areas on and around the Old Spanish Trail to motorized usage even though they serve an important and legitimate recreational value.

Quality Mapping Data

The draft TMP does not utilize quality mapping data, as many globally recognized routes are only partially reflected in the TMP data provided to the public. Some of the routes are shown on the pdf version of maps for a particular alternative but are not shown on GIS based maps and vice versa. Numerous Easter Jeep Safari Routes would be lost for this reason alone. Without quality trail mapping data, the alternative options in the draft TMP cannot provide an accurate analysis.

Motorized Access and Camping

Camping issues are not recognized in the draft TMP, and therefore the TMP cannot address spur routes to legal camp sites when there is not a decision identify what these campsites are moving forward. Many OHV routes that are listed involve camping access. Access for camping in the area must be addressed as this is a critical component of the recreational experience that the area is required to provide.

Conclusion

SEMA urges the BLM to adopt Alternative A, the current route system, which offers 1,127 miles available for OHV use. SEMA opposes Alternatives B, C, and D which would have a significant negative impact on off-roading in the area, decrease the positive impacts OHV users bring to the local economy, and potentially decrease sustainability of trails by funneling more motorized recreation onto a smaller number of trails.

Thank you for your consideration of these comments. Please feel free to contact me if you have any questions.

Sincerely,



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