



Attention: Planning Project Manager
C/O Bureau of Land Management

March 23, 2018

Re: Official Comments on Resource Management Plan Amendment Environmental Impact Statement and Travel and Transportation Plan Environmental Assessment

A. Background

Southern Nevada Mountain Bike Association

The Southern Nevada Mountain Bike Association (SNMBA), a chapter of IMBA, is a non-profit organization based in Las Vegas with the mission to promote, improve and protect mountain biking in Southern Nevada. The organization is made of 11 board members and currently has about 120 paid member interests and 2300+ Facebook followers. As a predominant user group of BLM land, we feel that it is important to clearly state our position to be considered in the RMP.

The organization's goals are to:

- work collaterally with government and private entities and other trail organizations to achieve a world class trails network that provides opportunities for all abilities, interests, and skill levels
- to assist in the planning, design, and construction of new trails and trail opportunities in Southern Nevada
- to assist in maintaining current and future trail infrastructure, including preserving the trail objectives for which each trail was created
- to educate current and future mountain bikers and other trail users on proper etiquette and trail sustainability

- to provide the opportunity of community ownership in the trails system, including adopt-a-trail programs, youth group riding, and other volunteer opportunities

During the process of developing this response letter, data and comments have been gathered from member interests, bike shops, and other mountain bikers at large.

There are many miles of existing recreational trails within the proposed RMP, most of which we are diligently working in a partnership with you to authorize and legitimize. At the present time there are many hundreds of recreation trail users including mountain bikers, runners, hikers and horseback riders enjoying them jointly.

There is a Memorandum of Understanding (MOU, see attached) between us, the purpose of which is to develop a framework for cooperation between Bureau of Land Management (BLM), Red Rock/Sloan Field Office (RRSFO) and the Southern Nevada Mountain Bike Association (SNMBA). It addresses the mutually beneficial programs, projects, training and other recreational activities that may be accomplished by both parties on BLM – managed public lands.

The Department of Interiors Office of Congressional and Legislative home site, reads from July 26, 2016, “Las Vegas is home to nearly 2 million people, the famous Las Vegas Strip, spectacular desert landscapes and historic, cultural, and paleontological treasures.” Balancing the protection of these important natural, cultural, and scientific resources with economic development and growth is a challenge “EMBRACED” (Emphasis added) by the BLM. State Director John F. Ruhs himself added his quote, “Improving Federal Land Management and use to better serve Las Vegas Valley Communities.”

We believe that a community with 2 million people in, it needs a large and well managed recreational trail system. Many Land Management Agencies and communities are coming together throughout the Country on mountain bike projects, and their successes are many. (Ref to www.imba.com)

The recent Clark County Ridge Recreation Study and Master Plan found mountain bikers to be the predominant user group of the study area, with a whopping 77% of respondents reporting that they use this particular open space to recreate on their bikes. This statistic show mountain bikers are highly utilizing Las Vegas’ open space and are a voice that should be strongly considered when planning overall public land management matters. www.clarkcounty.gov

Although we direct our comments to the entire RMP, the two specific areas most concerning, that mountain bikers and outdoor enthusiasts alike frequent, are connected to the Red Rock Conservation Area on its NE & SE adjoining side to the BLM-RMP proposed section. Better known as the White Mesa (Bear’s Best), Desert Hills and Alexander trails. See Map attached, and go to <https://www.trailforks.com/region/southern-nevada/>

BLM Lands and Resources

The Bureau of Land Management Las Vegas Office (BLM) manages 3.1 million acres of land within Clark & Nye County. The public lands in Southern Nevada contribute to the quality of life in the region, providing areas for outdoor recreation, scenic open space and protection to wildlife. Southern Nevada also has a very high concentration of endangered and sensitive candidate species to preserve as we grow. Protecting public lands and recreation resources is vital to the success of the region's economy.

Needs and Issues

This Travel and Transportation Management and RMP Amendment process is a chance to address changes in demographics and improved resource science to provide the protected urban interface and backcountry natural areas for quiet recreation that citizens want. There is also a great need for a non-motorized recreational experience to be preserved in this RMP amendment. SNMBA has identified the following list as our highest priority issues for this process.

- Establish and maintain "quiet" recreation areas for mountain bikers and other non-motorized recreation
- Continue to work with the BLM in designing and developing sustainable single track trails
- Maintain all the official trails that are currently recognized by BLM
- Preserve and protect highly utilized disposal areas
- Continue to be a partner with the BLM field office by identifying areas that have potential for future mountain bike and non-motorized trail development to increase the opportunities and spectrum of experience
- Continue to designate trails for preferred use, and in some cases for mountain biking only
- Protect BLM's investment by designating specific trails for OHV use away from non-motorized single track.

Additional concerns include:

- maintaining urban interface lands in public ownership
- acquiring key lands to enhance recreational trail connections
- and enforcement of illegal OHV use in non-motorized zones

Cooperation between BLM and SNMBA

As a new recreation planning partner organization, SNMBA is developing a relationship with the BLM. Our organization and its members are willing to help maintain and preserve existing trails as well as help with design and construction of new trails. SNMBA plans on building a responsible and mutually beneficial relationship, by utilizing the tools of cooperative agreements, adopt a trail programs, grant writing, and other volunteer fundraising and support that will sustain the trails in our area.

Existing Trail Inventories: (available at <https://www.trailforks.com/region/southern-nevada/>, www.mtbproject.com , and www.strava.com)

There are at least 10 approximate trail areas totaling approximately 250 miles in the Las Vegas Valley. They exist on Private, Public, County and Forest Service land. Some solely on one property and some spanning two or more. For the purpose of this RMP comment, we are averaging and estimating as a true survey has not been done. They have been and are at the present time being “Socially” advertised on the above recreation trails sites. Many bike shop owners and businesses are experiencing encouraging influxes of recreation users from out of town who are coming for the unique experience that Southern Nevada provides with the existing trails we have. Most, if not all have been built matching IMBA’s best practices of sustainability. Obviously the “unknown” trail builders have taken a great deal of care in this regard.

If the existing trails can be developed as a formal system, with signing, being fully mapped and ultimately legitimized, we will find all the benefits that many other communities are enjoying.

- Improved conditions of life
- Proven health benefits of outdoor activities
- Economic benefit, increased business and jobs
- Encouragement of healthy family activities
- Education about and connection to our natural environment
- Create, cause and refresh a new sense of community
- Demonstrate the value of Public/Private relationships

Further, if we can authorize these trails for commercial and competitive events, the benefits and recognition to the Las Vegas Valley will grow exponentially.

The board of the SNMBA encompasses some very hard working trail advocates, and they are looking forward in growing our relationship with the BLM. As board members, we plan to continue these efforts by building a local constituency of advocates and developing extensive user education programs that build on previous efforts and increase them as the mountain biking community becomes more aware of the available trails in the area.

B. Approach to Planning

Management Zoning of BLM District

Travel and Transportation designations and management cannot be decided in a vacuum without also considering recreation and visitor services. The BLM Land Use Planning Handbook (H-1601-1) clearly states that recreation and visitor services planning should be done during the Travel Management process. BLM has very clear policies, strategies, and tools to deliver the very best in visitor services and recreation management within a field jurisdiction. These include using the Benefits Based Management (BBM) approach as the principal method to establish and describe management goals, objective, and prescriptions within a plan. Without

the use of BBM and other zoning and experience based tools the prescriptions, designations, and closures within a plan will be without a basis, especially in the case where no overriding resource issues is the sole purpose for an action. SNMBA suggests this is the best response to solve issues in this planning effort.

Benefits-Based Planning & Management (BBM)

BBM is the application of managing recreation resources which focuses on the positive or beneficial outcomes derived from engaging in recreational activities rather than just on the recreation activities themselves. BBM provides the conceptual recreation framework to view, plan and collaboratively deliver recreation services as a means to a larger end – outcomes that

benefit individuals, communities, economies and the environment. (BLM IM 2006-060)

Action/Policy: This IM affirms BLM's corporate commitment to change its framework and emphasis to benefits-based recreation management. All new and on-going LUPs shall incorporate and implement policy contained in Appendices C and D of the LUP Handbook.....

The methodology for arriving at various zones includes considering existing Recreation Opportunity Spectrum (ROS) values, social and biological carrying capacity, current and future outcome goals for the land, resources, and human experiences, and existing transportation patterns. This methodology will then result in the desired ROS visitor experiences type. These zones can be prescribed in broad based terms over an entire field office during transportation planning, or can be divided into more specific management prescriptions and actions for more intensely managed areas such as NCA's, SRMA's, and ACEC's. In addition, this methodology can assist in identifying areas which may be potential candidates for SRMA's designation. The Utah Santa Clara River Reserve Recreation and Open Space Plan (ROMP) is an excellent example of the use of BBM and Zoning. The Colorado Canyon NCA Management Plan is also an excellent example of NCA planning for its use of zoning and BBM and ability to balance managed recreation with resource preservation in a justifiable and defensible plan that has clear direction for implementation

Preferred Use not Multi-Use

The trend for trail management over the last 20 years for the Bureau of Land Management, the National Forest Service, and many municipalities has been "multiple-use." This was true unless a user group was eliminated either by area designation (i.e. wilderness), or terrain (i.e. narrow canyon with water). This was true, as well, because management practices focused on regions rather than trails, and solely on resource impacts rather than sustainable design and human experience. On many public lands use numbers were low, trails were user created or retooled from roads, and conflict encounters were rare.

Today these lands and resources are at the edge of the urban interface for many communities and the trend for trails management needs to shift from a “Multiple-use” focus to one of “Preferred use.”

This idea considers the landscape terrain, soils, and other environmental conditions along with the desired experience of various users, makes an up front design decision about trail designation to balance use and conflict, and establishes goals and objectives by which these trails will be managed. The outcome of the process may create several “single use” trails rather than one multiple-use trail. It also aims at balancing novice trails with expert trails to achieve a higher level of user satisfaction and to avoid the “sanitation” of trails to accommodate increased use.

Adjacent Lands

To provide better continuity, connection, and protection BLM should continue to identify adjacent private, state, and tribal lands with which to cooperate on trails and resource protection as identified in the BLM’s RMP 1999, page 2.37 Recreation Objectives, and sections RC-09, RC-14, RC-16, RC -17 . As roads, routes, and trails are designated during this RMP amendment process it is imperative the adjacent linkages, experiences, and resources be factored into the decision making process. In addition, many non-motorized routes are located on lands slated for trade or disposal. Once these trails are designated a subsequent BLM reservation or conservation easement should be placed on the corridor, with appropriate open space buffer, to protect the values and connections in which the routes were established and to protect from future development impacts.

C. Special Recreation Management Areas (SRMA)

The tools of benefits based management (BBM) should be used to develop and refine the management and visitor services within the Entire: Resource Management Plan Amendment Environmental Impact Statement and Travel and Transportation Plan Environmental Assessment

With both the explosion in population and tourism over the last 10 years there is a true need to manage many of our lands and non-motorized trail systems along the urban interface of the county’s communities. SNBMA feels that the most logical time to address these designations is during this travel management process. By going through the process and analysis for SRMA designation travel and trail route designations and decisions will become more justifiable and defensible in light of the protection of certain recreational experience values and goals.

SRMA’s provide for long-term recreational opportunities for a specific outdoor experience such as climbing, horseback riding, mountain biking and hiking, or even Off-Road Playing. SRMA’s provide well-defined logical management boundaries that establish priorities for management that includes a combination of natural features and specific recreational activities that are unique and desirable for recreationists and the public. BLM should consider

new Special Recreation Management Areas be created for quiet, traditional uses such as mountain biking, hiking, wildlife viewing, and heritage tourism.

SNMBA supports this process for all existing and future development areas for recreational trails in the entire RMP, as they become available to nominate.

Respectfully Submitted,

David A. Spicer
SNMBA- Acting Interim President, Board Member
Trails-Ov President

Attached: Maps, M.O.U.