

# APPENDIX A — WRITTEN PUBLIC SCOPING COMMENTS

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## INTRODUCTION

This appendix contains public comments received during the scoping period for the Amendment of the 1999 St. George Resource Management Plan (RMP) and associated RMPs for two National Conservation Areas (NCAs). This includes comments received in all formats (i.e., hard copy letters and emails). All of the comments submitted during the scoping period were read and individual comments were identified and entered into an Access database. Each comment was categorized by topic. Comments that addressed more than one topic were placed in more than one category, thus some of the comments are repeated in this appendix.

As these comments are taken from public submissions, they may contain inconsistencies in terminology, acronyms, references, or inconsistent or inaccurate policy statements. These were not corrected in this appendix. Terminology and acronyms were carried over from the original comments without an attempt to interpret or define them. In addition, comments that contained verbatim identical text were not duplicated in this appendix or in the comment or issue analysis, as the National Environmental Policy Act (NEPA) or the Federal Land Policy and Management Act (FLPMA) does not require or encourage accounting for simply the number of comments (e.g., votes), but the addressing and identification of issues to consider in the environmental impact statement (EIS).

## BEAVER DAM WASH NCA

**Comment:** Attn. Project Manager: Please be advised the Act specifically allows historical grazing to continue in the Beaver Dam Wash NCA. Season of use and number should not be adjusted.

**Comment:** The Act also states historical use should be enhanced and protected. This includes use of trails and roads, accessory fences, pipelines, salt grounds and cattle gathering areas. The wash bottom should also be open to motorized travel as this is naturally restored annually by floods.

**Comment:** The Beaver Dam Wash maps do not show roads or through roads that exist. This area needs further review.

**Comment:** I am a horse owner in Washington County and I enjoy riding on the available trails in the area. I would like to see the trails in the Beaver Dam Wash and the Red Cliffs National Conservation Areas continue to be available for horse riding. I would like to see more trails set aside for hikers, bikers, and horse riders.

**Comment:** Access roads through NCA cut off access to Nevada. In consistent road management between UT & NV BLM management area. Keep roads outside of NCA open for access.

**Comment:** NCA area Beaver Dam - All the roads seem to be closed - not right. There are lots of roads & trails no longer open. Warner Valley open OHV to the State line.

**Comment:** Our search & rescue team will take anyone on trails to GPS.

**Comment:** As far as the Beaver Dam Wash being closed from ATV use - I would comment it should be left open. Reason being floods take tracks out and you don't have lasting tracks.

**Comment:** The NCAs should be managed for Conservation values (the “C”!) rather than recreation. This means that off-highway vehicle (OHV) use should be restricted so that it does not those areas with wilderness character or lands in the NCAs. These restrictions should include outright prohibition in lands with wilderness character and lands included in the Red Rock Wilderness Act.

**Comment:** I am writing to urge the BLM to conduct a wilderness inventory inside areas designated for such protection in America’s Red Rock Wilderness Act. Such lands not yet protected by Congress do deserve it. Also, I would like to urge BLM to protect these lands by restricting ORV use in these areas. ORVs have hugely significant impact on wilderness values and wildlife.

Please find ways to close unnecessary and ecologically damaging ORV routes in the Beaver Dam Wash and Red Cliffs Conservation Areas, the routes that extend into the northeast corners of the Canaan Mountain wilderness and the Red Mountain wilderness areas, and also eliminate domestic livestock grazing to protect the unusually large number of sensitive plant and animal species there, including the desert tortoise.

**Comment:** Red Cliffs & Beaver Dam Wash National Conservation Areas

The soils, vegetation, and ground-dwelling wildlife of the Red Cliffs and Beaver Dam Wash NCAs are directly vulnerable to certain kinds of land uses and activities. In particular, I am concerned about roads and motorized use in both NCAs. I encourage the BLM to look, first and foremost, at the values at stake and define management from there. The NCAs have been designated to “showcase BLM’s conservation side,” and when in doubt of the impacts of motorized uses (and also grazing activities in the Beaver Dam Wash NCA) upon resource protection, species conservation, habitat restoration, sustainable recreation opportunities, and visual resource management -- I urge the BLM to exercise a conservative approach, restricting such potentially destructive activities. As part of this approach, roads should be minimized, with closure of existing redundant and ecologically damaging routes.

**Comment:** As a member of a family who has been ranching on the Beaver Dam Wash for five generations, going back nearly 100 years, I believe it is important to continue to recognize the importance of grazing in the newly formed national conservation district. Grazing in this area has been of significant historical, cultural, and economic importance in Washington County and the region for several decades. Current ranching practices including gathering cattle, checking and maintaining water lines, fencing, and all other aspects of a ranching operation need to be allowed under the guidelines of the conservation district. Working, successful ranches have, and can continue to provide an important cultural and educational aspect of the Beaver Dam Wash Conservation Area.

**Comment:** Roads in the Beaver Dam should be limited to minimize their impact on the NCA areas.

**Comment:** Eliminate livestock grazing in the Beaver Dam NCA. Grazing threatens the health of the entire ecosystem.

**Comment:** I live in Washington County and am glad to have this natural habitat so close to my home. However, I am concerned with the frequent ATVs driving around, gunshots in signs, and for my safety when I am alone hiking in this area. Why does this area need to be developed further? Shouldn’t we have ANY lands that can remain as they are???

Why can’t the natural wildlife habitat continue to roam freely in this area? My idea of the BLM is to protect the public lands – not waste them. Why can’t there be “primitive zones” in areas to restrict off-road vehicle travel, protect sensitive species, and ensure that these areas retain their wilderness character? I also don’t think these lands should be available for grazing cows and more pollution from methane

gases. We don't need any more roads in these areas. The ones that already exist should remain primitive. Have you ever been out to Canyon lands or Arches or Death Valley? These are by far the best of the national parks because they have remained "rather" undeveloped (unlike the South Rim of the Grand Canyon and Yosemite Valley). Here in southern Utah, I like so many other people, came to escape the city. Do not ruin these public lands for people like us who use them with no impact.

I support conservation of Beaver Dam Wash and Red Cliffs NCAs to protect the sensitive, plants, animals and other resources in Washington County.

**Comment:** I am writing to ask BLM to protect the lands proposed for wilderness designation in ARROWA but not yet protected by Congress by restricting ORV use in these areas. ORVs have a significant impact on wilderness values and wildlife, and ORV routes fragment wildlife habitat and entire ecosystems. Additionally, I ask BLM to eliminate domestic livestock grazing in the Beaver Dam Wash and Red Cliffs NCAs. Domestic livestock grazing is incompatible with the protection of the ecological values and sensitive species in the Mojave Desert. Grazing threatens the health of the entire ecosystem.

**Comment:** The BLM should protect the lands proposed for wilderness designation in ARROWA but not yet protected by Congress by restricting Off Road Vehicle (ORV) use in these areas. ORVs have a significant impact on wilderness values and wildlife, and ORV routes fragment wildlife habitat and entire ecosystems. Please identify manageable off-road vehicle trailheads to ensure that ORV use does not impact the NCAs, wilderness areas, or other lands proposed for wilderness in ARROWA. In particular, the BLM should close redundant, unnecessary, and ecologically damaging routes within the Beaver Dam Wash and Red Cliffs NCAs in order to protect the multitude of sensitive plant and animal species there, including the desert tortoise. All vehicle routes designated within the NCAs should serve the conservation-focused purpose and need of the NCAs and minimize impacts to resources as required by law.

**Comment:** Please manage Water and Short Canyons on the south side of Canaan Mountain for non-motorized use. These canyons are proposed for wilderness in ARROWA and are not appropriate places for ORV use. The BLM should also close both of the routes that extend into the northeast corners of the Canaan Mountain wilderness and the Red Mountain wilderness areas because they are incompatible with the wilderness values of the areas. And please close, or limit to non-public administrative use only, the routes in the Designated Road area of the Beaver Dam Wash NCA in order to protect fragile habitat for the desert tortoise and other sensitive species.

**Comment:** I also encourage the BLM to eliminate domestic livestock grazing in the Beaver Dam Wash and Red Cliffs NCAs. Domestic livestock grazing is incompatible with the protection of the ecological values and sensitive species in the Mojave Desert. Grazing threatens the health of the entire ecosystem.

**Comment:** My main comment is to carry forward the conservation mandate of these NCAs: "The Congressionally-defined purposes of the new NCAs are: to conserve, protect, and enhance for the benefit and enjoyment of present and future generations the ecological, scenic, wildlife, recreational, cultural, historical, natural, educational, and scientific resources of each unit." Given that there is proposed wilderness (under the America's Red Rocks Wilderness Act proposal) in each of the NCAs, I believe that stewarding the qualities that potentially qualify these areas for wilderness is an important priority.

There are several management approaches that I would like to see the BLM implement to help protect unique, biologically sensitive resources in the NCAs. One is to create backcountry hiking recreation zones in the areas where proposed wilderness overlaps with the NCAs. Another is to limit roads and motorized uses in the NCAs, especially in ecologically sensitive areas and those lands proposed for wilderness designation. And finally, I urge the BLM to dismiss the Northern Transportation Corridor option that

passes through the Red Cliffs NCA. This would compromise the entire area, and undermine the conservation effort. Please advocate for the expansion of the Redhills Parkway, instead.

**Comment:** The Northern Corridor has been a contentious issue for most of the years during which I've lived in Washington County. Political forces have attempted to push a corridor through the heart of the Reserve while many of us and some in positions of knowledge and authority have fought this. Dr. William Mader, former head of the HCP felt that a road through the heart of the Reserve would not serve the best interest of the tortoise population and favored a road at the southern part of the Reserve – where the current Red Hills Parkway could be expanded – that would take a minimal amount of land from the Reserve and not serve to potentially decimate the tortoise population. Considering that the land already taken for the road's expansion has not been repaid by the government entities responsible for that, I would not want to see them allowed to take land in other areas since the chances seem slim of recovering something comparable. The „Great“ Northern Corridor, which would pass across the upper boundary of the habitat, is another option that should be considered. Although the costs associated with this far-north option would probably be higher than other options and there may be some other wildlife concerns with which to deal, it might serve to get people where they want to go more quickly and if used as a toll road might help to mitigate some of the expense. Even the local paper weighed in on this issues not long ago with the comment:

“Yes, there are some inconveniences. A road to connect Interstate 15 on the east and State Route 18 on the west would be convenient and save time, particularly for anyone traveling to or from the Hurricane area. But the benefits of the plan are far greater by preserving the views that many people treasure while also helping creatures that otherwise might struggle to survive.”

Although some of our politicians, developers and general populace might believe that an “expedient” route is the preferred, expediency is not the only consideration in this decision. There have been several public transportation meetings on this matter, which I've attended. From those meetings it's been apparent to most of us that a Northern Corridor that bisects the Reserve NCA is not what's wanted and is not in keeping with the true intent of the HCP. In fact, my understanding is that the HCP itself addresses the idea of a traffic corridor that would bisect the habitat and states this would not be in the best interest of the area's wildlife and would actually violate the HCP provisions. Some of us who may be considered skeptical by nature see the efforts by local government officials as a poorly cloaked attempt to undermine the health and wellbeing of the tortoise population by putting pressure on the BLM that prevents them from doing what is truly needed to preserve this habitat, thereby eliminating the need for the HCP at all. If so, I hope that the local politicians and developers are eventually faced with returning to the situation prior to the establishment of the HCP and have to endure lengthy and costly environmental reviews for any development in the 300,000 plus acres that were set aside when the Reserve was established. They made an agreement in good faith and should be willing to stick by that agreement not be able to manipulate the process to meet their own needs.

**Comment:** I urge the BLM to close redundant, unnecessary, and ecologically-damaging vehicle routes in the new Beaver Dam Wash and Red Cliffs NCAs. These NCAs include several rare and/or endangered species of flora and fauna—including the desert tortoise—that require protection. I also request that the vehicle routes that are designated within these NCAs serve the conservation-focused purpose and need of the NCAs and minimize impacts to resources as required by law. The BLM should also close, or limit to nonpublic administrative use only, the routes in the Designated Road area of the Beaver Dam Wash NCA in order to protect fragile habitat for the desert tortoise and other sensitive species. I urge the BLM to eliminate livestock grazing altogether within the Beaver Dam Wash and Red Cliffs NCAs. Livestock grazing is simply incompatible with the protection of the ecological values and sensitive species within these NCAs. Livestock grazing of invasive species disturbs the natural ecosystem and native plant and animal species.

**Comment:** Conduct a wilderness inventory of the lands proposed for wilderness designation in America's Red Rock Wilderness Act (ARRWA) that have not yet been protected by Congress. Protect the lands proposed for wilderness designation in ARRWA but not yet protected by Congress by restricting ORV use in these areas. ORVs have a significant impact on wilderness values and wildlife, and ORV routes fragment wildlife habitat and entire ecosystems. Identify manageable off-road vehicle trailheads to ensure that ORV use does not impact the NCAs, wilderness areas, or other lands proposed for wilderness in ARRWA. Close redundant, unnecessary, and ecologically damaging routes within the Beaver Dam Wash and Red Cliffs NCAs in order to protect the multitude of sensitive plant and animal species there, including the desert tortoise.

**Comment:** Eliminate domestic livestock grazing in the Beaver Dam Wash and Red Cliffs NCAs. Domestic livestock grazing is incompatible with the protection of the ecological values and sensitive species in the Mojave Desert. Grazing threatens the health of the entire ecosystem.

**Comment:** I hope the BLM will formulate and implement strong resource management plans for the Red Cliffs and Beaver Dam Wash National Conservation Areas (NCAs) and the Washington County-wide travel plan. As a longtime visitor to Zion and other areas of the Utah Red Rock country, I believe these federally-owned lands merit the strongest possible protection.

**Comment:** Please maintain domestic livestock grazing in the Beaver Dam Wash and Red Cliffs NCAs. Domestic livestock grazing is compatible with the protection of the ecological values and sensitive species in the Mojave Desert. Grazing do not threaten the health of the entire ecosystem.

**Comment:** Please do not close, or limit to non-public administrative use only, the routes in the Designated Road area of the Beaver Dam Wash NCA. Designated motorized trails do not threaten any species. No cases of species loss has been verified.

**Comment:** I urge you to focus on restricting off-road vehicle use, which has already damaged many areas in the desert Southwest. It is time, I believe, for the BLM to promote conservation, preservation, and non-destructive recreation, particularly in beautiful areas with wilderness values such as the areas to be managed by the BLM in Washington County. Off-road vehicles should be prevented from entering areas proposed for wilderness designation in America's Red Rock Wilderness Act. As you surely know, ORV and their often irresponsible drivers regularly enter ecologically sensitive areas, such as streamside sites, and do irreparable harm there. Keep them out please. This applies particularly to Beaver Dam Wash NCA and Red Cliffs NCA.

**Comment:** I am writing as a biologist, teacher and citizen to urge the BLM to support conservation of the wilderness areas and NCA's in Washington County. I have taken my university students on field trips to the Beaver Dam Wash area for years. It is a wonderful example of habitats and makes for a productive learning experience. I have also hiked for personal pleasure in many BLM areas across the country. In almost all areas, the vegetation suffers from overgrazing, which reduces its value for wildlife, disturbs sensitive plants and increases dust. Over the years, the impact of ORV has been growing and is increasingly destructive. Please limit these activities and designate areas as primitive. Areas with wilderness value will only become more important for humans in the future, preserving diversity and ecosystem function as well as providing areas for recreation and tourism.

**Comment:** For the past 12 years now I have had the opportunity to visit the Beaver Dam Wash area many times for recreational purposes - in fact I live just a few minutes drive from this area. We need to preserve this area, and not allow others to create a noisy, destructive alternative.

**Comment:** Map #3 - Beaver Dam Wash area has serious ATV problems. Destroyed natural resources.

**Comment:** Perhaps the biggest threat to the fragile land and species within Beaver Dam Wash NCA is livestock grazing. The NCA is the heart of the Mojave Desert in Utah and its sparse vegetation and fragile ecosystem simply cannot support livestock grazing. Adding to the challenges facing species in this harsh environment, much of the NCA was catastrophically burned within the last few years. The area can recover with good management, but livestock grazing must be eliminated in order to ensure the survival of some of the above-described species in Utah.

**Comment:** In addition to the removal of domestic livestock grazing in the Beaver Dam Wash NCA, BLM should limit ORV routes in the non-designated road area of the NCA to protect the broad spectrum of wildlife species and sensitive lands in the Beaver Dam Wash NCA. BLM should adopt a “closed unless posted open” policy for the entire planning area to aid in compliance and enforcement. BLM must ensure that each route it designates within the NCA serves the conservation-focused purpose and need of the NCA and minimizes impacts to resources as required by FLPMA and the Executive Orders discussed above. To protect these species and their habitat, BLM should not designate redundant, unnecessary, and ecologically damaging routes within the non-designated road area of the NCA.

**Comment:** In the designated road sections of the NCA, SUWA requests that BLM not designate, or limit to non-public administrative use only, the handful of routes approved by Congress in order to protect the natural resources including wildlife and the fragile habitat for the desert tortoise and the other sensitive species discussed above. Under no circumstances, should BLM designate routes in riparian areas, especially Beaver Dam Wash. Finally, the High Desert ATV trail should not, under any circumstances, pass through the NCA. Such an action would significantly fragment essential habitat for the desert tortoise and other species, possibly endangering the survival of these species, and increase recreation use in areas inappropriate for such use.

**Comment:** The Beaver Dam Wash and Red Cliffs NCAs, as well as lands identified as possessing wilderness characteristics, should be managed as Class I, or at a minimum Class II, areas in order to protect visual resources. The NCAs are congressionally-designated areas “where decisions have been made to preserve a natural landscape,” and thus also must be given one of the most protective visual classifications.

**Comment:** Alternatives for these NCAs should include No Livestock Grazing and No ATV/Dirt Bikes.

**Comment:** There are more vehicle routes than needed in the Red Cliffs NCA and the Beaver Dam Wash NCA. Please close off some of these and ensure that conservation and protection is the priority in the NCA.

**Comment:** f). Beaver Dam Wash NCA CDF recommends that BLM should not develop recreation facilities in the NCA and manage the area to protect the outdoor experience of remoteness. The management plan should limit the number of designated roads for access to protect other natural values in the NCA. The roads must meet BLM's definition of a road (no "primitive roads" or "motorized trails") are allowed because those were prohibited by the Lands Bill. In addition CDF recommends BLM: 1. Analyze the impacts of water development plans by local cities and the Washington County Water Conservancy in the Beaver Dan Wash area upstream from the NCA' 2. Prohibit incompatible uses, recognizing that recovering damaged resources is much more difficult in the desert than preserving healthy ones. 3. Create a healthy functioning ecosystem to protect ecosystem integrity and regional connectivity of wildlife corridors. 4. Grazing permits should be retired in the NCA. BLIr4 should analyze grazing impacts on the fragile desert environment, riparian areas, the uplands and water quality in and above the NCA. Grazing puts the ecosystem at risk and it pushes impacts to the environment over the edge and the land will not come back in this arid desert environment. The boundary of the NCA should be fenced to prevent grazing. 5. Adopt new guidelines for recreation, camping and grazing standards to protect the water

quality in and above the NCA. Restoration of the riparian habitat on BLM land above the NCA and uplands reduces the impacts of floods. 6. Analyze the impact of Gold Strike's cyanide leaching mining on the east fork of Beaver Dam Wash on water quality in NCA. 7. Analyze the current and future direct human impact of outdoor recreation parking lots, 8. Develop thresholds and trigger-points, or limits for closure of roads and trails to protect natural resources in the plan. 9. Determine how 1 OHV use will impact important winter nesting area for waterfowl along the north-south flyways of the Beaver Dam Wash. 10. Include protection to the native desert fishes in the plan, the virgin Spinedace, the speckled Dace and Desert sucker, which have better populations at Lytle Ranch than other streams in the county.

## RED CLIFFS NCA

**Comment:** I am a horse owner in Washington County and I enjoy riding on the available trails in the area. I would like to see the trails in the Beaver Dam Wash and the Red Cliffs National Conservation Areas continue to be available for horse riding. I would like to see more trails set aside for hikers, bikers, and horse riders.

**Comment:** I think there needs to be a northern route around St. George even if it has to go through Red Cliffs NCA. I think you could build tunnels under the highway at various locations for the wildlife to pass through and I have seen this done at other locations within the State of Utah.

**Comment:** Keep all horse areas open in Red Cliff, Red Mountain, Cottonwood Canyon & Leeds Area.

**Comment:** The BLM land behind the OK Corral Subdivision in Washington needs to be closed to motorized vehicles. They are trashing it! The BLM area north of the Red Cliff Reserve behind Leeds is also being trashed by ATV's.

**Comment:** I am concerned about allowing new routes for motorized travel in eastern Washington County. I believe there are ample opportunities for motorized travel currently existing. New routes or areas for motorized travel are not needed. In particular I am very opposed to motorized routes through the Red Cliffs Desert Reserve. This area should continue to be restricted to non-motorized travel only.

**Comment:** All the roads in the NCA are closed? No designation or routes. There are lots of roads and routes that need designated. Redundant routes could be remediated/restored.

**Comment:** As it relates to recreation we would hope to discuss the possibility of partnering with the BLM and Desert Preserve in establishing improved trailheads in the transition area between private property and public lands. We also encourage the BLM to expand non-motorized trails in the Red Cliffs NCA similar to the current White Reef project.

**Comment:** I strongly oppose the paved road - the northern corridor highway - going through the Red Rock preserve for the extension at the Red Rock Parkway to the north of Green Springs. I support the expansion (to 4 lanes if necessary) of the existing Red Rock Parkway. The Preserve needs to be preserved and not cut by another public road access. This is contrary to the basis for preserving this area.

**Comment:** I also ride Warner in Hurricane & the Old Honeymoon trail. Babylon trail - Pine Mtn. - Zion - Gunlock needs a designated trail for horses and some horse camping sites. The ATV should be on certain trails also. I think we need more horse trails in Red Cliffs and an equestrian trailhead at exit 13. More horse trails on east side of Dammeron Valley off the roads leave the roads for others. On the west side of Gooseberry Mesa I would like to see horse trails & camping & a trail head.

**Comment:** I'd like to see horses be given fair consideration as well as biking, hiking, off roading. It would be even better if some education could be done to help everyone be aware of safety and courtesy of others using the trails as well. We ride 4-6 times per week on either the Cottonwood trails, the Leeds area, the Bracken Loop, Red Cliffs area, Red Mtn., Dixie Ntl. Forest, Zion, Gunlock and Washington Fields areas. Would really like to see the roads to Cottonwood Trail be graded and improved. They are heavily used and are very rough; esp. getting horse trailers in and out.

**Comment:** The NCAs should be managed for Conservation values (the "C"! ) rather than recreation. This means that off-highway vehicle (OHV) use should be restricted so that it does not those areas with wilderness character or lands in the NCAs. These restrictions should include outright prohibition in lands with wilderness character and lands included in the Red Rock Wilderness Act.

**Comment:** I am writing to urge the BLM to conduct a wilderness inventory inside areas designated for such protection in America's Red Rock Wilderness Act. Such lands not yet protected by Congress do deserve it. Also, I would like to urge BLM to protect these lands by restricting ORV use in these areas. ORVs have hugely significant impact on wilderness values and wildlife.

Please find ways to close unnecessary and ecologically damaging ORV routes in the Beaver Dam Wash and Red Cliffs Conservation Areas, the routes that extend into the northeast corners of the Canaan Mountain wilderness and the Red Mountain wilderness areas, and also eliminate domestic livestock grazing to protect the unusually large number of sensitive plant and animal species there, including the desert tortoise.

**Comment:** Red Cliffs & Beaver Dam Wash National Conservation Areas

The soils, vegetation, and ground-dwelling wildlife of the Red Cliffs and Beaver Dam Wash NCAs are directly vulnerable to certain kinds of land uses and activities. In particular, I am concerned about roads and motorized use in both NCAs. I encourage the BLM to look, first and foremost, at the values at stake and define management from there. The NCAs have been designated to "showcase BLM's conservation side," and when in doubt of the impacts of motorized uses (and also grazing activities in the Beaver Dam Wash NCA) upon resource protection, species conservation, habitat restoration, sustainable recreation opportunities, and visual resource management -- I urge the BLM to exercise a conservative approach, restricting such potentially destructive activities. As part of this approach, roads should be minimized, with closure of existing redundant and ecologically damaging routes.

**Comment:** Travel and Transportation Management

In order to retain the integrity of the Washington County Lands Bill and the BLM's efforts to manage these valuable public lands, I cannot support a Northern Transportation Corridor that goes through the Red Cliffs NCA. This would severely compromise the Red Cliffs NCA, including the habitat of the threatened desert tortoise, and would undermine the entire conservation effort. I urge the BLM to advocate for the expansion of the Redhills Parkway -- a viable solution for the transportation corridor that balances transportation goals with ecologic, scenic, and outdoor recreation values.

**Comment:** Northern Corridor -- It would be completely inappropriate, and just plain wrong to punch a highway through the beautiful and pristine red rocks of the Red Cliffs NCA in order to save wealthy homeowners in The Ledges a few minutes on their drive to and from Interstate 15. This proposed highway would result in unwanted noise and pollution, the destruction of animal habitat, and the deaths of many animals run down by vehicles in addition to a significant reduction in recreational use and enjoyment. The relatively low speed traffic on Red Hills Parkway already kills dozens of deer and smaller

animals, and it is located on the very edge of the Red Cliffs NCA. Since BLM must suggest a Northern Corridor, please suggest the existing Red Hills Parkway as that corridor.

**Comment:** We also request that the Northern Corridor proposal be completely eliminated from further consideration.

**Comment:** Management of the Red Cliffs National Conservation Area.

Acquisition of Critical Lands Within the NCA. From our perspective, protection and recovery of the Mojave desert tortoise and other sensitive species is of utmost importance in the management of the Red Cliffs National Conservation Area. To accomplish this, it is critical that private and state lands within the boundaries of the NCA are acquired and incorporated into the NCA as allowed by the Act. These lands contain habitat absolutely critical to the viability of the desert tortoise population within the NCA, and the County and its HCP partners committed to acquire these acres as mitigation for the incidental take of desert tortoise authorized by the USFWS. The HCP Implementation Agreement is set to expire in 2016. The acquisition of these lands must be first priority to meet the obligations of the HCP and to assist the county and its partners to negotiate an extension of, or appropriate modifications to the Implementation Agreement.

**Comment:** Improvement of Non-Motorized Trail System with the NCA. The non-motorized recreational opportunities within the Red Cliffs NCA are outstanding and unique. These trails need to be designed and managed to provide for recreational use that is compatible with habitat protection. When the trail system was initially developed during the Public Use Plan planning process, a collaborative team worked diligently to find a reasonable balance between access and habitat protection. This trail system generally has withstood the test of time but for a few areas in need of improvement.

The biggest issue we see is user compliance with the trails system and the increasing issue of off trail travel and unauthorized trail development in the Lowland Zone, causing habitat degradation. Part of the solution is to slightly expand and modify the trail system in key areas, such as Paradise Canyon and the Grapevine/Cottonwood/Red Cliffs area. A few carefully placed, well designed linkages and trails will help create short, moderate, and longer length loops from popular trailheads that satisfy all user groups. Providing these loops will help to improve user compliance with the requirement to stay on designated trails within this Zone.

Other factors that exacerbate the proliferation of off-trail use is the lack of adequate signage, public education/outreach, and law enforcement. These management needs must be addressed and adequately funded. There also needs to be adequate funding resources available for restoration of closed and illegal trails to discourage future use. An increase in trail development in the Upland Zone may indicate the need for a mechanism to approve, develop, and designate additional trails. While off-trail travel is allowed in this Zone for equestrians and hikers, it was never intended that this would enable the proliferation of user-created trails. Trails systems need to be planned and thoughtfully located.

**Comment:** Educational Priorities. Thought needs to be put into a long-term education/outreach plan for the Red Cliffs NCA. While some education/outreach is currently provided by the Washington County HCP Administration, the duration of this service is uncertain as management of the NCA transitions to the BLM and the HCP achieves its implementation goals. It is likely that the County's role will diminish in the future, especially if the current HCP funding mechanism is not made permanent. The goals of education/outreach are important to the long-term success of the NCA.

**Comment:** Maintenance of Fencing, Trail, and Trailhead Infrastructure. The county has been covering the cost of a critical management service—the regular maintenance of boundary fencing (including

tortoise exclusion fencing) absolutely necessary due largely to damage from erosion and vandalism. Without this maintenance, tortoises are able to escape the protected habitat and are at risk of injury or death. Maintaining signs and trailhead infrastructure is important to encouraging responsible recreation use. The County recognized this need and has, (thanks to Justin Neighbor), diligently performed this service even though it was not an identified department position in the HCP Administration. If the County's role diminishes in the future, especially if the current HCP funding mechanism is not made permanent, this position/responsibility needs to be absorbed and continued by NCA Management.

**Comment:** Transportation Planning, Including the Planning and Development of Trail Systems.

A. Identifying Alternatives for a Northern Transportation Corridor. The Virgin River Land Preservation Association recognizes that The Act directs the Secretary, in consultation with federal, state, and local entities, to identify one or more alternatives for a northern transportation route in the county. The inclusion of this provision in the Omnibus Bill is a result of an ongoing debate regarding the Habitat Conservation Plan. It remains imperative for Washington County and its municipalities to develop and implement long-range transportation planning. However, this planning must consider both physical constraints and commitments which create a similar barrier to the construction of roads through critical areas. The HCP is such a commitment. The population of desert tortoise within the boundary of the Red Cliffs NCA has been decreasing over the last several years due to factors such as fire and disease. Tortoise populations are very slow to recover from losses—under the best of conditions a healthy population of tortoises, without added mortality factors, can only grow at a rate of approximately 1% per year. Scientific estimates show a population decline within the Red Cliffs NCA of approximately 40%. Under the best of conditions, it will take at least 40 years to recover the population to previous levels. Yet the increasing prevalence of fire, the associated loss of habitat, and the impacts due to increasing recreation will take their toll. There simply is no room in the equation to locate a new highway through tortoise habitat in the Red Cliffs NCA.

Alternatively, VRLPA suggests that BLM identify alternatives which link the communities along SR18 and Old 91 through Ivins to the Western Corridor transportation route to expedite their access to I-15. The Interstate should be widened through St. George and Washington City to adequately handle local and through traffic. This will satisfy basic transportation needs without impacting habitat, and it will greatly reduce what would otherwise be prohibitively expensive construction and maintenance costs of a Northern Corridor. VRLPA Scoping Comments July 19, 2010

If a Northern Corridor route alternative is offered for evaluation with other alternatives, the only feasible route (albeit also prohibitively expensive and not preferable) would be one that follows the general alignment of the existing Cottonwood-Danish Ranch Road through the Dixie National Forest from Leeds to Diamond Valley.

**Comment:** Public infrastructure. I understand that the anticipated designation of the NCAs in Washington County may preclude the construction of certain public infrastructure which will be important for Washington County residents in future years. For example, local power company interests have intended to construct a high-capacity power transmission line from the St. George power yard in the tortoise reserve area, to bring additional power resources into the area. It's my understanding that placement of such a line would be more cost-effective and would allow the natural impact of such a project to be consolidated, rather than to be spread across the county with multiple transmission lines. It's also my understanding that the local roadway master plan indicates that a "northern parkway" would be established through the tortoise reserve area in order to take pressure off other cross-town routes. I believe that these important infrastructure projects should be permitted, with reasonable efforts to mitigate their environmental impacts, because of their potential value, economic and otherwise, to Washington County residents. These are just two examples, but I believe in general that these public infrastructure needs

should be weighted fairly with conservation and recreational values, and not simply prohibited as the result of an overly restrictive conservation scheme.

**Comment:** Maintain the current RCDR management plan for the NCA and wilderness areas in the RCDR with minor improvements if necessary. The northern corridor highway should not go through the RCDR NCA.

**Comment:** I live in Washington County and am glad to have this natural habitat so close to my home. However, I am concerned with the frequent ATVs driving around, gunshots in signs, and for my safety when I am alone hiking in this area. Why does this area need to be developed further? Shouldn't we have ANY lands that can remain as they are???

Why can't the natural wildlife habitat continue to roam freely in this area? My idea of the BLM is to protect the public lands – not waste them. Why can't there be “primitive zones” in areas to restrict off-road vehicle travel, protect sensitive species, and ensure that these areas retain their wilderness character? I also don't think these lands should be available for grazing cows and more pollution from methane gases. We don't need any more roads in these areas. The ones that already exist should remain primitive. Have you ever been out to Canyon lands or Arches or Death Valley? These are by far the best of the national parks because they have remained “rather” undeveloped (unlike the South Rim of the Grand Canyon and Yosemite Valley). Here in southern Utah, I like so many other people, came to escape the city. Do not ruin these public lands for people like us who use them with no impact.

I support conservation of Beaver Dam Wash and Red Cliffs NCAs to protect the sensitive, plants, animals and other resources in Washington County.

**Comment:** I am writing to ask BLM to protect the lands proposed for wilderness designation in ARROWA but not yet protected by Congress by restricting ORV use in these areas. ORVs have a significant impact on wilderness values and wildlife, and ORV routes fragment wildlife habitat and entire ecosystems. Additionally, I ask BLM to eliminate domestic livestock grazing in the Beaver Dam Wash and Red Cliffs NCAs. Domestic livestock grazing is incompatible with the protection of the ecological values and sensitive species in the Mojave Desert. Grazing threatens the health of the entire ecosystem.

**Comment:** The BLM should protect the lands proposed for wilderness designation in ARROWA but not yet protected by Congress by restricting Off Road Vehicle (ORV) use in these areas. ORVs have a significant impact on wilderness values and wildlife, and ORV routes fragment wildlife habitat and entire ecosystems. Please identify manageable off-road vehicle trailheads to ensure that ORV use does not impact the NCAs, wilderness areas, or other lands proposed for wilderness in ARROWA. In particular, the BLM should close redundant, unnecessary, and ecologically damaging routes within the Beaver Dam Wash and Red Cliffs NCAs in order to protect the multitude of sensitive plant and animal species there, including the desert tortoise. All vehicle routes designated within the NCAs should serve the conservation-focused purpose and need of the NCAs and minimize impacts to resources as required by law.

**Comment:** My main comment is to carry forward the conservation mandate of these NCAs: “The Congressionally-defined purposes of the new NCAs are: to conserve, protect, and enhance for the benefit and enjoyment of present and future generations the ecological, scenic, wildlife, recreational, cultural, historical, natural, educational, and scientific resources of each unit.” Given that there is proposed wilderness (under the America's Red Rocks Wilderness Act proposal) in each of the NCAs, I believe that stewarding the qualities that potentially qualify these areas for wilderness is an important priority.

There are several management approaches that I would like to see the BLM implement to help protect unique, biologically sensitive resources in the NCAs. One is to create backcountry hiking recreation zones in the areas where proposed wilderness overlaps with the NCAs. Another is to limit roads and motorized uses in the NCAs, especially in ecologically sensitive areas and those lands proposed for wilderness designation. And finally, I urge the BLM to dismiss the Northern Transportation Corridor option that passes through the Red Cliffs NCA. This would compromise the entire area, and undermine the conservation effort. Please advocate for the expansion of the Redhills Parkway, instead.

**Comment:** I urge the BLM to close redundant, unnecessary, and ecologically-damaging vehicle routes in the new Beaver Dam Wash and Red Cliffs NCAs. These NCAs include several rare and/or endangered species of flora and fauna—including the desert tortoise—that require protection. I also request that the vehicle routes that are designated within these NCAs serve the conservation-focused purpose and need of the NCAs and minimize impacts to resources as required by law. The BLM should also close, or limit to nonpublic administrative use only, the routes in the Designated Road area of the Beaver Dam Wash NCA in order to protect fragile habitat for the desert tortoise and other sensitive species. I urge the BLM to eliminate livestock grazing altogether within the Beaver Dam Wash and Red Cliffs NCAs. Livestock grazing is simply incompatible with the protection of the ecological values and sensitive species within these NCAs. Livestock grazing of invasive species disturbs the natural ecosystem and native plant and animal species.

**Comment:** Conduct a wilderness inventory of the lands proposed for wilderness designation in America's Red Rock Wilderness Act (ARRWA) that have not yet been protected by Congress. Protect the lands proposed for wilderness designation in ARRWA but not yet protected by Congress by restricting ORV use in these areas. ORVs have a significant impact on wilderness values and wildlife, and ORV routes fragment wildlife habitat and entire ecosystems. Identify manageable off-road vehicle trailheads to ensure that ORV use does not impact the NCAs, wilderness areas, or other lands proposed for wilderness in ARRWA. Close redundant, unnecessary, and ecologically damaging routes within the Beaver Dam Wash and Red Cliffs NCAs in order to protect the multitude of sensitive plant and animal species there, including the desert tortoise.

**Comment:** Eliminate domestic livestock grazing in the Beaver Dam Wash and Red Cliffs NCAs. Domestic livestock grazing is incompatible with the protection of the ecological values and sensitive species in the Mojave Desert. Grazing threatens the health of the entire ecosystem.

**Comment:** On the statutory obligation to identify a northern transportation route, I strongly recommend that the BLM SGFO not propose any route through the Reserve or Red Cliffs NCA because this would be illegal as a violation of the HCP, and because it would also violate the other statutory obligation to protect the Mojave desert tortoise as one of the NCA's specific and basic purposes. Instead, the BLM SGFO should consider either expanding the existing Skyline Drive to accommodate higher traffic volumes, or a new route north and outside of the NCA. If the latter is chosen, it would be at higher elevation in pinyon-juniper habitat, and there are deer herds that migrate through these habitats when there is deep snow at higher elevations. As such, the route may need wildlife crossing under or over passes at some key migration points to reduce potential road kills and dangerous vehicle collisions with deer and perhaps other wildlife species. The DEIS analysis should also evaluate at what point there may be sufficient demand to justify this expansion or new route. Much of the proposed development both to the west (like the Ledges) and east is now on hold due to the economic downturn.

**Comment:** Reject any notion of allowing the "northern corridor highway" to be built through the Red Cliffs NCA. It would be incompatible with the purposes of the NCA. BLM should support local citizens who are pushing for an alternative of expanding the Red Hills Parkway.

**Comment:** I hope the BLM will formulate and implement strong resource management plans for the Red Cliffs and Beaver Dam Wash National Conservation Areas (NCAs) and the Washington County-wide travel plan. As a longtime visitor to Zion and other areas of the Utah Red Rock country, I believe these federally-owned lands merit the strongest possible protection.

**Comment:** I urge you to focus on restricting off-road vehicle use, which has already damaged many areas in the desert Southwest. It is time, I believe, for the BLM to promote conservation, preservation, and non-destructive recreation, particularly in beautiful areas with wilderness values such as the areas to be managed by the BLM in Washington County. Off-road vehicles should be prevented from entering areas proposed for wilderness designation in America's Red Rock Wilderness Act. As you surely know, ORV and their often irresponsible drivers regularly enter ecologically sensitive areas, such as streamside sites, and do irreparable harm there. Keep them out please. This applies particularly to Beaver Dam Wash NCA and Red Cliffs NCA.

**Comment:** I do not support a northern or western corridor through Washington County. These areas need to remain scenic, unspoiled, and beautiful, due to the plant and animal habitats in these areas. I also do not support ATV and OHV development in these areas, or in any other public areas of the county. There are already more than enough roads and trails that these users have access to.

**Comment:** I support integrating the Vision Dixie Principles into your future land management plans. I do not support a highway through the beautiful Red Desert Reserve. As a hiker and biker, I am aware of much ATM and off-road abuse and would like to see more monitoring of this, and to establish areas that preserve a non-motorized experience. I support preserving our scenic areas and protecting our air and water quality.

**Comment:** I am against the building of the North Corridor, to go through the Red Cliffs preserve, this would have a negative impact on our tortoise that live in the Red Cliff preserve, and would destroy the beauty of the red cliffs area, I chose to live here because of the beautiful Red Cliffs and terrain, to have a road would lower the value of any homes that could see this highway, and the city would lose tax dollars, I drive down Highway 18 a lot and hike the area, I suggest either slowing the growth, or expand the Red Hills Parkway. Please do not destroy our beautiful area by cutting through the Red Cliffs.

**Comment:** I'm all for protecting endangered species in areas like the Red Cliffs NCA and the Beaver Dam Wash NCA. I love nature and all its creatures. But closing them off for the protection of a tortoise that no one I know has ever seen doesn't make a lot of sense. Your resources are not enough to be there constantly monitoring the area for people where they shouldn't be. Haven't the people been respecting these creatures without all of this regulation already?

**Comment:** The BLMs credibility with me really suffered when I saw that they were digging trenches 4 or 5 or more in the Desert Habitat Reserve out by the access road into Warner Valley. You saved that area from the off highway crowd and now the state is going to put a 4 lane highway through it. That sure is a fine Desert Habitat Reserve isn't it. But it is a dumping site for people that are too lazy to go to the dump also. You ever go over by the catch basins and see all the garbage that is dumped there. You have the same thing going on over between Bloomington Hills and the freeway where it is being saved from off highway vehicles but it is now being ravaged to build roads and I predict soon more houses and businesses. Another sore spot with me is all the trash that people leave in the desert. They take everything you can imagine to shot it up and leave it for someone else to look at. Clay pigeons are in a lot of places. I actually saw two BLM rangers a few months ago in Warner Valley. I asked about the shooting galleries that are out there and all the clay pigeons and their answer is they are biodegradable. Really, in how many years? Why aren't they patrolling more, people are shooting all over the place and even shot without a

back drop to stop bullets from traveling across the valley at times. They are leaving piles of casing from shotguns and other fire arms every where.

**Comment:** I have had discussions with several individuals-including Residents, Public Officials, Land-owners, and other Public entities, regarding the establishment of a road to connect Leeds and Hurricane through the area where the "Babylon Road" currently runs. I propose plans be made to eventually allow a paved road-with fences down both sides and with limited pullout areas for foot trails.

A well balanced plan to this end would bring several advantages:

1. This would cut down on the disturbances to the natural habitat, by keeping all-terrain vehicles from driving in those areas, as is now the case.
2. This gives people more awareness of the area, its history, and its beauty.
2. This provides a fire line for protection against future wildland fires.
3. This cuts down dust in the area.
4. It reduces need for policing of the area as it would be better controlled by fencing and designated trails.
3. It allows Greater transportation options for Residents of Washington County to cut down on congestion.
4. It provides economic benefit and opportunity to the Town of Leeds and, I believe, the City of Hurricane.

Thank you again for your efforts and work on behalf of the Citizens of our Community. In short, putting focus on a balanced solution will bring more benefit to all involved. I look forward to working with you and other entities to find solutions. I am calling a meeting of Public Officials, Land-owners, Developers, and Residents to discuss the needs and desires for this area. Please let me know if you would like to attend that meeting as well.

**Comment:** Recreation. We encourage the BLM and the Red Cliffs Desert Reserve to preserve existing recreational amenities currently located within the Red Cliffs NCA and to develop additional recreational amenities including non-motorized trails, trailheads, and primitive camping sites. The current development of the White Reef trail system with an improved trailhead in the Red Cliffs National Recreation Area is a good model to follow for the Red Cliffs NCA. We would welcome the opportunity of partnering with the BLM to establish improved trailheads on the edge of our development providing access to an expanded trail system within the Red Cliffs NCA.

**Comment:** 1. Access for off road should be allowed for existing off roadways. This off road access should be limited to prevent damage to drainage areas, plant and animal life as well as noise kept to a minimum. 2. Dumping of trash and littering should be eliminated as much as possible. When I ride horseback even in the Desert Reserve I am always surprised how much trash I pick up and carry out in my saddlebag. 3. On Red Mountain trail I have carried out lots of trash as well. 4. The areas on BLM east and south of Washington have areas of dumping of building materials from local construction sites as well as local trash. 5. I have enjoyed horseback riding on many of the public lands in our surrounding areas including: Gooseberry Mesa, the Desert Reserve, Pine Valley Mountain, Gunlock area by the dam, Blackrock, Arizona Strip, Honeymoon Trail area and others. 6. I hope to see the Red Cliffs Parkway to be the major access to the Northern Corridor. I'm not sure this will happen considering the overpass being

constructed just below Winchester Hills. I'm sure some "big money" has been involved in that area. 7. The relationship of offroad or ATV people with the hikers, mountain bikers and horseback riders are compatible, but the impacts of ATV's on the land are very negative. I really like to see selected areas for ATV use that isolate the "wild uncontrolled" riders from the rest of us. I used to enjoy riding the sand hills just south of Sand Hollow Reservoir, but no longer. The ATV's there are just crazy. I realize ATV people have a lot of money behind them as well. I just hate to see areas become exclusive. I feel public lands should be accessible to all. 8. I have seen the plan for Red Mountain Trailhead and feel we should have planned for some horse camping, but the years of collaborative planning we (Backcountry Horsemen) put into that trailhead has been completely ignored with no explanation. This is unacceptable and I feel we deserve an explanation as to why our continued input has been complete and so rudely ignored.

**Comment:** The state has concerns about the intent and extent of the analysis of issues mentioned in the NOI. For example, the BLM cannot substantively analyze air quality in Washington County without aligning with the state's regulatory permitting process. In addition, the state requests the BLM analyze not only the need for new Areas of Critical Environmental Concern (ACEC) as required, but also analyzes existing ACECs for continued need. The state requests the BLM consider, in light of the terms and intent of the Omnibus Public Land Management Act of 2009 (P.L. 111-11), whether the interim management policy for wilderness is still necessary in Washington County, and whether wild and scenic river study segments identified under previous studies remain covered by the study provisions of the BLM Manual. The state also requests that the BLM consider the provisions of R.S. 2477 in the analysis of OHV travel plans, in light of information provided by the state or Washington County, or recorded in the Washington County Recorder's Office. Finally, the state requests the BLM work in very close coordination with it and Washington County in the analysis of the proposed northern transportation corridor, in light of the need of species within the Red Cliffs Desert Reserve.

**Comment:** The 1999 St. George Field Office RMP identified the possible development of a cooperative management agreement allowing Snow Canyon State Park (SCSP) officials to exercise day-to-day management of access and recreation on public lands immediately to the north and west of SCSP and in Paradise Canyon to the southeast, lands that now include parts of the Red Cliffs NCA. While a formal agreement has not yet been developed, SCSP, under the auspices of the BLM, did undertake day-to-day management relative to law enforcement, visitor services, recreation management, and resource protection on adjoining lands immediately east of Red Mountain. As on-going partners with the BLM within the Red Cliffs Desert Reserve (RCDR), the Utah Division of Parks and Recreation would appreciate the following items being taken into consideration during the current planning process: 1. Maintain annual seasonal closures (relative to technical rock climbing) on select routes west of West Canyon Road. These closures are designed to protect nesting raptors, including peregrine falcons, and have been implemented annually since 2000 in conjunction with local climbers and the Access Fund. Affected routes are closed from February 1 through June 1. Further route and closure information can be supplied by the Division of Parks and Recreation upon request. 2. Continue agency coordination in regards to recreation access from SCSP on to the Red Mountain Wilderness Area. While wilderness designation allows for primitive and unconfined recreation, including use by pets, SCSP law is more restrictive. Specifically, park law mandates that (a) hiking is on designated trails only (R651-633-2.8a) and (b) dogs are prohibited from all trails and natural areas unless posted open (R651-633-2.8f). Future access points to and from the Red Mountain Wilderness Area should be coordinated to ensure that recreation use is consistent with Utah State Park rules. 3. Assess the development of a new hiking only trail on the east boundary of SCSP. Currently, area recreationists access a route on the eastern boundary of the park commonly referred to as Jones Bones (a.k.a. Valentine Peak). While the majority of this route is on State Park and private property (outside of the Red Cliffs NCA boundaries), the standard approach is across BLM property located within the NCA. Working cooperatively with the BLM and private land

owners, the Utah Division of Parks and Recreation would like to mark and designate an official trail in this area.

**Comment:** Red Cliffs NCA should not have a north-south route along the old Turkey Farm road (part of Cottonwood road). It would split the NCA and be very bad for the wildlife.

**Comment:** I would hope that you do not select any routes for the Northern Transportation Corridor through the Red Cliffs NCA or the Desert Tortoise Preserve.

**Comment:** The Red Cliffs Desert Reserve (RCDR) was set aside as mitigation to offset development of 12,264 acres of tortoise habitat and take of 1,169 desert tortoises. The main goal of the RCDR is to maintain a viable population of tortoises. The Washington County Habitat Conservation Plan specifically states that, within the RCDR, uses will be carefully controlled and all management actions will place the desert tortoise as the highest priority. The Division of Wildlife Resources encourages the BLM to continue to place the protection of the desert tortoise and its habitat as the highest priority throughout this planning process. To accomplish this goal, the Division of Wildlife Resources suggests the following actions:

1. Continue to limit recreation use to designated trails within the lowland zone in order to minimize degradation and loss of tortoise habitat.
2. Continue the enforcement of recreation restrictions that protect the RCDR.
3. Continue to limit OHV travel to designated roads within the National Conservation Areas.
4. Encourage grazing practices that prevent further tortoise habitat degradation with the NCAs. The Division of Wildlife Resources notes that the tortoises have lost a substantial portion of their habitat due to recent wildfires and dominance of invasive species within the areas.

**Comment:** In the Red Cliffs NCA RMP BLM should identify manageable off-road vehicle trailheads to ensure that ORV use does not impact the habitat, scenic, natural, wilderness, and other values for which the area was designated. All vehicle routes within the NCA must serve the conservation-focused purpose and need of the NCA and minimize impacts to resources as required by FLPMA, Executive Orders, and BLM's own regulations. Similarly, BLM should not designate redundant, unnecessary, and ecologically damaging routes within the Red Cliffs NCA in order to protect the multitude of plant and animal species, their habitat, scenic resources, and other values in the area. In addition, construction of a northern corridor or High Desert ATV Trail through the Red Cliffs NCA would violate the purposes for which the NCA was designated. The High Desert ATV Trail must not be designated through the Red Cliffs NCA. It would fragment essential desert tortoise and other species habitat, invite increased recreational use to the area, and threaten the survival of several of the species that inhabit the area. It is also critically important that no ORV trails are designated in riparian areas.

**Comment:** In addition, BLM should consider working with state and private landowners to add protective management prescriptions to a small area adjacent to the Red Cliffs NCA. See Map attached as Exhibit B. Although this area is owned by state and private landowners, it is important habitat for desert tortoise and likely other species. If there is anything BLM could do to acquire these lands or work with other landowners to protect the area, it would offer valuable additional protection adjacent to the Red Cliffs NCA.

**Comment:** The Beaver Dam Wash and Red Cliffs NCAs, as well as lands identified as possessing with wilderness characteristics, should be managed as Class I, or at a minimum Class II, areas in order to

protect visual resources. The NCAs are congressionally-designated areas “where decisions have been made to preserve a natural landscape,” and thus also must be given one of the most protective visual classifications.

**Comment:** Congress directed that Beaver Dam Wash and Red Cliffs NCAs be managed with an emphasis on resource protection and conservation. In the NCAs, the ecological, scenic, wildlife, recreational, cultural, historical, natural, educational, and scientific values are paramount. If livestock grazing imperils the resources for which these NCAs were designated, BLM must eliminate and/or greatly reduce livestock grazing on these lands.

**Comment:** Alternatives for these NCAs should include No Livestock Grazing and No ATV/Dirt Bikes.

**Comment:** No northern corridor route should even be considered for the Desert Reserve. Much of its appeal is the quiet plus motorized vehicles would bring litter.

**Comment:** There are more vehicle routes than needed in the Red Cliffs NCA and the Beaver Dam Wash NCA. Please close off some of these and ensure that conservation and protection is the priority in the NCA.

**Comment:** This letter is in regard to the proposed changes to Red Cliffs Desert Preserve. I encourage you to analyze all of the impact and find ways to preserve our community's character and interests. Roads should be limited to minimize their impact on the National Conservation Areas. Roads should be limited to minimize their impact on the National Conservation Areas. The northern corridor highway should not go through the Red Cliffs National Conservation Area; instead, the Red Hills Parkway should be expanded. The travel network should be marked OPEN to help establish a better road system. Please, consider a planning framework of "Limits of Acceptable Change" to monitor impact of roads and trails on the environment. Implement a photo monitoring program and triggers for closure. Use zones in the BLM district for better long-term management of outdoor recreation for different priorities and experiences. Identify locations of special areas or uses on BLM land that need to be protected and managed differently than they are now' Start by identifying new or expanded Areas of Critical Environment Concern where biological conservation is a priority; and for scenic landscape, Virgin River, and watershed protection. Please, I urge you to develop new Special Recreation Management Areas for quiet, traditional uses such as horseback riding, hiking, biking, wildlife viewing, and backpacking.

**Comment:** I was the administrator of the Red Cliffs Desert Reserve for 14 years before it attained NCA status. I was threatened, became the target of misinformation and then removed from my position because I refused to abide by the Washington County Commission's directive to support the Northern Corridor through the reserve and because I refused to hide monies including \$10,000 which the commission secretly removed from the Habitat Conservation Plan (HCP) account without the required public process. Two hundred thousand dollars of HCP sensitive species money which was approved to be given to the Utah Department of Natural Resources (UDNR) to build a building (counter to HCP contractual language that stipulated direct benefits to sensitive species) was secretly routed per the direction of UDNR and the commission to the Water District without public approval. I was critical of these actions and others, have no regrets and moved to greener pastures. The reserve evolved from a balanced and reasonably fair initiative (with some excellent partners who should be praised and who accomplished notable goals), to a gutter of inside deal making, conflicts of interest and money laundering.

This has direct bearing on the Northern Corridor because even now back room deals are likely underway to benefit friends and associates of elected officials at the expense of the NCA, state and federal taxpayers, recreationalists and others who worked hard to develop the NCA for the benefit of future generations. Further, it is likely in my view that the public will be provided misinformation about the

impacts of a freeway and the dire straits tortoises are in now. Building a freeway through the NCA, when over \$50,000,000 of tax monies have been spent to protect it is criminal; this does not include significant monies spent to acquire grazing rights inside the reserve with the intent of further protecting tortoises. The lands purchased inside the NCA with federal funds were purchased to protect them, not to support highway infrastructure. Some such lands were transferred to UDNR with protective language which is now being ignored.

I was intimately involved in the final negotiations from 1994 to 1996 regarding the HCP and specifically what new roads would be allowed within the reserve (now NCA) as well as later discussions over many years. I am extremely familiar with tortoise densities in the reserve and the impacts facing them. It was recognized then and remains even more so now, that any freeway through the NCA including the proposed Northern Corridor Routes would be catastrophic to the recovery of the Mojave Desert tortoise not to mention open space and recreational opportunities. No such freeway was allowed. Period.

Droughts.

Fires which burned thousands of acres of tortoise habitat and tortoises and utility impacts have forced tortoise populations to such low levels that this species should be up-listed to endangered by the USFWS and Utah Division of Wildlife Resources (UDNR); indeed I am actively working to this end. Both agencies have reports (including extensive tortoise surveys conducted by UDNR) documenting such declines as well as reports from Dr. Pam Foti at Northern Arizona University (conducted over a number of years) highlighting other dire repercussions to the NCA via human impacts. Yet, for political reasons and insider self dealing, these irrefutable documents have been ignored in an attempt to hide the obvious - tortoises in the NCA are being pushed to levels where self sustaining populations probably do not and/or cannot exist; and these are fragmented and contain diseased animals. This in addition to the likelihood of more disastrous fires whose effects cannot be reversed.

Further, there is no tortoise habitat left with connectivity to the NCA which would qualify as mitigation. Also, nearly all of the tortoise habitats adjacent to the NCA have had tortoises removed because they were designated as 'take areas" over the HCP permit. Destroyed tortoise habitat must be replaced (mitigated) at appropriate ratios (within the zone of impact) up to five times the impact (e.g. 1 acre of tortoise habitat destroyed must be replaced with 1-5 acres of new tortoise habitat depending on the quality of tortoise habitat destroyed). In summary, not only would such a freeway be catastrophic, there is no way to mitigate it per federal regulatory mandates. The same can be said for a proposed highway and water line down "Babylon Road" in zone 4 of the reserve where I lead efforts to translocate tortoises to establish a new population, however marginal. This highway has been politically pushed in the past. To the best of my knowledge there has been no summation of the cumulative impacts of utilities to tortoises since the reserve (now NCA) began. Habitat has been lost and occasional tortoises killed where under the federal HCP permit no take of tortoises was allowed. Therefore any review process, must examine and quantify the total sum of impacts to date as well as those of any proposed freeway, alone with all other future impacts. Tortoises and their habitat have been whittled down and fragmented over the years because no such summation of impacts has occurred - it was always brushed under the rug

Most parties do not understand why the Northern Corridor is being politically pushed when in fact most of the county growth is heading south and east, and when alternatives exist that will not bisect the reserve. This corridor is politically supported because county commissioners and other elected officials including St. George City, want it to benefit friends in the development business. It's about feeding inside/s wallets over the public interest and what's best for future generations when premium open space is rapidly becoming non-existent and species such as the tortoise are facing die-offs. Most people also do not realize that UDNR (Mr. Richard Fridell) specifically suggested the route through the middle of the reserve from Washington City, over Broken Mesa to Winchester Hills in a closed door meeting with the Water District

and County Commission when he knew it was in clear violation of the HCP permit and would in fact have huge impacts to tortoise populations. This meeting was secretly held before any proposal came to the HCP advisory committee (HCAC) and the proposal is cited in the official minutes of these meetings.

Most also knew that Commissioner Garder's family would benefit from such a highway coming into Winchester Hills and that a highway interchange was already under construction at Winchester Hills; yet when I was there, he never recused himself and instead lobbied for the freeway across all fronts, including county funded trips to Washington D. C. In other words, the state agency (UDNR, a signatory to the HCP along with the county) and county commission that taxpayers hired to enforce regulations have in fact worked behind the scenes to obtain permission for a freeway through the reserve, knowing full well that it will have devastating effects and that tax money (millions passed to UDNR) was used to purchase private properties to protect them from exactly these kinds of human impacts. Additionally, a freeway designation through the reserve will have the intended impact of inflating State Land (SITLA property) values inside the NCA to initiate massive BLM trades elsewhere in the state to the detriment of taxpayers.

The reserve and NCA were established as mitigation for the take of tortoise habitat and tortoises outside the reserve with the clear intent that it be permanently protected. Now after nearly all the tortoise habitat has been developed, self-serving elected officials and their puppets want to get what was specifically not permitted under the HCP - a freeway through the NCA which will destroy it and cannot be mitigated.

**Comment:** BLM should evaluate the current and anticipate impacts on the NCA from outdoor recreation for the life of the plan and take the necessary action to protect the NCA in the management plan. CDF also recommends the following be included in the plan:

1. BLM take specific steps to protect NCA in the language of the management plans with new standards, focus and prioritization.
2. Create a healthy functioning ecosystem to protect ecosystem integrity and regional connectivity of wildlife corridors.
3. Aggressively suppress wildfires
4. Favor native species in reseeded efforts
5. Prohibit incompatible uses, recognizing that recovering damaged resources is much more difficult in the desert than preserving healthy ones
6. Off-trail human impacts have increased in the NCA and BLM should take a fresh look at how the trails were designed, the current trail design was not done by professional trail planner and is leading to more off trail impacts and BLM should redesign them to protect habitat in the NCA
7. BLM should reevaluate the concept of multi-use trails and consider trails in certain areas for hiking and horses to protect habitat.
8. With the increase in human impacts to the NCA BLM must consider the carry capacity of outdoor-recreation in the NCA. The concept of carrying capacity as it relates to recreation setting is important to consider as part of this planning process, The conceptual framework behind land-based zoning prompts an inventory to determine the overall planned experience.

9. New policies need to be developed for utility easements, water development and scenic values. Protocols need to be reviewed and tightened to protect the natural resources. In the past too much leeway has been given to utility companies.
10. What are the current and future direct human impacts of outdoor recreation, parking lots, camping and non-native species introduction and how they can be managed to protect natural resources?
11. Develop a matrix of thresholds, trigger-points, and limits so administrative action can be taken to close an area or trail to preserve the natural resources of the NCA. The current Public Use Plan lacks the ability to close a trail and restore areas that are impacted.
12. Include restoration costs in the budget
13. Guidelines should be developed to protect the Navajo Sandstone aquifer as an important community water supply.
14. The last grazing permit should be purchased and retired
15. Include the cottonwood population of the endangered Shivwits Milk-vetch.
16. The Water District plans to release water from Sand Hollow (Pump Back Project) which may contain mussels into the Virgin River in this reach within the NCA. How will mussels impact the endangered and native fish?
17. Address the impact of a proposed sewer treatment plants above zone 4 and any discharge into the river.

**Comment:** The Northern Corridor Highway

Local officials continue to pursue a new major highway through the Red Cliffs NCA. When increased traffic demand occurs, the Red Hills Parkway could be expanded and the NCA should be protected from a highway bisecting the Red Cliffs NCA. There is no need for a major highway to go through the NCA in the future to service such small parcels of private land along highway 18. Further, a northern corridor through the NCA was already considered in a NEPA process and eliminated from consideration. "According to a letter from USFWS, such a road would compromise the commitments on which the Washington County HCP was based. ... and may result in an adverse modification of designated critical habitat."

## **CULTURAL/PALEONTOLOGY**

**Comment:** Map 1 6/14/10. See A07. ACEC or SRMA for area 12 miles down Motoqua Rd. Protect Archaic Cave and Slot Canyon for archaeological resources. Sensitive historic sites. Sug. Restricted area - feet only - no motorized vehicles or bikes.

**Comment:** Resource Identification and Preservation - The Cottonwood Canal which was one of St. George's earliest water sources runs through the Red Cliffs Conservation Area. USGS maps still refer to Aqueduct in a few locations. What can be done to document via photos and preserve any remnants including canals, ditches, tunnels, water control features, headgates(?), reservoirs relating to this historically significant artifact (dating from 1890's to 1910's). Ranches, outbuildings, stock canals, in general BLM and including original homesteads of pioneer ranches. Older USGS maps show some of these locations.

**Comment:** The Mail Drop - Shunes Hollow - historic spot. I have been going to this spot and Caanan Mountain since the mid '60s & '70s. The history of this spot was not followed up before the wilderness crusade was passed. This is an unfortunate boundary that now limits only healthy adults & children to walk this far, 1.8 mile + in soft sand. We volunteered to install 2" steel posts in ground 3" drilled holes in the sandstone at the base of the wash. These posts would have welded steel rails between the posts - 2 rows & painted. This would allow handicapped & very young people plus hundreds of others to visit this touching historic spot. Please open it up & we will do the work. Refer to mail drop history by Dale B\_\_\_.

**Comment:** BLM should conduct cultural resource surveys on the all the lands in the planning area, where they haven't already been completed. Areas where motorized use (both passenger vehicle and OHV) is anticipated should have extra care given to their cultural resource surveys, since it well-known that vehicle access makes the destruction of and damage to cultural resources much easier.

**Comment:** Conduct cultural resource surveys on all potential off-road vehicle routes.

**Comment:** With all of the archeological sites in the area, I urge the BLM to conduct cultural resource surveys on all potential off-road vehicle routes on public lands in Washington County. Motor vehicle access ultimately results in increased vandalism and looting of cultural resources.

**Comment:** For any areas that the BLM designates for ORV use, the BLM should first conduct a cultural resource survey to find and protect priceless cultural resources in Washington County. ORV access increases the likelihood of vandalism, grave-robbing, and looting of cultural resources. Recent federal prosecutions in San Juan County in Utah show that the widespread use of ORVs increased the rate at which the suspects were able to steal the cultural resources involved in the case.

**Comment:** At the top of our concerns are runaway off-road vehicle use that have, at times destroyed delicate features/soils and prehistoric rock art. You must get a handle on this overarching problem by only allowing appropriate and manageable off-road vehicle use that doesn't harm wildlife habitat, prehistoric sites and delicate soils/plants.

**Comment:** There are public lands of wilderness character not included in the recent legislation concerning Washington County's 180,000 acres. You should do a cultural survey, design backcountry hiking areas, primitive recreation zones, do a wilderness inventory of proposed lands of ARROWA not yet protected (and restrict ORV use in the areas).

**Comment:** Please do not conduct cultural resource surveys on all potential off-road vehicle routes on public lands in Washington County. Motor vehicle access does not increase vandalism and looting of cultural resources.

**Comment:** 1) We believe that more kiosks should be constructed and the graphics should offer more in the way of interpretation. These should be placed at areas having existing BLM signage and more importantly at areas having no BLM signage.

2) We believe that many areas require at least limited fencing to discourage damage by off road vehicles, bikers or horses. This is especially needed on Little Creek Mesa.

3) We believe that there should be some effort at least limited reconstruction of some of the larger pit house villages on Little Creek Mesa to give the public a little better appreciation of the scale and magnitude of these developments. This is not appreciated because at present they are at best a pile of rubble (stones) and at worse merely a raised grassy area. One may argue that this would promote pot hunting and further destruction, but we believe that this would in fact deter this behavior because people

would know that someone is watching and caring for these areas. This could also be done on Anasazi Ridge.

4) We believe that the signage on Anasazi Ridge and Santa Clara Canyon should be significantly expanded to include a history of the site, its expanse and importance to the Anasazi. Anasazi Ridge along with Santa Clara Canyon makes up one of the key archaeological complexes in Southern Utah, yet people only know that it is the location of some “neat petroglyphs”. However, they have no idea of the significance of the glyphs and the expanse of the “city” that surrounded the glyphs. A little more work could turn this into a really great historical resource for Washington County and the state of Utah.

**Comment:** However we are opposed to some BLM actions taken in the Gold Butte area. The major one was to move the vehicle traffic locations far away from the Kirk’s Grotto and Kohta Circus areas. The new trail head locations make is a difficult hike to view these sites, especially for seniors, even those in good physical condition.

We believe that archaeological sites should be open to the public, but not necessarily have their locations publicized.

**Comment:** We support the efforts of the Concerned Citizens for Dixie in their efforts to coordinate the interests for hikers, bikers, off-roaders, horsemen and archaeology enthusiasts into a compressive plan.

**Comment:** We especially support their highlighting of Little Creek Mesa as an area that needs immediate attention, considering the number of bikers and campers using the area and the large number and location (on flat rock) of rock art and other large ruins in close proximity to camping areas and bike trails. Here, planning of trails, with limited use of fencing and extensive use of kiosks would be helpful in protecting the archaeological treasures of the area.

Similarly, additional work can and should be done on Anasazi Ridge and Santa Clara Canyon as well as on Gunlock Road, where there is no signage or other protection.

**Comment:** The Utah Rock Art Research Association (URARA) welcomes the opportunity to comment on the public scoping for the travel plan and planning process. We are concerned about the Jackson-Red Sands pictographs and petroglyphs, and the Little Creek Mesa petroglyphs. Although Jackson-Red Sands contains an area of critical environment concern, the network of roads and motorized pathways precludes any effective management to preserve the unique rock art of the area. Uncontrolled dispersed camping, littering, vandalism are all consequences of the ease of access to the area. We recommend closure of all but essential roads to traffic in order to protect rock art and a unique geological environment in the Jackson-Red Sands area. We recommend that the ACEC be expanded from Lone Pine Arch from the west to the Motoqua Road on the south and east towards Gunlock Reservoir, and north to Square Top mountain. Unless the management plan takes specific steps to protect this area, more vandalism to rock art will occur such as building campfires in the birthing cave,. No road should be permitted within 1/4 mile of a rock art site or more. The Little Creek Mesa petroglyphs are being damaged by dispersed camping where petroglyphs have been used as fire rings, petroglyphs have been walked over, driven over, and structures damaged or destroyed. There is a sanctioned bicycle trail adjacent to a 12 foot serpent. We request that the Little Creek Mesa cultural resources by preserved by eliminating non-essential roads, and dispersed camping not being allowed near trails. Rock art requires reverence. It is sacred, and it must be protected. Thank you for this opportunity to comment in the public scoping process. I look forward to working with BLM on the development of the travel plan and the protection of rock art in the St, George District.

**Comment:** TRANSPORTATION PLANNING

#### A. BLM Must Comply with Section 106 of the NHPA for the Comprehensive Travel Management Plan.

The Washington County bill requires BLM to develop a “comprehensive travel management plan” (Travel Plan) for BLM lands in the county. As part of this plan, BLM must “designate a system of areas, roads, and trails for motorized use.” This action in turn requires compliance with Section 106 of the NHPA, 16 U.S.C. § 470f, because, as BLM has recognized, motorized use has the potential to cause direct and indirect effects on historic properties. See IM 2007-030 (recognizing potential effects on cultural resources from OHV route designations and use).

Section 106 and its implementing regulations impose a number of discrete requirements on BLM regarding preparation of the Travel Plan. First, BLM must initiate the Section 106 process by establishing the scope of the “undertaking.” 36 C.F.R. § 800.3(a). In doing so, we urge BLM to reject the approach encouraged by IM 2007-030—and followed by several other Utah field offices during recent planning efforts—that largely exempts “existing” OHV routes from the Section 106 process. We believe that this approach is inconsistent with the Section 106 regulations, which does not permit the use of such an exemption under these circumstances, and therefore violates the NHPA. See 16 U.S.C. § 470h-2(a)(2)(E)(i) (requiring consistency between an agency’s procedures and the Section 106 regulations). Moreover, the Advisory Council on Historic Preservation (ACHP)—the federal agency with expertise in historic preservation—has expressed concern for the ambiguities in IM 2007-030, in particular the direction concerning the designation of “existing” routes. Letter from Reid Nelson, Assistant Director, ACHP, to Kate Winthrop, Acting Preservation Office, BLM 1 (Aug. 30, 2006); see also Letter from Don L. Klima, ACHP, to Linda Hansen, California Desert District Manager, BLM 1–2 (May 27, 2003) [hereinafter “Klima Letter”] (identifying need to comply with Section 106 when deciding whether to designate a route as “open or closed”)

Second, BLM must initiate consultation with the Utah State Historic Preservation Office (SHPO) and identify other “consulting parties” to be formally involved in the consultation process, including Indian tribes. 36 C.F.R. § 800.3. To the extent that BLM has not already contacted the Utah SHPO about the travel plan, we recommend that BLM do so as early possible, and at least while alternatives are still being developed for the draft environmental impact statement.

Third, BLM must make a “reasonable and good faith” effort to identify historic properties. Once again, we strongly recommend that BLM not follow the approach outlined in IM 2007-030, which indicates that Class III inventories are normally not necessary when BLM designates an “existing” route for OHV use. Instead, after consulting with the Utah SHPO and other consulting parties, we recommend that BLM develop a comprehensive strategy for completing cultural resources inventories of proposed OHV routes. In the past, ACHP has advised BLM that such a strategy “need not necessarily include an intensive archaeological inventory of all routes, but it should be sufficient to demonstrate a reasonable and good faith effort to identify historic properties.” Klima Letter at 2. We concur with this practical recommendation, which suggests that Class III inventories of “existing” routes must in some and, perhaps, many cases take place, and encourage BLM to prioritize inventories in areas with documented cultural significance, including ACECs with “relevant and important” historic and cultural values like Little Creek, sacred sites identified under Executive Order No. 13007, areas known or likely to contain high site densities and areas where conflicts between OHV use and cultural resources are known or are likely exist. We further recommend that BLM defer designating routes in areas with documented cultural significance until such time as it can complete cultural resources inventories of those routes. BLM recently adopted such an approach in the Record of Decision (ROD) for the Grand Canyon-Parashant National Monument Resource Management Plan, deferring route designations in ten areas with a “high-potential” for cultural resources pending completion of cultural resources inventories. BLM, Grand Canyon-Parashant National Monument ROD 9 (Feb. 2008).

Fourth, BLM must evaluate whether the effects of designating routes for motorized use will be “adverse.” In conducting this evaluation, BLM must recognize the potential for route designations to indirectly, as well as directly, impact cultural resources. See 36 C.F.R. § 800.5(a)(1). Professional archaeologists, as well as BLM, are increasingly finding that sites closer to travel routes are more susceptible to the indirect effects of OHV use, including vandalism and looting. See, e.g., Jerry Spangler, *Chasing Ghosts: An Analysis of Vandalism and Site Degradation in Range Creek Canyon, Utah* 22 (2006) (documenting high rates of vandalism at sites located within 200 meters of a road); Peter W. Bungart & Anne Raney, *Faint Traces in Fragile Places: Cultural Resources Survey Along Selected Roads & Routes In The Sonoran Desert National Monument* 95 (2009) (noting that the “overwhelming consensus among the archaeological profession, land managers, and concerned citizens is that the closer a site is to a motorized vehicle route, the greater the risk from vandalism or inadvertent disturbances.”); Letter from Michael Stiewig, Price Field Office, BLM, to Lori Hunsaker, Deputy Utah SHPO 1 (July 7, 2009) [hereinafter “Stiewig Letter”] (“Indirect and cumulative [adverse] impacts [to cultural resources on the West Tavaputs Plateau] could potentially result from the . . . opening or improvement of various travel routes, including vandalism.”). Additionally, BLM has recently recognized that “increases in traffic on . . . roads” can cause other kinds of indirect adverse effects by altering the “setting, feeling, and association” of cultural resources. Stiewig Letter at 1. Consequently, BLM must “take into account” the potential for route designations to cause vandalism, looting, alterations to the setting, feeling or association of cultural resources and other potential indirect adverse effects.

Finally, BLM must develop measures to “avoid, minimize or mitigate” any adverse effects resulting from the Travel Plan. In cases such as this one where it is unlikely that adverse effects on cultural resources will be fully determined before the undertaking is approved, the Section 106 regulations allow BLM to develop a “programmatic agreement” (PA). 36 C.F.R. § 800.14(b)(1)(ii). This PA would then be developed in consultation with the Utah SHPO and other consulting parties and would list the specific actions that BLM would take in order to identify cultural resources, to the extent BLM had not done so already, and then avoid, minimize or mitigate adverse effects, including closing routes or otherwise limiting/controlling motorized travel within areas of documented cultural significance.

**Comment:** BLM Must Apply the Minimization Criteria of 43 C.F.R. § 8342.1. During the development of the Travel Plan, BLM must ensure that it applies the minimization criteria of 43 C.F.R. § 8342.1. Under this regulation, BLM must “locate” OHV areas and trails so as to “minimize damage to soil, watershed, vegetation, air or other resources [e.g., historic and cultural] of the public lands. . . .” 43 C.F.R. § 8342.1. As a federal district court in California recently found, compliance with this regulation is mandatory during the development of travel plans. *Ctr. for Biological Diversity v. U.S. BLM*, 2009 U.S. Dist. LEXIS 90016, at \*58 (N.D. Cal. Sept. 28, 2009). Thus, BLM must incorporate the minimization criteria into whatever analytical framework it develops for the travel planning process and then locate OHV areas and trails in a way that “minimizes” damage to historic and cultural resources.

#### **Comment:** CULTURAL RESOURCES MANAGEMENT

Sections 110 of the NHPA and section 14 of the ARPA contain analogous planning and stewardship responsibilities. Under Section 110 of the NHPA, BLM must “assume responsibility for the preservation of historic properties” located on its lands, 16 U.S.C. § 470h-2(a)(1), and develop a program “for the identification, evaluation, and nomination to the National Register of Historic Places, and protection of historic properties.” *Id.* § 470h- 2(a)(2). Section 110 further requires that BLM manage and maintain historic properties “in a way that considers the preservation of their historic, archaeological, and cultural values. . . .” *Id.* § 470h-2(2)(B).

For its part, section 14 of ARPA requires BLM to develop both a plan and schedule for “surveying lands that are likely to contain the most scientifically valuable archaeological resources. . . .” 16 U.S.C. §

470mm. Taken together, these requirements impose upon BLM an obligation to plan comprehensively for the identification and protection of cultural resources under its care.

We encourage BLM to take this obligation seriously during the current planning process. The St. George Field Office contains a wealth of cultural resources, ranging from the numerous prehistoric sites along the Virgin River and in Little Creek, to the historic structures in the Mormon agricultural settlement of Harrisburg. The area is just as much a historic crossroads, a place to witness and appreciate evidence from centuries of occupation, as it is an ecological crossroads. Thus, as required by Section 110 of the NHPA and section 14 ARPA, BLM must develop a comprehensive plan for the identification and protection of cultural resources within the planning area.

**Comment:** Cultural resource surveys should be conducted on all potential or proposed off-road vehicle routes to determine whether vehicle access and uses may jeopardize any important cultural resources. It is well documented that motor vehicle access can increase vandalism and looting of cultural resources.

**Comment:** The Grafton Heritage Partnership Project (GHPP) has a cooperative management agreement with the Bureau of Land Management (September 8, 2003) on a collaborative effort between the GHPP and BLM for the management of the Grafton cemetery in order to protect and preserve this important public heritage site. The cooperative agreement, drafted by the BLM, recognizes previous unsupervised use of the area surrounding the cemetery has resulted in “significant degradation of this historic site due to neglect and vandalism as well as conflicts between incompatible uses such as off road vehicle use and camping in the dry wash next to the cemetery”. The agreement goes on to state the BLM and GHPP will seek to “Ensure that the natural features of the area are protected from adverse impacts of recreation use, such as off road vehicle use and camping”. Due to the close proximity and association with the Grafton ghost town, soon to be listed on the National Register of Historic Places, preserving the landscape around the Grafton cemetery is critical to our goal of preserving this historic landscape.

Over the past five years, the GHPP has seen an exponential increase in the amount of soil and vegetation impacts from ATV use in the South Wash (see photo image 875 on disk) and bikes riding off the cliffs in view of cemetery (see photo image 874 on disk) and now mountain bikers are causing further disturbance by creating a network of bike trails into the Grafton area. This type of use is incompatible with achieving the long-term goals of the GHPP. The BLM’s Route map shows a primitive for the Wood Road, a GHPP board member just hiked that road and reported the road would be impassible by ATVs due to it being narrow (single track); and amount of obstacles (fallen rock); and it is in poor condition (see photos on disk); and it is also a safety issue for ATVs. It is noted on a bike map as an expert bike trail with lots of exposure. ATV use on this historically significant heritage site would negatively impacting the road by causing accelerated erosion of the road surface which undercuts the historic dry-laid stone walls that support the structural stability of the road. GHPP is concerned user groups are going to change the historic alignment by building a new trail, or making shortcuts. We feel it is important to keep the integrity of road intact to reflect the effort of the dedicated settlers who built the road and hauled wood in wagons down this very steep mesa from 75 miles away to build the Grafton schoolhouse.

**Comment:** GHPP is requesting the BLM, as a signee to the cooperative agreement and partner in the preservation of Grafton and surrounding environment to:

- Close the Wood Road to motorized use since it is impassable.
- Designate the Wood Road as a non-motorized pedestrian hike and bike trail.
- Install signage at the top and bottom of the Wood Road to indicate it is closed to ATV use and bikes need to stay on trail. Signage should educate the user the Wood Road is a historically significant heritage site.
- Close the area surrounding the Cemetery, to include the South Wash, to camping, and ATV use.

- Block off the new road created on the cemetery fence line and another road to have just one road leading to the south wash. (see photo images 871 and 872).
- Enforce the filming and photography permit laws to protect the Grafton hills from filming of commercials. Grafton has become known for its beautiful scenery and the steep hills make for good photography of bike stunts and may be a place of illegal film and video activity.

The GHPP supports the responsible use of public lands for recreation purposes, however, the numerous roads and ATV use as well as off trail impacts from bike use mentioned above is severely impacting the historic integrity of the Grafton Cemetery area and Wood Road. Since 1997, when the GHPP was created, the BLM has been an active partner in preserving the historic Grafton ghost town site and we thank the BLM for its continued support. In coordination with BLM, GHPP is willing to block the road next to the cemetery fence; rehab the new bike line in view of the cemetery with the help of local bike community, and post signs so the impacts do not get worse.

**Comment:** The St. George field office should maximize the opportunity to obtain and use information on cultural resources to fulfill its obligations under the NHPA, increase the public's knowledge, and protect the cultural heritage of southwestern Utah.

**Comment:** Prior to designating any routes, BLM must conduct the requisite Class III cultural resource inventory for each route as required by Section 106 of the NHPA. 16 U.S.C.A. § 470f. This will ensure that BLM is aware of the cultural resources in its field office and will not designate routes directly over such resources, or routes that will increase access and associated vandalism of such resources, as it has, unfortunately, done in other field offices.

**Comment:** In order to protect cultural resources, BLM must know where the resources are. Section 106 of the NHPA requires BLM to identify historic properties affected by its decisions and to develop measures to avoid, minimize, or mitigate any adverse effects on historic properties. 16 U.S.C. § 470f; 36 C.F.R. §§ 800.4, 800.6. To comply with the NHPA, BLM must conduct a Class III inventory of all the lands, including each of the routes and "open areas" designated in the TMP, that will be impacted by decisions in its land use plans. Once it identifies these resources, BLM must ensure that its TMP and other actions avoid or minimize harm to these resources. Likewise, BLM must initiate Class III inventories of all designated camping and parking/staging areas, including an adequate Area of Potential Effect that includes all sites visible from the location regardless of distance and all other areas in close proximity to the camping and parking areas.

**Comment:** Unrestricted vehicular access increases the probability that unknown and undocumented archaeological sites will be vandalized. BLM should take this understanding into account when developing its TMP. Limiting motor vehicle access is an effective management tool to further the long-term preservation and protection of archaeological sites.

**Comment:** BLM must conduct a Class III inventory of all designated motor vehicle routes, and other lands that will have surface impacts due to the RMP Amendment or NCA plans. The land use plans should also clearly state BLM's intent to proactively educate recreational users as to proper behavior in archaeologically rich and sensitive areas.

**Comment:** In terms of archeological and historical values:

- BLM's goal should be to protect, conserve, and where appropriate restore archeological and historical sites and landscapes.
- BLM should survey all known or discoverable cultural and historic sites, or those adjacent sites may be adversely affected.

- BLM should determine the sites or areas that are most vulnerable to current and future impact and adopt management actions necessary to protect, conserve, and restore cultural resources.
- BLM should complete a Cultural Resource Management Plan that coordinates with the objectives of the RMP and seeks to provide for an appropriate proactive process of inventorying for cultural resources, making determinations of eligibility for the National Register, and seeking to nominate eligible properties to the National Register.
- BLM should outline specific management actions, such as stabilization, fencing, signing, closures, or interpretative development, to protect, conserve, and where appropriate restore cultural resources.
- BLM should adopt measures to protect cultural resources from artifact collectors, looters, thieves, and vandals.
- BLM should consult with the Native American community to determine whether there are sites or specific areas of particular concern, including sites of traditional religious and cultural significance.

**Comment:** Heritage Corridor Recommendation

This is the time to "securing the areas that are needed before they become so occupied or acquire such value as place them beyond reach..." ( H.W.S. Cleveland 1883). A unique Heritage Corridor exists in Washington County that is being overlooked.

This landscape is partially within and borders newly created Red Cliff NCA (Omnibus Public Lands Bill 2009). The majority of the land is public and administrated by BLM, Dixie Forest and the newly designated Red Cliffs National Conservation Area. The area includes some private patented mining claims along the White Reef and a 13 acre historic park owned by Washington Co and some private home surrounding the park.

The area boundaries are the dramatic red cliff to the west, to the south is the newly created Red Cliff National Conservation Area, to the northeast is the newly created wilderness area (Omnibus PL Bill 2009) within the Dixie National Forest and some public land administrated BLM and to the east by the town of Leeds.

This area is rich in geologic features, unique botanically communities, paleontological sites, Native American, Pioneer and many Mining Sites

**Comment:** The petroglyphs in the Little Creek Area have been suffering vandalism and attempted theft. Because they are on the ground surface, they are also subject to unintentional damage. NO ATV trails should be in this area unless the petroglyphs can be fenced.

**Comment:** Please designate these trailheads and routes with priority given to protecting the archeological areas - which should be inventoried - and the NCAs, wilderness and proposed wilderness areas.

**Comment:** This letter is to inform the St George field office of the BLM that the Paiute Indian Tribe of Utah (PIT) and the Shivwits Band of the Paiutes have strong interests in the future management of public lands in Southern Utah and plan to submit comments in the coming weeks to help guide the management of the legislated amendments to the 1999 St. George Resource Management Plan.

PITU is currently in the process of interviewing elders toward the goal of developing a "Paiute Land-Use Plan, which will assess the important role which public lands and natural resources play" maintaining Paiute culture and the connections which have developed to this land over thousands of year. As this is developed in the coming years, PITU hopes to work with the BLM to discuss these lands and uses of

them by Tribal members. In the current NEPA analysis, the tribe anticipates making specific recommendation to guide the management of Areas of Critical Environmental Concern (ACEG), roadless areas which have not been designated as wilderness in the Washington County legislation, Transportation and Travel Management Planning, and the creation of Resource Management Plans for Beaver Dam Wash NCA and Red Cliffs NCA. In general, PITU elders and leaden want to see their ancestral landscapes protected from developments and managed to ensure long-term sustainable use by PITU members and the larger public. General recommendations from the Tribe include:

- 1) Protection of cultural antiquities, native plants, and wildlife
- 2) Assurances of access to public lands for utilization of these areas for hunting, fishing, gathering, and carrying out ceremonial/spiritual practices, and
- 3) Opportunities to recommend and/or be involved in the management of PITU interests across the landscape.

**Comment: D. Historic Resources**

In your inventory of hails BLM should also document historic buildings, barns and corals that are the fabric of early pioneer settlement. There is no mention of BLM's historic buildings or human made structures in the RMP. These resources are at great risk because of OFIV use. The building at Fort Pearce Wash needs to be protected and maintained.

BLM must carefully consider the effects of all RMP Amendment decisions on the wealth of, historic manmade structures, archaeological and cultural values located in the planning area. Since it will be difficult to evaluate the effect of decisions when the location of cultural resources is unknown, the BLM should undertake an archaeological inventory wherever necessary. In particular, in regards to travel planning, the BLM should consider where motorized and non-motorized routes are directing people, inventory cultural resources along those routes, and carefully consider the potential impacts to those resources.

**Comment: III. TRANSPORTATION PLANNING**

**A. BLM Must Comply with Section 106 of the NHPA for the Comprehensive Travel Management Plan.**

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historic preservation—has expressed concern for the ambiguities in IM 2007-030, in particular the direction concerning the designation of “existing” routes. Letter from Reid Nelson, Assistant Director, ACHP, to Kate Winthrop, Acting Preservation Office, BLM 1 (Aug. 30, 2006); see also Letter from Don L. Klima, ACHP, to Linda Hansen, California Desert District Manager, BLM 1–2 (May 27, 2003) [hereinafter “Klima Letter”] (identifying need to comply with Section 106 when deciding whether to designate a route as “open or closed”)

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We concur with this practical recommendation, which suggests that Class III inventories of “existing” routes must in some and, perhaps, many cases take place, and encourage BLM to prioritize inventories in areas with documented cultural significance, including ACECs with “relevant and important” historic and cultural values like Little Creek, sacred sites identified under Executive Order No. 13007, areas known or likely to contain high site densities and areas where conflicts between OHV use and cultural resources are known or are likely exist. We further recommend that BLM defer designating routes in areas with documented cultural significance until such time as it can complete cultural resources inventories of those routes. BLM recently adopted such an approach in the Record of Decision (ROD) for the Grand Canyon-Parashant National Monument Resource Management Plan, deferring route designations in ten areas with a “high-potential” for cultural resources pending completion of cultural resources inventories. BLM, Grand Canyon-Parashant National Monument ROD 9 (Feb. 2008).

Fourth, BLM must evaluate whether the effects of designating routes for motorized use will be “adverse.” In conducting this evaluation, BLM must recognize the potential for route designations to indirectly, as well as directly, impact cultural resources. See 36 C.F.R. § 800.5(a)(1). Professional archaeologists, as well as BLM, are increasingly finding that sites closer to travel routes are more susceptible to the indirect effects of OHV use, including vandalism and looting. See, e.g., Jerry Spangler, *Chasing Ghosts: An Analysis of Vandalism and Site Degradation in Range Creek Canyon, Utah* 22 (2006) (documenting high rates of vandalism at sites located within 200 meters of a road); Peter W. Bungart & Anne Raney, *Faint Traces in Fragile Places: Cultural Resources Survey Along Selected Roads & Routes In The Sonoran Desert National Monument* 95 (2009) (noting that the “overwhelming consensus among the archaeological profession, land managers, and concerned citizens is that the closer a site is to a motorized vehicle route, the greater the risk from vandalism or inadvertent disturbances.”); Letter from Michael Stiewig, Price Field Office, BLM, to Lori Hunsaker, Deputy Utah SHPO 1 (July 7, 2009) [hereinafter “Stiewig Letter”] (“Indirect and cumulative [adverse] impacts [to cultural resources on the West Tavaputs Plateau] could potentially result from the . . . opening or improvement of various travel routes, including vandalism.”). Additionally, BLM has recently recognized that “increases in traffic on . . . roads” can cause other kinds of indirect adverse effects by altering the “setting, feeling, and association” of cultural resources. Stiewig Letter at 1. Consequently, BLM must “take into account” the potential for route

designations to cause vandalism, looting, alterations to the setting, feeling or association of cultural resources and other potential indirect adverse effects.

Finally, BLM must develop measures to “avoid, minimize or mitigate” any adverse effects resulting from the Travel Plan. In cases such as this one where it is unlikely that adverse effects on cultural resources will be fully determined before the undertaking is approved, the Section 106 regulations allow BLM to develop a “programmatic agreement” (PA). 36 C.F.R. § 800.14(b)(1)(ii). This PA would then be developed in consultation with the Utah SHPO and other consulting parties and would list the specific actions that BLM would take in order to identify cultural resources, to the extent BLM had not done so already, and then avoid, minimize or mitigate adverse effects, including closing routes or otherwise limiting/controlling motorized travel within areas of documented cultural significance.

**Comment:** In terms of geologic and paleontologic resources:

- BLM’s goal should be to protect and conserve special geologic formations and paleontologic resources.
- BLM should determine the geologic and paleontologic sites or areas that are most vulnerable to current and future impact and adopt management actions necessary to protect, conserve, and restore these resources.
- BLM should prohibit the collection of any specimens.
- BLM should adopt measures to protect paleontologic resources from looters, thieves, and vandals.
- BLM should define the level of inventory needed to provide a basis for understanding the distribution, comparative importance, and potential uses of paleontologic resources (i.e., relative sensitivity, relative opportunities for interpretive development, relative scientific importance, relative potential for research and education).

## FISH AND WILDLIFE

**Comment:** Wildlife Habitat

The 630,000 acres of the St. George planning area are home to an interesting population of birds and other forms of wildlife. Three ecological regions meet here: the Great Basin, the Colorado Plateau, and the Mojave Desert. This result is extraordinary diversity of the plant and animal life. Indicative of the importance of this area for birds is the recognition of the Lytle Ranch Preserve, on Beaver Dam Wash, as one of 21 Important Bird Areas of Utah by the National Audubon Society. At the Lytle Preserve more than 200 species of birds have been recorded, including nearly 20 that are found nowhere else in Utah.

The watercourses and the riparian habitat along them are crucial for wildlife in this arid region. We urge BLM to focus on protecting the wildlife values of those riparian zones in the new plans, identify those places where the impacts of off-highway vehicles (OHV) have degraded habitat values, and include measures to stop the degradation and restore the damaged areas. Under Subtitle O of PL 111-11, the purposes of the NCAs include “conserve, protect, and enhance” the ecological and wildlife resources of the NCAs. The draft plan should reflect that emphasis by taking action to restore wildlife values.

The plan for the NCAs should establish designated sites and trails for wildlife-watching with appropriate parking areas. Birding trails may be an effective way to introduce visitors to the interesting species of Beaver Dam Wash and Red Cliffs.

**Comment:** OHVs have a serious impact on wildlife values, especially those routes in riparian zones. Vehicles typically cross and re-cross a stream, creating many sources of siltation. Silt deposition takes a

toll on aquatic species, which are the food source for many birds and mammals. Vehicles also destroy vegetation in the riparian zone by flattening herbaceous plants, shrubs and small trees. Leaking engine fluids can poison the aquatic ecosystem.

The new plan should provide for restoration of damaged areas and closure of OHV routes where damage has occurred. Cross-country travel should be banned in all areas. The plan should bar OHVs from all routes that are not needed for specific public purposes identified in the plan. Multiple routes to the same destination, or routes that go nowhere, should be closed and reclaimed.

The “High Desert Off-Highway Vehicle Trail” established by PL 111-11 should be routed to keep vehicles strictly out of all riparian habitat and other valuable wildlife habitat and away from areas used for quiet recreational activities such as wildlife-watching, hiking, picnicking and camping.

The plan should make it easy for BLM to control OHV traffic by requiring OHVs to enter at designated sites, insofar as possible. At these designated entry points BLM can provide parking for trailers and restroom facilities. A fee may be charged to cover expenses, as is done at BLM’s Little Sahara Recreation Area, a popular OHV area near Delta, Utah.

**Comment:** I would also like to see that one of the natural resources be restored and that's to end the wild horse round ups. You are destroying one of our most valuable inheritances we leave our children and grand children.

**Comment:** The RMPA and RMPs should adopt planning and decision-making processes (including data collection, analysis, and monitoring) that employ measurable planning objectives at multiple biological scales (i.e. fish and wildlife populations, habitat and ecosystem conditions) to ensure viable wildlife populations.

**Comment:** To appropriately designate and protect wildlife corridors within the St. George Field Office, BLM should:

- collaborate with other state and federal agencies and non-governmental groups to obtain current data regarding crucial wildlife habitat and corridors;
- connect already designated wilderness areas and other reserves to ensure that wildlife populations have the ability to easily move between large areas of protected crucial habitat;
- identify species that will act as focal species for identifying important wildlife corridors and will also act as indicators for how well the wildlife corridors are working;
- use the best available science to decide upon the exact areas to be designated and protected;
- ensure that all designations include specific provisions regarding management so that designated wildlife corridors are protected and can function as designed; and
- constantly monitor the effectiveness of designated wildlife corridors and implement adaptive ecosystem management strategies.

Additionally, BLM should designate our proposed wildlife corridor priority biological areas/ACECs, including recommended management prescriptions to ensure effective protection and wildlife crossing areas for further evaluation. Moreover, BLM should incorporate the data on core habitat, linkages and buffer areas, as well as wildlife corridors, to guide other management decisions and needed research.

**Comment:** The Reserve was created specifically to aid the threatened Mojave Desert Tortoise, but the PUP and HCP that this area has been managed under have not been effective enough, or had a focus that was precisely tailored enough, towards this goal. See, e.g., HCP, § 2.0 page 13 (stating purpose for creation of Reserve); Robert Williams’ and Larry Crist’s joint letter to Washington County Commission

on June 4, 2007 (Mentioning the continued decline in tortoise populations). We recommend that BLM's management of all the Red Cliffs NCA's lands reflect the HCP's assertion that preservation of the tortoise and other threatened and endangered species is paramount. See, e.g., HCP, § 2.0 at 13 (stating purpose of creation of Reserve). As the PUP states, "[r]ecreational access, if not properly managed, has the opportunity to degrade critical tortoise habitat or directly contribute to mortality and lowered reproductive rates," and therefore we recommend that recreation be restricted, where necessary, to prevent damage to tortoises', or other endangered, threatened or candidate species', populations or habitat. See PUP at 10. Adaptations in management to respond to decreases in tortoise population need to be more proactive, easier, and more responsive to the exigencies that these changes present. This will require increased, adequately funded, and regular monitoring of population numbers and habitat quality. Consideration of more active management and study of grazing practices is also needed and permitted by the legislation creating the NCA and applicable law.

**Comment:** Off-trail uses in the lowland zone should continue to be prohibited and language identifying this restriction should be clear and explicit. Trails and roads in this zone should be reviewed, and those that are duplicative or segment habitat should be removed. Furthermore, the education center should be sited away from sensitive habitat.

**Comment:** Studies should be conducted to discover populations of, or suitable habitat for, threatened, endangered, and candidate species in the upland zone and off-trail camping and travel should be restricted in those zones at a minimum. Also, further development should be categorically banned and private lands within the NCA should be prioritized for acquisition and management as the NCA once acquired.

**Comment:** In preparing the Red Cliffs NCA RMP, BLM should take the opportunity to increase the conservation focus of management set out in the HCP and PUP.

**Comment:** BLM must address safety and noise effects to non-motorized users and wildlife.

**Comment:** C. Virgin River

One of the Lands Bill provisions for the Red Cliffs NCA is "to protect each species that is listed as endangered." The woundfin minnow was one of the earliest species federally listed as endangered in 1970. The Virgin River chub was listed as endangered in 1989. The Virgin River Resource Management and Recovery Program, (Virgin River Program) a multi-agency collaborative recovery effort has failed to protect these species and in fact the population of woundfin has decreased dramatically as well as the other native fish. The 5 mile upper Virgin River reach of critical habitat of the woundfin and Virgin River chub populations, below Pah Tempe Hot Springs and LaVerkin Creek, is within the BLM's Red Cliffs NCA. It is imperative that this, formerly the best habitat be included in the NCA's management plan and for BLM to take a more active lead role to protect these species. The BLM must take a "hard look" at the dewatering and degradation of water quality in this reach and its impact on the fish.

**Comment:** C. Wildlife Corridors

It is well known that habitat fragmentation leads to species extinction. Scientists have been recommending landscape connectivity to reduce the effect of habitat isolation as a means of ensuring species migratory mobility and genetic diversity. In this BLM process, BLM must consider the impacts of increased OHV use in the back country on wildlife corridors and winter range or lambing areas. BLM should reduce motorized road and trail density in important wildlife areas and roads and trails should be a mile apart. with the impacts of warming BLM should preserve as much habitat and connectivity as possible to build ecological resiliency.

In the travel plan BLM should designate motor-free Quiet Use Zones in areas that emphasize wildlife needs and relatively low-impact non-motorized recreational activities. In addition, BLM adopted the Standards for Public Land Health and Guidelines for Recreation Management for BLM Lands In Utah. Which include Rangeland Health Standard:

1. "Protect wildlife and /or habitat by:

i. Maintaining interconnecting wildlife corridors and, to the extent practical, avoid fragmentation of areas used by wildlife.

ii. Controlling recreational activities that would interfere with critical wildlife stages such as nesting, reproduction or seasonal concentration areas.

iii. And in the 1999 RMP BLM stabs preservation of migration routes are important"

**Comment:** That the BLM include in its analysis an alternative that would eliminate grazing on any lands acquired through exchange that contain habitat for threatened species such as the desert tortoise and the Holmgren milk vetch, or any land acquired on the basis of an environmental benefit.

**Comment:** In addition, if there are any important Mojave desert tortoise habitats outside of the NCAs, and consistent with the HCP, I recommend that they be considered for strong ACEC designations. Such designations should eliminate livestock grazing (which is an identified threat in the 1994 FWS Mojave desert tortoise recovery plan) and keep roads and trails to the absolute minimum. Roads that are not primary access routes should be considered for limitation to administrative uses only, such as fire fighting and research. In light of documented population declines and expanding habitat loss/fragmentation through fires, development, and other causes, everything that can be done to advance tortoise conservation and recovery should be done.

**Comment:** As a veterinarian with a strong interest in wildlife, I feel it is especially important to manage land for the desert tortoise, and other species threatened by development in the region.

**Comment:** I'm all for protecting endangered species in areas like the Red Cliffs NCA and the Beaver Dam Wash NCA. I love nature and all its creatures. But closing them off for the protection of a tortoise that no one I know has ever seen doesn't make a lot of sense. Your resources are not enough to be there constantly monitoring the area for people where they shouldn't be. Haven't the people been respecting these creatures without all of this regulation already?

**Comment:** The Red Cliffs Desert Reserve (RCDR) was set aside as mitigation to offset development of 12,264 acres of tortoise habitat and take of 1,169 desert tortoises. The main goal of the RCDR is to maintain a viable population of tortoises. The Washington County Habitat Conservation Plan specifically states that, within the RCDR, uses will be carefully controlled and all management actions will place the desert tortoise as the highest priority. The Division of Wildlife Resources encourages the BLM to continue to place the protection of the desert tortoise and its habitat as the highest priority throughout this planning process. To accomplish this goal, the Division of Wildlife Resources suggests the following actions:

1. Continue to limit recreation use to designated trails within the lowland zone in order to minimize degradation and loss of tortoise habitat.

2. Continue the enforcement of recreation restrictions that protect the RCDR.

3. Continue to limit OHV travel to designated roads within the National Conservation Areas.
4. Encourage grazing practices that prevent further tortoise habitat degradation with the NCAs. The Division of Wildlife Resources notes that the tortoises have lost a substantial portion of their habitat due to recent wildfires and dominance of invasive species within the areas.

**Comment:** Congress designated the Beaver Dam Wash and Red Cliffs National Conservation Areas in part to protect and aid in the recovery of the tortoise and its habitat. BLM must ensure that its land use plans live up to the task of not only protecting these species, but enhancing their recovery.

## LIVESTOCK GRAZING

**Comment:** Attn. Project Manager: Please be advised the Act. specifically allows historical grazing to continue in the Beaver Dam Wash NCA. Season of use and number should not be adjusted.

**Comment:** The Act also states historical use should be enhanced and protected. This includes use of trails and roads, accessory fences, pipelines, salt grounds and cattle gathering areas. The wash bottom should also be open to motorized travel as this is naturally restored annually by floods.

**Comment:** Grazing as I read the land bill is a use on the public land to be kept in use. A - It is a historical use since 1850's; B - It is a cultural use as it was the main cash crop for many generations and is an important part of our western heritage; C - It has a big economic effect as well. You put a multiplier to sales of livestock and the industries it supports - it does create an inflow of dollars from outside buyers as calves go to feed yards in the Midwest; D - The season of use according to the land bill should remain the same; E - The numbers of AUM's should not have any reduction as well.

**Comment:** Ranchers should have access to water lines and fence maintenance - in roadless areas.

**Comment:** That the BLM include in its analysis an alternative that would eliminate grazing on any lands acquired through exchange that contain habitat for threatened species such as the desert tortoise and the Holmgren milk vetch, or any land acquired on the basis of an environmental benefit.

**Comment:** As a member of a family who has been ranching on the Beaver Dam Wash for five generations, going back nearly 100 years, I believe it is important to continue to recognize the importance of grazing in the newly formed national conservation district. Grazing in this area has been of significant historical, cultural, and economic importance in Washington County and the region for several decades. Current ranching practices including gathering cattle, checking and maintaining water lines, fencing, and all other aspects of a ranching operation need to be allowed under the guidelines of the conservation district. Working, successful ranches have, and can continue to provide an important cultural and educational aspect of the Beaver Dam Wash Conservation Area.

**Comment:** Loss of traditional and locally-valued uses. I am also concerned that the new planning process will result in new limitations and restrictions on uses that are historical, tradition, and otherwise locally valued. For example, I am concerned that traditional livestock range will be closed as a result of wilderness or similar designations. I believe that traditional uses should be given some level of deference in the planning process, in order to protect their historical and cultural value whenever possible. I also believe that other locally-valued uses should be carefully preserved to the extent possible and not restricted in favor of uses that are more politically favored.

**Comment:** Eliminate livestock grazing in the Beaver Dam NCA. Grazing threatens the health of the entire ecosystem.

**Comment:** I live in Washington County and am glad to have this natural habitat so close to my home. However, I am concerned with the frequent ATVs driving around, gunshots in signs, and for my safety when I am alone hiking in this area. Why does this area need to be developed further? Shouldn't we have ANY lands that can remain as they are???

Why can't the natural wildlife habitat continue to roam freely in this area? My idea of the BLM is to protect the public lands – not waste them. Why can't there be “primitive zones” in areas to restrict off-road vehicle travel, protect sensitive species, and ensure that these areas retain their wilderness character? I also don't think these lands should be available for grazing cows and more pollution from methane gases. We don't need any more roads in these areas. The ones that already exist should remain primitive. Have you ever been out to Canyon lands or Arches or Death Valley? These are by far the best of the national parks because they have remained “rather” undeveloped (unlike the South Rim of the Grand Canyon and Yosemite Valley). Here in southern Utah, I like so many other people, came to escape the city. Do not ruin these public lands for people like us who use them with no impact.

I support conservation of Beaver Dam Wash and Red Cliffs NCAs to protect the sensitive, plants, animals and other resources in Washington County.

**Comment:** I am writing to ask BLM to protect the lands proposed for wilderness designation in ARROWA but not yet protected by Congress by restricting ORV use in these areas. ORVs have a significant impact on wilderness values and wildlife, and ORV routes fragment wildlife habitat and entire ecosystems. Additionally, I ask BLM to eliminate domestic livestock grazing in the Beaver Dam Wash and Red Cliffs NCAs. Domestic livestock grazing is incompatible with the protection of the ecological values and sensitive species in the Mojave Desert. Grazing threatens the health of the entire ecosystem.

**Comment:** I also encourage the BLM to eliminate domestic livestock grazing in the Beaver Dam Wash and Red Cliffs NCAs. Domestic livestock grazing is incompatible with the protection of the ecological values and sensitive species in the Mojave Desert. Grazing threatens the health of the entire ecosystem.

**Comment:** Item #5: Item #4 and the effects of ATV/ORV public lands damage ties into my concern about the effects of livestock grazing on public lands where their movement seems to be tied to the invasion of problematic vegetation such as cheatgrass. It seems essential that BLM look into this matter carefully when working the RMP specifics and determine if livestock grazing on BLM lands is in the best interest of preserving these important areas from the expansive wildfires that can be created by cheatgrass. It makes economical sense and biological sense to review and revise the grazing policy. Current fees to those who graze their animals don't seem to be keeping up with the problems created. Of particular concern are areas that are established as ACECs. There will probably be strong political pressure to continue with the status quo, but as time passes and the effects of grazing are determined and analyzed scientifically, those who benefit from these grazing privileges should be educated to understand the need for change. This has been a concern for a while and changes in the system should not be deferred any longer. It is particularly offensive the fee for the grazing is so low and does not serve to support the management of these lands on which some benefit economically at the expense of others. There's been a recent president's directive that recommends reforming or eliminating the money-losing, habitat-destroying public lands livestock grazing program.

**Comment:** I urge the BLM to close redundant, unnecessary, and ecologically-damaging vehicle routes in the new Beaver Dam Wash and Red Cliffs NCAs. These NCAs include several rare and/or endangered species of flora and fauna—including the desert tortoise—that require protection. I also request that the vehicle routes that are designated within these NCAs serve the conservation-focused purpose and need of the NCAs and minimize impacts to resources as required by law. The BLM should also close, or limit to nonpublic administrative use only, the routes in the Designated Road area of the Beaver Dam Wash NCA

in order to protect fragile habitat for the desert tortoise and other sensitive species. I urge the BLM to eliminate livestock grazing altogether within the Beaver Dam Wash and Red Cliffs NCAs. Livestock grazing is simply incompatible with the protection of the ecological values and sensitive species within these NCAs. Livestock grazing of invasive species disturbs the natural ecosystem and native plant and animal species.

**Comment:** Eliminate domestic livestock grazing in the Beaver Dam Wash and Red Cliffs NCAs. Domestic livestock grazing is incompatible with the protection of the ecological values and sensitive species in the Mojave Desert. Grazing threatens the health of the entire ecosystem.

**Comment:** As one example of new scientific information, there have been studies since 1999 on cheatgrass that should shed new light on this massive expanding threat to the ecological and watershed health of Washington County, including BLM lands and resources. The cheatgrass can carry fire in areas where this did not historically occur, and these fires have already brought devastating impacts, and promise to bring much more unless greater and more effective remedial measures are adopted and implemented. One aspect of the studies is correlating livestock grazing with higher densities of cheatgrass, perhaps due to the cumulative action of many hooves breaking up sensitive cryptobiotic soil crusts. It is essential that BLM apply this new science to management as soon as possible, and this should include taking a hard, fresh look at BLM authorized livestock grazing.

**Comment:** Another overview comment relates to BLM's use of possible new or expanded Area of Critical Environmental Concern (ACEC) designations to fulfill the new statutory objective to better identify and protect priority ecological resources. Such designations are indeed an important tool, and the actual land use restrictions decided upon to achieve the purposes of those designations are crucial. Adding an ACEC polygon to a map does little; it is the decisions tied to the designation, and their adequate implementation, which are the keys to an ACEC's success. In addition, there are other management tools to achieve this new statutory objective.

For example, allowing continued livestock grazing in an ACEC established to protect riparian habitats and associated special status species may greatly weaken or undermine the basic integrity of that ACEC. The same may be said about an upland ACEC or NCA established, in whole or in part, to protect Mojave desert tortoises or other special status species. This is due to the link between livestock grazing, breaking up of cyptobiotic soil crusts, higher densities of cheatgrass, and the associated increased risk of more devastating habitat-converting fires. I realize that there may be strong political pressures to retain historic livestock grazing uses. However, BLM is obligated to follow the law and best available scientific information which I believe means that some meaningful management changes are reasonable, necessary, and even long overdue. Since decisions on whether existing BLM livestock grazing allotments should remain available or become unavailable for continued grazing can only properly be made during an RMP revision process, I recommend that the current Dixie RMP revision process include the fresh consideration of those decisions. The longer this consideration may be deferred or postponed, the worse damage that may occur, whether to riparian or upland habitats and associated special status species.

**Comment:** Please maintain domestic livestock grazing in the Beaver Dam Wash and Red Cliffs NCAs. Domestic livestock grazing is compatible with the protection of the ecological values and sensitive species in the Mojave Desert. Grazing do not threaten the health of the entire ecosystem.

**Comment:** Likewise, grazing leases in these and other sensitive areas should be withdrawn. Cattle have no place in desert wilderness because they too do grave damage to natural areas.

**Comment:** All remaining domestic livestock grazing in the Beaver Dam Wash and Red Cliffs NCAs should be eliminated. Next to illegal OHV route proliferation, I believe that such grazing poses the largest

long-term threat to the ecological health and integrity of these NCAs. The soils and native species in these NCAs are not ecologically adapted to ongoing grazing pressure by large domestic animals. This pressure has already cumulatively contributed greatly to the huge threat of cheatgrass fire habitat devastation and conversion to largely sterile, alien annual grasslands. We won't be able to reverse this serious downward trajectory by maintaining the status quo. Livestock grazing and restoring ecological health in the Mojave Desert are mutually exclusive.

**Comment:** The Red Cliffs Desert Reserve (RCDR) was set aside as mitigation to offset development of 12,264 acres of tortoise habitat and take of 1,169 desert tortoises. The main goal of the RCDR is to maintain a viable population of tortoises. The Washington County Habitat Conservation Plan specifically states that, within the RCDR, uses will be carefully controlled and all management actions will place the desert tortoise as the highest priority. The Division of Wildlife Resources encourages the BLM to continue to place the protection of the desert tortoise and its habitat as the highest priority throughout this planning process. To accomplish this goal, the Division of Wildlife Resources suggests the following actions:

- I. Continue to limit recreation use to designated trails within the lowland zone in order to minimize degradation and loss of tortoise habitat.
2. Continue the enforcement of recreation restrictions that protect the RCDR.
3. Continue to limit OHV travel to designated roads within the National Conservation Areas.
4. Encourage grazing practices that prevent further tortoise habitat degradation with the NCAs. The Division of Wildlife Resources notes that the tortoises have lost a substantial portion of their habitat due to recent wildfires and dominance of invasive species within the areas.

**Comment:** On many of the lands managed by the St. George field office, livestock grazing is not sustainable and is an inappropriate use of limited resources. In completing its RMP Amendment and NCA RMPs, BLM must take a considered, scientific look at the impacts that livestock grazing has on species and ecosystems in the fragile Mojave Desert, Great Basin, and Colorado Plateau environments in Washington County.

**Comment:** NEPA requires BLM to prepare land use plans that assess “the specific environmental effects of the [grazing] permits issued, and to be issued, in each district.” *Natural Resources Defense Council, Inc. v. Morton*, 388 F. Supp. 829, 841 (D.D.C. 1974), *aff’d per curiam*, 527 F.2d 1386 (D.C. Cir. 1976), *cert. denied*, 427 U.S. 913 (1976). A general overview is not sufficient. Rather, the plans must include “the detailed analysis of local geographic conditions necessary for the decision-maker to determine what course of action is appropriate under the circumstances,” *id.* at 838-39, and the “actual environmental effects of particular [grazing] permits or groups of permits in specific areas.” *Id.*

**Comment:** Congress directed that Beaver Dam Wash and Red Cliffs NCAs be managed with an emphasis on resource protection and conservation. In the NCAs, the ecological, scenic, wildlife, recreational, cultural, historical, natural, educational, and scientific values are paramount. If livestock grazing imperils the resources for which these NCAs were designated, BLM must eliminate and/or greatly reduce livestock grazing on these lands.

**Comment:** Alternatives for these NCAs should include No Livestock Grazing and No ATV/Dirt Bikes.

**Comment:** For non-NCA areas, Alternatives should also include significantly reduced livestock grazing and significantly reduced ATV/Dirt Bike access. Voluntary permit buyouts should be allowed to reduce livestock grazing.

**Comment:** Protect all wilderness quality lands by closing them to off road vehicles and livestock

Address livestock grazing and the science of management including that in the Appendices. Livestock have the most significant impacts on soil, water, wildlife and plant communities and ecosystems due to their near universal presence across the RA.

No reallocation of forage should occur for livestock in allotments that have not been grazed or have use suspended, except to reallocate that forage to watershed protection and wildlife.

All ACECs should be closed to livestock grazing using voluntary permit buyouts. No new leasing for oil, gas and minerals should occur in these areas and in all other areas until the current leases expire and/or are being developed. The low percentage of active leases relative to those leased dictates no further leasing during this planning period and until former leases are closed and restored.

The Northern Corridor should not intrude on NCAs or ACECs.

The riparian goal of PFC is totally inadequate because PFC is only a minimal hydrologic evaluation, is highly subjective and biased. PFC does not address habitat or water quality. Regarding stubble height standards, they are ineffective because they are typically not enforced, do not represent use in riparian areas and little strips of sedges do not filter sediment. For filtering sediment, intact riparian areas with vegetated stream banks and fully vegetated floodplains are needed to reduce erosion and filter sediment. These deficiencies should be addressed by closing all riparian areas to livestock.

Rangeland Health is used as a goal, yet RH, like PFC is subjective, has not been documented to result in improved conditions and is a mere guess subject to great bias. Reference areas should be the standard. These should be ungrazed, and their characteristics used to judge conditions in areas grazed or used for mining, oil and gas, oil shale, and other extractive or land disturbing uses.

Drought management should close all allotments during years of below normal precipitation due to the long recovery times for native plants when grazed during dry years. This is especially the case for plant communities and soils that are already damaged. Forage should be allocated 100% to plant health, wildlife and watershed protection during below normal years, which occur more than half the time.

Due to energy and global warming issues, off-road vehicles including dirt bikes, ATVs, aerial vehicles should be banned from the RA. Four wheel drive vehicles (Trucks, SUVs) should be limited to main roads and dispersed camping areas adjacent to roads. Self-powered non-motorized recreation should be emphasized. No new dispersed camping locations should be allowed.

No mineral, oil and gas leasing or development should occur in roadless and/or wilderness quality lands or habitats for sensitive species.

Spring sources and their watersheds must be protected from surface disturbance, including livestock grazing and trampling. No further water developments should occur.

Maintenance of water tables in riparian and wetland areas should be a mandate because water is precious in arid environments and BLM should not sacrifice soil and ground water storage to activities such as grazing and trampling of livestock or OHVs. Buffers for all uses must be established to restore these

degraded systems. They should be closed to livestock to control coliform pollution, provide a buffer to protect water quality, limit erosion and sedimentation and due to their importance for wildlife.

Predator Control should be eliminated and let natural processes occur. Owners of livestock grazed on public lands must accept this risk. It is time to allow coyotes, foxes, badgers, ravens, mountain lions and others to function in their role of keeping deer out of riparian zones, controlling rodent populations, consuming carrion and providing the ecosystem benefits that come with predators. Livestock owners should not be allowed to kill predators as there are many methods they can use to protect their livestock that don't result in killing of predators.

Wild horse and burro numbers must be managed within the carrying capacity of the land, considering the need for forage for wildlife, riparian, soil and vegetation impacts. These are not native species and should be extremely limited in range and numbers. Forage allocations should go to wildlife and watershed protection before horses and burros.

Fire and Fuels Management should include recognition of the role of livestock in fostering cheatgrass, juniper expansion, weeds and invasives, and loss of biological crust. Livestock should not be grazed in areas of erodible soils, with potential for biological crust development, where cheatgrass exists or areas that are susceptible to cheatgrass invasion or juniper expansion.

Lands not available for livestock grazing should include areas with soils subject to moderately high to high erosion by wind and water and slopes over 30% in addition to the areas listed. Riparian areas should be placed off limits to livestock due to the severe degradation and the need to "accelerate restoration" as required by FLPMA. Tinkering around with Rangeland Health and PFC assessments with their inherent subjectivity and bias or riparian stubble height measures which are universally abused and have not proved effective is a flawed approach. These should be abandoned in favor of definitive actions and quantitative based monitoring with comparisons to reference areas instead of kicking the can down the road while the land, water supply and wildlife suffer for more decades.

Standards for management of sensitive or endangered species habitats should be science-based and include quantitative criteria for habitats. A required monitoring program should be implemented to ensure the standards are met. RH and PFC standards are inadequate for this purpose and do not relate to potential habitat quality.

Permits that are relinquished or AUMs not in Active Use should be retired for watershed protection and wildlife. When opportunities for permit buyouts are available, those buyouts should be allowed to lead to permanent allotment retirement.

Mineral, coal, oil and gas leasing should be subject to bond and specific restoration requirements that will restore the ecosystem to pre-development condition including the plants, soils and wildlife.

**Comment:** On May 8, 2004, WWP submitted a review of livestock grazing management science to all Field Offices and the State Office in an effort to have BLM incorporate the best available science into its range management. A copy of that document is included with these comments as Appendix 1. In addition, an update of the AUM forage consumption value to reflect current livestock weights was completed in 2008. This analysis is also attached as Appendix 2. It shows that the forage values BLM uses underestimate forage consumption by livestock such that taking into account the most current information on livestock weights would automatically reduce current permitted numbers in each allotment by about half. WWP has also reviewed the impacts of livestock on water quality, watersheds and riparian areas showing that the impacts are well understood. BLM, in relying on the State of Utah to list streams in its

TMDL process, is abrogating its responsibility to manage so that water quality standards are met. A copy of that review is included as Appendix 3.

**Comment:** The St. George FO should conduct a capability analysis to determine the areas that might be available for livestock grazing, excluding steep slopes >30%, low forage production <200 lbs/areas, ecosystems converted by wildfire or invasive weeds, and the ability of sensitive soils to respond following impacts (arid elevations, reclamation, soil chemistry, drought). Then, in consideration of wildlife competition and recreation impacts, determine those lands that will be made available (suitable) for livestock grazing. Areas that should not be considered suitable include riparian areas, wilderness areas, wilderness study areas, ACECs, sensitive soils, crucial wildlife areas, and public campgrounds and other administrative sites. Once this is done, BLM should then apply the current forage capacity and livestock consumption rates to determine the appropriate stocking rates and incorporate management as described in Appendix 1. This analysis, which will result in significantly reduced grazing, should determine the levels and management of livestock for analysis for comparison with a NO Grazing Alternative and the Status Quo, or No Action Alternative.

**Comment:** BLM must analyze the role and values of predators in controlling rodent populations and fulfilling their role in a healthy ecosystem.

**Comment:** The role of livestock grazing in establishing infestations of cheatgrass or other flammable conditions such as increasing juniper expansion, sagebrush expansion and increasing fuel loads must be addressed and the costs and benefits evaluated.

**Comment:** BLM should analyze science based utilization standards for upland and riparian areas, stream bank stability standards or other critical livestock management mechanisms.

## AREA/ROUTE DESIGNATIONS

**Comment:** We have some skepticisms and concerns with the development of this travel plan. Some thought:

- 1- A complete trail / road inventory with on the ground field trips with users.
- 2- Plans to develop specific user trails - single track, ATV, 4WD, Rock Crawler
- 3-Be proactive in your planning, plan ahead and not wait until there is a problem to act.
- 4- Utilize volunteers to help, many are willing to spent considerable time in the effort.
- 5- Have a mechanism in place to quickly resolve mistakes and errors in a management plan which would allow opening of previously disturbed trails and or areas without a full "EA".
- 6- Facilitate a committee of: Users, County, State and Federal people to chart long term goals and have the ability to change management plans, where and when needed.
- 7- Allow new data to be submitted during the complete process.
- 8- Stop reducing Motorized Off-Highway Vehicle opportunities, you keep pushing us in smaller and smaller areas.
- 9- The quality of the trail is important not just the mileage.

**Comment:** I have to say that I'm very concerned about the Alternatives presented in the proposed Travel Management Plan. I do NOT support being presented with a "range" of Alternatives in which all represent a reduction in OHV opportunity. Neither the letter nor spirit of the BLM's planning policies, BLM's existing Resource Management Plan or the Washington County Growth and Conservation Act suggests, let alone mandates, an aggressive closure plan. Closure is not management. Closure is abdication of responsibility! The agency must develop a wide range of Alternatives, including an Alternative that enhances motorized and mountain bike trail-based recreation.

**Comment:** I suggest that the cumulative loss of motorized recreational opportunity be brought in as a formal Planning Issue. Motorized recreational opportunities have been reduced throughout the region. Recent planning efforts in all management areas surrounding the planning area have closed thousands of miles of roads and trails. Additional future closures can be expected on the Arizona Strip. The amount of closures has reached a critical mass. Every single mile of motorized route that is open today is extremely important. Further closures will have a larger impact than those in the past. Trail closures cause an increase in useage pressure and thus increased maintenance headaches on remaining trails. The loss of trails MUST be reversed.

**Comment:** The second Planning Issue I suggest is "trail experience distinct from road experience" issue. It is important to recognize the distinction between "trails" and "roads" during this planning process. Providing an arguably adequate road system does not in any way begin to address the demand for motorized single track, full sized 4x4 and ATV trails.

**Comment:** I want to see the area remain as it is now with all the available opportunities for OHV recreation we now have to remain open to the public. With proper education and stewardship, as well as enforcement, we can continue to use our public lands while at the same time protecting the resources.

**Comment:** I am writing to encourage as much motorized-use areas as possible. The elderly and handicapped must have motorized access or the public land is effectively taken from them. Public land is for ALL the public, not just a select few who are young and healthy enough to hike.

**Comment:** I want to speak out in favor of "trails" vs roads. Our machines are made for trail riding, we expect trails for that purpose. The 50-52 inch rule is perfect in setting a standard on who can use ATV trails, and who can not. I know that won't set well with UTV, side by side users. But if we make the trails bigger, the manufacturers will keep making the machines bigger.

**Comment:** Having observed the destruction of large areas of desert by ATVs, dirt bikes and other off-highway vehicles, it is obvious that their use should be generally limited to existing roads and trails. The dust, soil erosion, habitat destruction, noise, litter, and visual degradation accompanying unlimited off-highway access are all too apparent in this region. The only open access areas should be in designated OHV "parks" with definite boundaries, such as the one known as "the staging area" near Washington Dam, or the dunes on Sand Mountain. Outside of such designated areas there should be NO open cross country areas when OHVs are free to roam. I enjoy traveling unpaved backcountry roads in my Jeep. But, I stay on the roads. That should be the rule for everyone.

**Comment:** ATV use. ATV use is a locally-valued use. I believe that ATV use should be preserved in places where ATVs have typically or historically been used. I also believe that with smart designation of trails, extensive ATV opportunities can be preserved on public lands while still allowing conservation and other recreational uses to be represented. For many people, ATVs are the best or only way to enjoy public lands and severely limiting their use can effectively bar many who would otherwise find enjoyment in the public lands. In addition, ATV use can be an economic boon to the local area, as both locals and visitors take advantage of established trails and local businesses benefit from dollars spent on the activity. Despite

this, I fear that ATV use is generally perceived by many as a destructive and less favorable use of public lands and thus less worthy of preservation. I believe its value far outweighs any concerns, that it can be properly managed, and serious attention should be given to widely preserving ATV use throughout our public lands.

**Comment:** I beg of you to consider all the club and family members who love ATV-ing. There is so much land for all users, hikers, horseback riders, and ATVs. Please leave all the trails open for all of us and not just a few.

**Comment:** I frequently take my family atv riding, hiking, camping and exploring in many areas of southern Utah and Nevada. This is good clean family recreation and I want to see off road travel policy kept as it currently is. No more public land access should be taken away from recreational off highway vehicle use by any means. Public lands belong to the public, all the public. People choose motorized transportation over foot travel hundreds to one and access to our public lands needs to reflect this by keeping land open to ATV access and off highway travel. Please make sure my comments are part of the public record to be considered during land use hearings.

**Comment:** Can you please STOP the destruction caused by ORVs & ATVs? They are destructive machines run by people who think they are having fun. But....having the wrong kind of fun! Destroying our earth with these noisy, polluting machines IS NOT what should be happening anywhere on earth. Please halt ORV/ATV use on our public & national lands.

**Comment:** I am writing to ask BLM to protect the lands proposed for wilderness designation in ARWA but not yet protected by Congress by restricting ORV use in these areas. ORVs have a significant impact on wilderness values and wildlife, and ORV routes fragment wildlife habitat and entire ecosystems. Additionally, I ask BLM to eliminate domestic livestock grazing in the Beaver Dam Wash and Red Cliffs NCAs. Domestic livestock grazing is incompatible with the protection of the ecological values and sensitive species in the Mojave Desert. Grazing threatens the health of the entire ecosystem.

**Comment:** The ATV/motorized vehicle issue not going away but rather is increasing in intensity. People feel they are able to see places they would never be able to see without this transportation mode. I understand their feelings and desires, but I also understand that, as a person who prefers the tranquil, quiet experience that is afforded by restricting these vehicles to particular areas and the damage I've seen done by their unfettered travel, the BLM is in a unique position to plan effectively to meet the needs of all public land users. By carefully delineating areas where these vehicles can and cannot be used and employing strong enforcement – through presence, signage, volunteer involvement -- in those areas of greatest concern, the BLM can help get control of what might well become a completely unmanageable situation. Although I understand the position of the mechanized vehicle promoters, I also understand the damage they do to the land that includes destroying soils and allowing the invasion of species such as cheat grass. As a citizen of Washington County and, in fact, of the USA, I don't expect the government to enable my access to all areas if those areas are of some special concern. There needs to be education provided and actually required of all persons wanting to ride on BLM lands so they will understand the issues on those lands and the negative effects they might have. Perhaps tying vehicle licensing to the training might be a way of ensuring the proper training and knowledge is received. I believe that Selma Sierra, for Utah BLM director, was a great proponent of ATV use, herself being a rider. That is not a bad thing in and of itself unless that opinion translates into supporting riding anywhere and everywhere. I hope that Juan Palma, our new director, will have a more balanced view of the situation. Having attended a meeting of the RAC where they discussed the demands being placed on the ATV areas such as Little Sahara, it's apparent that the pressure is on to accommodate the demand and the BLM will be needing an excellent plan to manage the situation.

**Comment:** Potential wilderness areas in Washington county that are cited in the America's Red Rock Wilderness Area bill should formally studied for whether they meet WSA standards. Until this process is complete, the need careful protection from Off Road Vehicles.

**Comment:** Off-road vehicle (ORV) use is the greatest threat to wilderness values. I urge the BLM to restrict ORV use from the areas proposed in ARROWA. There is simply no need for further ORV routes in Utah. Over 74%-- 17 million out of 24 million acres—of public land in Utah is unprotected from ORV use, and there are over 100,000 miles of ORV routes in Utah. ORVs damage vegetation and disturb rare desert wildlife. They also destroy peaceful wilderness values for other users with their excessive noise and dust creation. ORVs can also disturb priceless archaeological or paleontological treasures yet to be inventoried and studied.

**Comment:** Water and Short Canyons on the south side of Canaan Mountain should be managed as non-motorized areas. These canyons are identified in ARROWA, and these delicate places are inappropriate for ORV use. The BLM should also close both of the routes that extend into the northeast corners of the Canaan Mountain wilderness and the Red Mountain wilderness areas because they are incompatible with the wilderness values of the areas.

**Comment:** If the BLM does decide to allow the use of damaging ORVs in the areas identified in Washington County for protection under ARROWA, I urge the BLM to identify manageable and clearly-marked ORV trailheads and routes to ensure that ORV use does not threaten the natural values of NCAs, wilderness areas, or other lands proposed for wilderness in ARROWA.

**Comment:** Let's protect the land by carefully regulating its recreational and commercial use; by setting aside the near pristine sections as wilderness areas; by not allowing commercial development in close proximity to national park boundaries; by placing environmental stability and protection above indiscriminate OHV use.

**Comment:** As a lone time 4wheeler I would like to see all existing trails in the St George area remain open. I'm sure this can be done with help from area 4 wheel, motor cycle and atv clubs pledge to police and maintain the trails.

**Comment:** I am against Off Road Vehicles as they are erosion causing noisy vehicles that injury many of their drivers, especially the young. Please limit the roads and areas these vehicles can go. People who enjoy the outdoors deserve to do that without the loud noises and the erosion that may never be repaired. Off road vehicles should only be allowed in limited places. I do not think they should be allowed on public land.

**Comment:** It is of utmost importance that the BLM protect the lands proposed for wilderness designation in ARROWA but not yet protected by Congress by restricting ORV use in these areas. ORVs have a significant impact on wilderness values and wildlife, and ORV routes fragment wildlife habitat and entire ecosystems.

**Comment:** At the top of our concerns are runaway off-road vehicle use that have, at times destroyed delicate features/soils and prehistoric rock art. You must get a handle on this overarching problem by only allowing appropriate and manageable off-road vehicle use that doesn't harm wildlife habitat, prehistoric sites and delicate soils/plants.

**Comment:** OHVs have a serious impact on wildlife values, especially those routes in riparian zones. Vehicles typically cross and re-cross a stream, creating many sources of siltation. Silt deposition takes a toll on aquatic species, which are the food source for many birds and mammals. Vehicles also destroy

vegetation in the riparian zone by flattening herbaceous plants, shrubs and small trees. Leaking engine fluids can poison the aquatic ecosystem.

The new plan should provide for restoration of damaged areas and closure of OHV routes where damage has occurred. Cross-country travel should be banned in all areas. The plan should bar OHVs from all routes that are not needed for specific public purposes identified in the plan. Multiple routes to the same destination, or routes that go nowhere, should be closed and reclaimed.

The "High Desert Off-Highway Vehicle Trail" established by PL 111-11 should be routed to keep vehicles strictly out of all riparian habitat and other valuable wildlife habitat and away from areas used for quiet recreational activities such as wildlife-watching, hiking, picnicking and camping.

The plan should make it easy for BLM to control OHV traffic by requiring OHVs to enter at designated sites, insofar as possible. At these designated entry points BLM can provide parking for trailers and restroom facilities. A fee may be charged to cover expenses, as is done at BLM's Little Sahara Recreation Area, a popular OHV area near Delta, Utah.

**Comment:** I don't think we need a road or trail on every mountain top or ridge, I don't want to lose any more of our precious riding areas or trails/roads. The number of people who use motorized recreation is only going to increase over time and smart management now is critical. Let's keep what we now have open to motorized travel. Remember if you use a "Loop System" of interconnected trails, people are less likely to go explore off the marked route. I believe we should add small sections of trail where needed to accomplish this. Marking of routes also helps in keeping folks from wandering off the legal route. Ask for help from clubs and other groups for trail construction, maintenance and marking, and you'd be surprised how many people would show up to volunteer. I don't believe in closing off access to public land to "save it" is a good idea. No one has ever explained who they're saving it for and what they are going to do with it later anyway.

**Comment:** Every summer when I go to areas I have enjoyed for years I have found more and more of the roads and access closed to camping, atv riding and other outdoor recreation. This needs to stop. Why restrict access to these areas to such a small percentage of the population? Many of the areas being closed down cannot be accessed by hiking. A person cannot physically carry enough water to hike in and out of these areas. To enjoy the beauty of these remote areas we need to maintain open roads and trails and go in with motorized equipment. What good is the area if we cannot access it?

**Comment:** I am an avid hiker and look forward to every trip to the wilderness lands of Utah. I have seen with my own eyes many instances of ATV's and trucks driving along dry stream beds or otherwise spoiling wilderness level lands.

**Comment:** I would to see as much protection as possible for such lands especially in view of the fact that off road vehicles seem to be everywhere. Once ruined, they cannot be restored.

**Comment:** I understand that people enjoy less passive recreation, such as ATVing in such places. I would ask that this be limited to protect the land and the wilderness experience for us and future generations.

**Comment:** I strongly urge you to limit /address (destructive) ORV's, expand ACECs & Wilderness Areas!

**Comment:** I frequently take my family atv riding, hiking, camping and exploring in many areas of southern Utah and Nevada. This is good clean family recreation and I want to see off road travel policy

kept as it currently is. No more public land access should be taken away from recreational off highway vehicle use by any means.

**Comment:** I can't speak to specific areas, but I do hope that BLM will carefully consider limiting ORV's in this area. I'm not saying they should not be allowed at all, but they do tear up habitat and create a lot of noise and disruption to areas that might be designated as quiet wilderness. Also I hope BLM will be careful about protecting water supplies in the area. People, animals, and plants need clean water to be healthy.

Please close roads that are redundant. Necessary roads must be kept, but we need quiet, natural areas for those who wish to enjoy them and to allow habitat for living and breeding for animals that live in these areas.

**Comment:** Please manage these new proposed wildlands appropriately so that they are not over run by ORVs and mining, and that they are left respected for their beauty - and for the fact that they stand as reminders of God.

**Comment:** My bigger concern, however, is ATV damage and intrusion. I think there's enough space for everyone to have their various fun -- camping, hiking, rockhounding, jeeping/ATVing, wilderness, mining, you name it. I don't want ATVs running all over the landscape, invading other peoples' fun (and damaging sensitive areas). Please study where their appropriate "playgrounds" and trails should be, give them plenty of space, keep them OUT of everywhere else, and ENFORCE these rules.

**Comment:** As a member of "Dunes and Trails ATV Club" in Las Vegas, responsible adult ATV rider and taxpayer, I strongly urge you to maintain the current level of usage available to ATV and OHV users. We care about the environment with the same passion that we care about our preferred form of recreation. I have found that a lot of people who say they are opposed to our sport are not involved in it nor do they care about seeing these areas for themselves whether on foot or by any other means. They have the preconceived notion that we're out there running down every creature and plant we come across. I realize that we have a few who disregard common sense rules but they are the extreme minority. I also recognize that certain areas do need protection from any form of traffic and support those areas. Before any more restrictions are put on "off-road users" I would suggest a meeting of representatives from the various user groups with BLM to form a common-sense plan of usage and perhaps form teams to periodically monitor these areas to insure their continued protection.

**Comment:** Please, manage for wilderness protection where possible and for maximum preservation everywhere else. Restrict vehicular access, off road use, protect critical species, and close roads.

**Comment:** In all possible cases, please eliminate ORV use.

**Comment:** I urge you to focus on restricting off-road vehicle use, which has already damaged many areas in the desert Southwest. It is time, I believe, for the BLM to promote conservation, preservation, and non-destructive recreation, particularly in beautiful areas with wilderness values such as the areas to be managed by the BLM in Washington County. Off-road vehicles should be prevented from entering areas proposed for wilderness designation in America's Red Rock Wilderness Act. As you surely know, ORV and their often irresponsible drivers regularly enter ecologically sensitive areas, such as streamside sites, and do irreparable harm there. Keep them out please. This applies particularly to Beaver Dam Wash NCA and Red Cliffs NCA.

**Comment:** In your evaluation process, PLEASE PROPOSE ACTIONS TO PROTECT THE SENSITIVE NATURE AND BEAUTY OF WASHINGTON COUNTY'S UNIQUE ECOLOGY. ORV's do not belong in this pristine area of natural beauty.

**Comment:** This is a great place where 3 areas come together to create a unique spot in Utah. The Colorado Plateau, The Great Basin and the Mojave Desert. We need strong protection in this sensitive area. You need to include strong wildlife protection and to address the problems with off road vehicles. ORV's cannot be allowed to just run where ever they want. They must be kept to established ORV roads.

**Comment:** It is essential that BLM craft strong plans worthy of the lands and resources the agency is charged with protecting, as they will set an important precedent for future plans as more of Utah's public lands are officially preserved as wilderness or NCAs.

It is important that BLM emphasize appropriate off-road vehicle routes, the need to protect wildlife and habitat, and suitable management decisions to protect the lands with wilderness character that were not included in the recent legislation.

**Comment:** One of the areas we have enjoyed is the lower Virgin River. Here, although one is quite close to civilization, you can have a wilderness experience. We bring our binoculars and enjoy the birds in this area. This area is unique for its scenery and wildlife. We find that this area is in danger of being permanently ruined by the motorized vehicles that frequent the lower Virgin. The landscape with its fragile desert plants is being torn up. We often encounter the noise and smell from ATVs. For these reasons we urge you to designate this area for non-motorized use only, to increase the current size which is now under the ACEC designation and to redesignate the whole area as a Special Recreation Management Area.

**Comment:** The Lower Virgin River ACEC should be expanded and also designated as an SRMA. It should be preserved for non-motorized recreation. First, I have been a four-wheeler in the past and enjoyed the sport responsibly by staying on developed trails and not destroying the land which the off road vehicle allowed me to enjoy. Most of the off road vehicle users are responsible, courteous, and respect the rules which protect our environment, however, there are the few (and that is all it takes) that feel that the thrill of 'testing' their machine and riding ability by going up steep hills in the process destroying plant life, (endangered or common) and permanently scarring the fragile desert land.

**Comment:** I do not support a northern or western corridor through Washington County. These areas need to remain scenic, unspoiled, and beautiful, due to the plant and animal habitats in these areas. I also do not support ATV and OHV development in these areas, or in any other public areas of the county. There are already more than enough roads and trails that these users have access to.

**Comment:** I support integrating the Vision Dixie Principles into your future land management plans. I do not support a highway through the beautiful Red Desert Reserve. As a hiker and biker, I am aware of much ATM and off-road abuse and would like to see more monitoring of this, and to establish areas that preserve a non-motorized experience. I support preserving our scenic areas and protecting our air and water quality.

**Comment:** The BLM needs to create a comprehensive OHV recreation plan! The BLM creates plans for conservation, energy exploration and species preservation. There are a million registered OHV's in UTAH and most of those recreate on federally managed land yet there is NO comprehensive OHV recreation plan.

**Comment:** I wish to express my concern for OHV access in southern Utah. Utah is a beautiful state, much of which is primarily accessible by OHV and Jeep-type vehicles. No further restrictions to access of State and Federal Lands should be considered. Those in violation of laws covering dumping or littering should be dealt with on a case by case basis. Any attempts to punish the majority for the crimes of a few will be met with a groundswell of political and legal activism. Also, attempts by the self-serving "environmentalist" groups to further restrict peoples access to our lands will also be met with swift legal and political action.

**Comment:** There should be more open areas for OHV use

**Comment:** It has come to my attention that the BLM will be closing public roads that lead to private property. That is completely wrong and terrible for the land owner. You all should be ashamed of yourselves. In this economy, when people are struggling to find entertainment that is inexpensive, you propose a plan that would take away their most viable option: public lands and all that they offer. Shame on you, BLM. How dare you?

Keep our public lands open. Period.

**Comment:** My wife and I have been avid outdoor advocates for many years. We hike extensively. Also, we enjoy four-wheeling, mountain biking, and motorized dirt-biking. Utah offers much in terms of our recreational preferences. However, many of the areas we have enjoyed for years have been closed (in terms of access) or are under threat of closure. This has been disappointing and frustrating.

Please do not change the access of current areas. We want all the current areas to remain open and without any additional restrictions or changes to access.

**Comment:** Leave our ATV trails open. This public land belongs to all the public, all the public.

**Comment:** Now to my main concern, travel plans across this great desert that we can all enjoy here in the Washington Co. area. I came to the area after retiring because of the opportunity for traveling the many dirt roads, trails and washes throughout this area and enjoying the past and present history of the area. I have explored many of them and there are many more to explore. I'm amazed every time I'm tooling down a wash or road and I see those brown markers showing things and places that someone says we shouldn't be going. Did someone just give some SUWA members a truck load of these and told them to use them up, and put them where ever they thought they wanted to put them. They are in washes that mother nature will alter when ever she decides to and the tracks will vanish. They are in the trails that have been used for decades and now someone wants to limit the trails available to use to travel. They are even in the middle of some roads that have been there for decades and longer. There are hand written signs that tell us to stay on the trial and in the washes. Other printed signs that asked us to stay on the trails in sensitive areas have been removed, why? The motorized population is growing every day and the more restrictions you put on travel the more beat up and degraded the trails you leave open will become. You don't need less trails you need more. On a lot of the weekends you have to really stay on your toes then traveling the trails to avoid a head on with another vehicle of some sort.

**Comment:** There needs to be competitive OHV tracks set up for use in the Southern Utah area. Also an OHV trail that ties into the Nevada silver state trail system

**Comment:** We have seen first-hand the rampant destruction from illegal and abusive ORV traffic. We have learned how ORV access facilitates the looting of native artifacts.

We implore the BLM to limit as much as possible ORV access. Wild public lands need to be protected and preserved for future generations to enjoy and for scientific study, not torn up by motorized thrill-riding.

Illegal ORV traffic will inevitably occur adjacent to ORV-permitted trails.

Some ORV riders are responsible and obey the law. But they are far outweighed by even a few illegal and abusive ORV riders, who ignore the impact of their vehicles on endangered habitats and fragile desert environments. Beside from the pollution from engine exhaust, they ignore the high-decibel noise, lingering clouds of choking dust, and muddied, destroyed streams they leave behind.

The BLM's budget is limited and enforcement is spread too thin. We have witnessed only one instance of ORV enforcement in all our years of exploring. The willful disregard of regulations by illegal and abusive ORV riders results in trail signs being defaced or destroyed, and there are even instances of large physical barriers being removed to enable illegal ORV access.

Without tough law enforcement, illegal ORV abuse will increase along with the permitted ORV traffic.

ORV traffic is not sustainable on fragile desert lands, and ORV access needs to be drastically limited or eliminated. Scarred public lands and destroyed wilderness should not be the legacy of the BLM.

**Comment:** Please do not lock up our public lands, but let ALL the public enjoy them. We believe in sharing the trails with access for all; there is plenty of room for us, AND nature, if we think rationally. As you know, there are extremist environmental groups that want to close it all down, but with millions of OHV's out there, if you lock people out, they are going to be riding where you do not want them to go. I have seen it happen, and the next thing you know, there are new tracks across the land that should not be there. I believe this abuse happens out of frustration from being shut out.

**Comment:** No OHV trails/roads/areas be closed without opening new trails/roads/areas in other places. This only makes sense. OHV use continues to increase in popularity in Utah all the while it seems OHV'ing areas are being closed (with no new areas being opened). This is crowding an ever increasing number of OHV users into an ever shrinking area of available/open land. We've reached critical mass! We can't continue on this path.

**Comment:** In any event, I would like to urge you to do your utmost to preserve what is left of the beauty and solitude of this area. In particular, limiting the access of the extremely noisy and destructive OHVs, as well as access by airborne motors (such as motorized gliders, helicopters, etc) is enormously important. There are huge numbers of existing trails already in place for OHVs. All they ever do is demand more, always more. They give no acknowledgment at all of the problems that their machines create for everybody else. Preserve some space for hikers, bikers, any non-destructive quiet sport, for Heaven's sake. And for Utah's sake.

**Comment:** My preference for managing public land is to close travel routes to motorized vehicles.

**Comment:** I oppose adding more roads or allowing ORV riders more access to BLM land. I find that SUWA represents my views in every respect as regards to protection of public lands.

**Comment:** Please consider keeping open any OHV areas and trails that have in the past been utilized by full-sized 4WD vehicles as you finalize your plan for this area. The 4WD community appreciates your efforts to meet the demands of many different user groups, and I believe has in the last few years become much more involved in recreating in sustainable ways on public lands. It is possible that jeep and other

4WD clubs actually do more to clean up and maintain the areas where they recreate than many of the other user groups who share those areas with us. All the clubs I've belonged to spend multiple man-hours picking up trash at trailheads, campsites, and on the trails they use, as well as working closely with their local BLM and Forest Service representatives to put up/repair signs, trail markings, and help with clearing debris and fallen trees, etc. from trails. Closing recreation areas to 4WD enthusiasts makes it harder for many families to enjoy the outdoors together and increases the risk of disgruntled individuals creating new illegal trails that could cause more harm to the environment than the maintained trails that exist now.

**Comment:** I am writing to urge the BLM to devise appropriate off-road vehicle routes. While I recognize that BLM lands are for multiple use, and that OHVs have recreational value, it is important to recognize that off-road vehicle use and oil and gas drilling and other intensive uses are incompatible with less intensive uses, such as the search for solitude, peace and quiet, or quality wildlife habitat. Simply put, off-road vehicles are loud, and they tear up the fragile desert topsoil, an impact with several indirect impacts such as lower water quality, lower air quality, and increased albedo on the snow pack in Colorado. The loud motors disturb wildlife, reducing the quality of wildlife habitat. In an age of climate change, it makes no sense to have a resource management plans that prioritizes obtaining and burning more carbon fuel. Please move us to the next step of resource management. One that recognizes the dire situation in which we currently sit. We have no choice but to reduce address climate change quickly and immediately. The amended resource management plan and the associated EIS should recognize this imperative shift in priorities.

**Comment:** My family and I have had the opportunity to visit the St. George area the past few years for recreational offroading. We are very active in the off-road world and spend about 20-30 days per year on fairly hardcore two track trails around the state. This is in addition to 10-20 days of other outdoor activities such as camping/hunting/fishing/etc. The trails we use most would be classified as "primitive" to the BLM. We started off roading as I'm somewhat handicapped and unable to hike very far due to questionable knees and younger children. We've had the opportunity to drive the Maze, Jon's Trail, Warner Valley, Milt's Mile and SlipLock Gulch. There a number of other trails that are documented from the locals in the area and we would love the opportunity to drive and hope they are included in the trail inventory. We seek these types of roads out for a number of reasons, but one of them is that it's a bit of an adrenalin rush to conquer the primitive trails.

As I'm sure you've read, our group believes we have impressive economic impact for events. The main purpose of organized events is to show land stewardship and promote Tread Lightly type of attitudes in less experienced off-roaders. My kids have grown up planting seedling pines, collecting various shot up appliances and always picking up trash on any trails that we are on. I'm proud of how my kids have started to take ownership and responsibility while on the trail. I believe this was taught to my children through example of other dedicated trail users from around the state.

I apologize for not having documented via GPS or similar the trail routes and hope the ones mentioned are in your inventory. I'd also hope that any other areas of interest could be developed with the aid/cooperation of the BLM so that each special interest group could have the items they seek in public land. I believe Senator Bennett's best legislation was the land use compromise near St. George and would expect that kind of spirit from this inventory. I do respect other user groups and believe they have the right to recreate how they see fit, but not at my expense. We do offer assistance or cooperation to any other land users we run across and seem to be able to help some users.

I respect what parameters you have work to within and believe you will make the correct choices for the sensitive areas and allow other types of uses in less sensitive areas. We will support the BLM in their decisions and would offer our services to help mark trails and do other maintenance work.

**Comment:** Last March I had the pleasure of attending the Tri State Jamboree in Hurricane. What a wonderful experience. I am 73 and my wife is 70 with Alzheimer's. Our Polaris RZR is one of the few recreation pleasures we have. The trails and scenery in Utah are second to none. Please do not place additional restrictions on our ability to enjoy your wonderful state.

**Comment:** We ask that you support OHV Recreation in Utah

**Comment:** We would strongly encourage you to pursue hiring a motorized recreational specialist who has a background in Off Highway Motorized Use and perhaps enjoys and even owns an off-highway vehicle

**Comment:** The Red Cliffs Desert Reserve (RCDR) was set aside as mitigation to offset development of 12,264 acres of tortoise habitat and take of 1,169 desert tortoises. The main goal of the RCDR is to maintain a viable population of tortoises. The Washington County Habitat Conservation Plan specifically states that, within the RCDR, uses will be carefully controlled and all management actions will place the desert tortoise as the highest priority. The Division of Wildlife Resources encourages the BLM to continue to place the protection of the desert tortoise and its habitat as the highest priority throughout this planning process. To accomplish this goal, the Division of Wildlife Resources suggests the following actions:

1. Continue to limit recreation use to designated trails within the lowland zone in order to minimize degradation and loss of tortoise habitat.
2. Continue the enforcement of recreation restrictions that protect the RCDR.
3. Continue to limit OHV travel to designated roads within the National Conservation Areas.
4. Encourage grazing practices that prevent further tortoise habitat degradation with the NCAs. The Division of Wildlife Resources notes that the tortoises have lost a substantial portion of their habitat due to recent wildfires and dominance of invasive species within the areas.

**Comment:** To limit the consequences of ORV users riding off of designated routes, BLM must significantly limit ORV routes in sensitive wildlife habitat, in areas where cultural resources are present, and in areas where BLM has identified wilderness characteristics.

**Comment:** Stop reducing Motorized Off-Highway Vehicle opportunities, you keep pushing us in smaller and smaller areas. The quality of the trail is important not just the mileage.

**Comment:** Alternatives for these NCAs should include No Livestock Grazing and No ATV/Dirt Bikes.

**Comment:** For non-NCA areas, Alternatives should also include significantly reduced livestock grazing and significantly reduced ATV/Dirt Bike access. Voluntary permit buyouts should be allowed to reduce livestock grazing.

**Comment:** BLM must address safety and noise effects to non-motorized users and wildlife.

**Comment:** BLM should analyze the direct, indirect and cumulative effects of the RA's road and trail network, closed roads and trails that continue to be used illegally by ATVs and dirt bikes, and the incidence of newly created, illegal routes.

**Comment:** ATV trails bring noise and dust. They should be kept to a minimum and away from parks and wilderness areas.

**Comment:** I spent a week backpacking in the Mt Caanan Wilderness recently and was really upset to find ATV and jeep incursions throughout. In one case, they had driven up a small waterfall leaving tread marks. Our group consisted of seven of us from six different states. We chose the Mt Caanan Wilderness because we assumed that it was new and not as popular as other wilderness areas and that it would be quieter and more secluded. We heard AW noise on three different occasions. When we spoke to someone afterwards about it, their response was that the local BLM refuses to enforce any regulations.

I hope that this is not truly the case. Wilderness areas belong to all Americans not a few locals, and as such, it should be protected and regulated as intended.

**Comment:** Please designate these trailheads and routes with priority given to protecting the archeological areas - which should be inventoried - and the NCAs, wilderness and proposed wilderness areas.

**Comment:** CDF urges BLM to use science to designate trails and adopt these BMPs as guidelines and standards as a solution to challenges of how to manage areas and trails which would improve conditions and reduce risks to important natural areas, they include:

1. Close all unauthorized and/ or illegal routes and restore the land. When possible, recover the site with native species, vertical mulch or convert to non-motorized single track if appropriate.
2. Close routes that have a history of unsuccessful enforcement of unauthorized off-road vehicle activity along or adjacent to the route, and associated resource damage.
3. Avoid creating loop routes where so doing would open up large acreages to potential ORV impacts, legitimize unauthorized routes, or isolate wildlife habitat within interior loops.
4. Reclaim administrative routes once the administrative purpose ends
5. Require all motorized camping to occur in designated campsites. Reclaim unauthorized motorized camping sites.
6. Close routes that serve no needed, discrete purpose, have no definable destination (i.e. "cherry stemmed" routes in road less areas) or are duplicative. It is the obligation of those promoting designation of a route to show that there is a public need that cannot be met by other routes or by other access means.

**Comment:** Map 2 - 1. Sand Hollow OHV - remain open

**Comment:** Ash Creek - OHV open (Gunlock)

**Comment:** I hope that all the areas possible are left open and accessible to the public.

**Comment:** Map #1 dated 6/14/10 - We spend a lot of time on the presently designated ones in the Sand Mountain and Little Creek areas - we hope they stay open as well as the other trails in the area for jeep travel. ATV's seem to be the ones tearing up the country.

**Comment:** I am opposed to any open access for ORV's, all trails should be limited access only. I don't believe we need any more trails, but any future trails designated should only have limited access.

**Comment:** We should keep all roads open of the OHA of Gun lock & Sand Ridge open.

**Comment:** Keep all horse areas open in Red Cliff, Red Mountain, Cottonwood Canyon & Leeds Area.

**Comment:** Leave Sand Mtn. open OHV: extend Warner Valley to state line. Grafton Mesa wood trail.

**Comment:** I consider it a travesty to close down motorized access to Canaan Mtn. This is one of the most beautiful places on the planet and now most folks will not be able to enjoy it. Only a handful of able-bodied hikers will go to this area. This is a shame and should be reconsidered by Congress.

**Comment:** Silver Reef area should remain open to travel on designated roads/trails. This is a great area to explore with awesome Utah mining history. Grafton & Wire Mesa area is great to explore with the family. I'd hope that whole surrounding area of Canaan Mtn. remains open.

**Comment:** Ash Creek is frequently used, area by Gunlock called the Squeeze and area by LaVerkin Falls.

**Comment:** Sand Hollow area is great being open. Know all areas can be open but trail systems would be great.

**Comment:** NCA area Beaver Dam - All the roads seem to be closed - not right. There are lots of roads & trails no longer open. Warner Valley open OHV to the State line.

**Comment:** Our search & rescue team will take anyone on trails to GPS.

**Comment:** The management of Sand Hollow left to the BLM. Extend open OHV in Warner Valley excluding dinosaur tracks to the border. Grafton Mesa historic wood road is designated a primitive road on map, from cemetery up mesa. Keep open for OHV's for access to mesa. Little Creek Mtn. has trails and bike routes/OHV extending in all directions, concerns of archaeological are being pillaged and destroyed. BLM primitive campground is a problem area with human waste, etc. Possible improvements to area.

**Comment:** As far as the Beaver Dam Wash being closed from ATV use - I would comment it should be left open. Reason being floods take tracks out and you don't have lasting tracks.

**Comment:** RET on Inventory Map; also, see maps attached to hardcopy comment. 08 - The trail known as 'the squeeze" on the Gunlock open OHV area (as id'd by the Utah 4x4 club) should be added to the inventory.

**Comment:** RET on Inventory Map; also, see maps attached to hardcopy comment. 10 - The following routes within the Sand Hollow open OHV area as identified by the Utah 4x4 club should be included in the inventory: Fault Line, West Rim, Milt's Mile, John's Trail, and Slip Lock Gulch.

**Comment:** 1. Sand Mountain Open OHV Area

Although our most favorite riding is exploring the area on designated routes, we have ridden and enjoyed the Sand Mountain area on a few occasions and find it to be a great opportunity play on the sand. We would strongly encourage that this area remain designated open. We believe the best way to manage this area, including the Hurricane sand dunes, is to leave it under BLM administration and not Sand Hollow State Park. We feel that it would discourage users to have to pay a fee to enter the area. We would also suggest that the open OHV area be extended around Warner Valley to the state line. The BLM should complete and administer staging areas in the open OHV area in Warner Valley

**Comment:** Gunlock Open OHV Area

We have ridden in the Gunlock / Goldstrike area and look forward to future opportunities to return and explore some more. We strongly support keeping the Open OHV designation in that area as open. There are very few areas left on BLM lands that have the open designation and we do not want to lose any of what we still have. Under any circumstances we want to see all of the existing roads in this area left open. There are trails in this area known locally as "The Squeeze" along with connector routes. We support Utah 4x4 Club's position on this trail with the data they have submitted. These trails need to remain open for motorized use.

**Comment:** Having observed the destruction of large areas of desert by ATVs, dirt bikes and other off-highway vehicles, it is obvious that their use should be generally limited to existing roads and trails. The dust, soil erosion, habitat destruction, noise, litter, and visual degradation accompanying unlimited off-highway access are all too apparent in this region. The only open access areas should be in designated OHV "parks" with definite boundaries, such as the one known as "the staging area" near Washington Dam, or the dunes on Sand Mountain. Outside of such designated areas there should be NO open cross country areas when OHVs are free to roam. I enjoy traveling unpaved backcountry roads in my Jeep. But, I stay on the roads. That should be the rule for everyone.

**Comment:** Improvement of Non-Motorized Trail System with the NCA. The non-motorized recreational opportunities within the Red Cliffs NCA are outstanding and unique. These trails need to be designed and managed to provide for recreational use that is compatible with habitat protection. When the trail system was initially developed during the Public Use Plan planning process, a collaborative team worked diligently to find a reasonable balance between access and habitat protection. This trail system generally has withstood the test of time but for a few areas in need of improvement.

The biggest issue we see is user compliance with the trails system and the increasing issue of off trail travel and unauthorized trail development in the Lowland Zone, causing habitat degradation. Part of the solution is to slightly expand and modify the trail system in key areas, such as Paradise Canyon and the Grapevine/Cottonwood/Red Cliffs area. A few carefully placed, well designed linkages and trails will help create short, moderate, and longer length loops from popular trailheads that satisfy all user groups. Providing these loops will help to improve user compliance with the requirement to stay on designated trails within this Zone.

Other factors that exacerbate the proliferation of off-trail use is the lack of adequate signage, public education/outreach, and law enforcement. These management needs must be addressed and adequately funded. There also needs to be adequate funding resources available for restoration of closed and illegal trails to discourage future use. An increase in trail development in the Upland Zone may indicate the need for a mechanism to approve, develop, and designate additional trails. While off-trail travel is allowed in this Zone for equestrians and hikers, it was never intended that this would enable the proliferation of user-created trails. Trails systems need to be planned and thoughtfully located.

**Comment:** Please formulate preferred alternatives that allow a reasonable amount of trails and not just roads. Please do not formulate plans that have a bias towards restrictions and closures, I know that there are local clubs that are giving specific input as to what would be the most suitable route system and I asking you to please consider their input. The St. George area currently offers world class recreation opportunities that should be preserved through a reasonable amount of motorized access.

**Comment:** Washington County OHV Map

We feel that all routes that are on the Washington County Travel map produced by Utah State Parks and Recreation should remain open to OHV travel.

**Comment:** Roads in the Beaver Dam should be limited to minimize their impact on the NCA areas.

**Comment:** Restrict ORV use in the lands proposed for wilderness designation but not yet protected by congress.

Conduct a wilderness inventory of the lands proposed for wilderness designation in the America's Red Rock Wilderness Act.

**Comment:** I live in Washington County and am glad to have this natural habitat so close to my home. However, I am concerned with the frequent ATVs driving around, gunshots in signs, and for my safety when I am alone hiking in this area. Why does this area need to be developed further? Shouldn't we have ANY lands that can remain as they are???

Why can't the natural wildlife habitat continue to roam freely in this area? My idea of the BLM is to protect the public lands – not waste them. Why can't there be “primitive zones” in areas to restrict off-road vehicle travel, protect sensitive species, and ensure that these areas retain their wilderness character? I also don't think these lands should be available for grazing cows and more pollution from methane gases. We don't need any more roads in these areas. The ones that already exist should remain primitive. Have you ever been out to Canyon lands or Arches or Death Valley? These are by far the best of the national parks because they have remained “rather” undeveloped (unlike the South Rim of the Grand Canyon and Yosemite Valley). Here in southern Utah, I like so many other people, came to escape the city. Do not ruin these public lands for people like us who use them with no impact.

I support conservation of Beaver Dam Wash and Red Cliffs NCAs to protect the sensitive, plants, animals and other resources in Washington County.

**Comment:** We often ride in the Hurricane Sand Dunes area. We are very interested in having this area accessible for riding for years to come. We are opposed to the creation of ACECs in any areas. We also prefer to have the areas in question continue to be managed by the BLM and not the state parks such as Sand Hollow State Park.

**Comment:** The BLM should protect the lands proposed for wilderness designation in ARRWA but not yet protected by Congress by restricting Off Road Vehicle (ORV) use in these areas. ORVs have a significant impact on wilderness values and wildlife, and ORV routes fragment wildlife habitat and entire ecosystems. Please identify manageable off-road vehicle trailheads to ensure that ORV use does not impact the NCAs, wilderness areas, or other lands proposed for wilderness in ARRWA. In particular, the BLM should close redundant, unnecessary, and ecologically damaging routes within the Beaver Dam Wash and Red Cliffs NCAs in order to protect the multitude of sensitive plant and animal species there, including the desert tortoise. All vehicle routes designated within the NCAs should serve the conservation-focused purpose and need of the NCAs and minimize impacts to resources as required by law.

**Comment:** Potential wilderness areas in Washington county that are cited in the America's Red Rock Wilderness Area bill should formally studied for whether they meet WSA standards. Until this process is complete, the need careful protection from Off Road Vehicles.

**Comment:** Off-road vehicle (ORV) use is the greatest threat to wilderness values. I urge the BLM to restrict ORV use from the areas proposed in ARRWA. There is simply no need for further ORV routes in

Utah. Over 74%-- 17 million out of 24 million acres—of public land in Utah is unprotected from ORV use, and there are over 100,000 miles of ORV routes in Utah. ORVs damage vegetation and disturb rare desert wildlife. They also destroy peaceful wilderness values for other users with their excessive noise and dust creation. ORVs can also disturb priceless archaeological or paleontological treasures yet to be inventoried and studied.

**Comment:** As a lone time 4wheeler I would like to see all existing trails in the St George area remain open. I'm sure this can be done with help from area 4 wheel, motor cycle and atv clubs pledge to police and maintain the trails.

**Comment:** These are some of the areas I marked on the map you had at Salt Lake City. Just to emphasize and remind. These areas are important to the sport of four wheeling which in turn brings in money to the various government agencies and businesses in these areas. Can not understand why they need to be closed after being in use for so many years. KEEP THESE AREAS OPEN Ash Creek Babylon Area Canaan Mtn. China Town Gunlock Open OHV Area High Desert ATV Trail Sand Mountain Open OHV Area ( Kyle Voyles-I could not find that trail that goes across SITLA land (West to East) thru the bad lands to Sand Mountain but I know it is there.)

**Comment:** I ask that you give high priority to keeping existing OHV routes and “open areas” open. I know that the St. George Field Office has had a good relationship with the local Jeep and OHV clubs in the past, and I fully support their efforts and ideas in regards to the Travel Plan.

**Comment:** I am against Off Road Vehicles as they are erosion causing noisy vehicles that injury many of their drivers, especially the young. Please limit the roads and areas these vehicles can go. People who enjoy the outdoors deserve to do that without the loud noises and the erosion that may never be repaired. Off road vehicles should only be allowed in limited places. I do not think they should be allowed on public land.

**Comment:** I don't think we need a road or trail on every mountain top or ridge, I don't want to loose any more of our precious riding areas or trails/roads. The number of people who use motorized recreation is only going to increase over time and smart management now is critical. Lets keep what we now have open to motorized travel. Remember if you use a "Loop System " of interconnected trails, people are less likely to go explore off the marked route. I believe we should add small sections of trail where needed to accomplish this. Marking of routes also helps in keeping folks from wandering off the legal route. Ask for help from clubs and other groups for trail construction, maintenance and marking, and you'd be surprised how many people would show up to volunteer. I don't believe in closing off access to public land to "save it" is a good idea. No one has ever explained who they're saving it for and what they are going to do with it later anyway.

**Comment:** Please leave Sand Mountain, gunlock, High desert atv trail, and ash creek open. These areas need to be left as is without further restrictions and open to current vehicle designations.

**Comment:** The Sand Mountain area including the Sand Hollow State Park has become very popular destination location with motorized recreation users. I would recommend that the “open to cross-country travel” designation that includes Sand Mountain be preserved and expanded to include the area south of the Warner Valley road to the Arizona State line. This would make management in this area easier for BLM and would cause less confusion and frustration for current users in the area.

**Comment:** Over the last 15 years with the completion of the RMP for Washington County in 1999, the Washington County Growth and Conservation Act of 2008, the Arizona Strip RMP, the designation of the Parashant National Monument, and the closure of Utah State lands in the South Block, motorized

recreation opportunities in and around Washington county have been severely curtailed or restricted. At the same time, there is more competition among users for the reduced number of available recreation opportunities. This has created a huge amount of frustration and resentment. I would recommend that this situation could be helped by proactively developing motorized recreation areas within the field office area as described in items 8 and 9 below).

The first area to consider would be the currently “open” area west of Gunlock. This area was pointed out on the Hurricane Map #2 by the initials DG. The area topography is rugged and lends itself to limited off-route travel. I would recommend BLM plan for, design, and construct a series of single-track and ATV routes that would have a higher than average difficulty rating to supplement the system of two-track roads that currently exist in the area. This would allow for the more “aggressive” type users to have a place to go that they do not have at present. The area has already been impacted extensively by mining activities and several good loop opportunities could be created. Involving motorized users to help in this effort would also be recommended.

The second area to consider as a “planned” destination motorized recreation area would be the east half of Little Creek Mountain. Much of this area has been extensively impacted by the chaining of the Cedar and Juniper trees and routes for wood gathering and does not lend itself to off-route travel. This area has enough topography to allow for the creation of a motorized recreation area for the east side of the county. Recommended routes to be planned for and constructed would be ATV routes that would supplement the existing two-track routes. The west side of the Little Creek Mountain has an extensive system of “illegal” mountain bike trails that will certainly be asked to be included in the new management plan. If those routes are allowed to be designated, it would only be equitable to create a corresponding area for motorized recreation.

**Comment:** In mountain biking there are certain areas where the terrain is everything. In Utah we have some of the best terrain on earth, it is specifically called Slick rock. In Washington County we have a shortage of slick rock in comparison to Moab. But, we do have slick rock, it is found on a particular geological formation called the Shinarump. This formation is made up of a hard conglomerate and caps many of the mesas in the area. Mesas such as Gooseberry, Little Creek, Upper Dalton Wash, and Rockville Bench are all capped with this hard conglomerate. It is often weathered and rough, but can also be smooth and perfect for a natural hard bike riding surface. Because the area is limited in this particular kind of rock, and limited in areas where this rock has weathered in a specific way to accommodate the Mountain Biker, I would like to recommend these areas be reserved and developed for Mountain Biking. These areas include: Gooseberry Mesa, Little Creek Mountain, the Mesa above Dalton Wash (Guacamole Trail), and Rockville Bench (Slick Rock Swamp Trail).

I also support the other types of trails and terrain but am somewhat partial to the slick rock experience.

**Comment:** The sand mountain open area needs to stay under BLM control and expand. The gunlock open area needs to expand also and include competitive events.

**Comment:** Please do not close, or limit to non-public administrative use only, the routes in the Designated Road area of the Beaver Dam Wash NCA. Designated motorized trails do not threaten any species. No cases of species loss has been verified.

**Comment:** Santa Clara Reserve:

My in-laws live in Ivins so when Q and I would come and stay for a couple of days it was great to be able to hop on the bike and ride over to get some fun single track loops in. The views are great of Red mountain and other surrounding mountains. It is so nice to have something so close that in 10 to 15

minutes you can feel like you are out of town and enjoy the falcons flying overhead and unobstructed views. Anytime you can create open space around a large community or a growing area it's always a plus in my book for the quality of life.

#### Red Bluff:

This area is the first area I rode in St George. It is a great area because it has something for every level of rider. Being right in the middle of everything it is a great location for locals to be able to get out and recreate, whether they need a quick ride or a long ride. I really enjoyed doing the big loop Stucki and then adding some technical stuff by the Green Valley Spa before heading back down to the Bloomington side.

However I must say that I was a bit frustrated when I would see that motor cycles and ATV's had been on the back side of Stucki and tore it all up widening the trail tread and making me pissed instead of having a peaceful ride. The Bear Claw Poppy trail has seen a lot of widening due to novice use and this trail probably should be a bit wider, because novices have a hard time staying on skinny single track. I really think St George needs this area to be protected in SRMA it is very value- able open space for the quality of life in this area.

#### Hurricane Rim:

The Hurricane Rim is dear to my heart because I was involved in building and designing part of it. I love putting together the JEM, Gould's, and the Hurricane Rim for a big loop it gives me a little bit of everything with unobstructed views and falcons flying over head. And the wild flowers in spring are incredible, who knew those bushes could produce such pretty flowers. With Hurricane being a growing community it is nice to be able to have this open space so close that you can ride from your house and be on such an incredible trail system. This area also provides something for every rider from novice to advanced.

I have also come across ATV tracks out on this area in places they should not be which is always gut wrenching to see especially when you are trying so hard to keep the trail tread narrow and as unintrusive as possible and have built them by hand, not with a machine.

#### Greater Gooseberry:

This area of course is world class with all the incredible views of Zion and the surrounding areas. Who doesn't enjoy Gooseberry the white trail for novices to start on and build from there. This is by far one of my favorite places to ride. This place is great because no matter how skilled you are it can still challenge you especially if your caught looking at one of the great views while trying to ride. This is a place where you go and spend all day stop take in the view and have some lunch. This area is also a great area for the local economy and needs to be protected from structure development for the views, single track and the experience.

Also on the west side of Gooseberry the trail connecting into Grafton Mesa I have to say is spectacular with views and its a single track trail that a novice can ride and get a taste for Gooseberry. Also the idea of linking the riding areas really makes sense to me for the individuals that want to get in some long epic rides.

#### Little Creek:

What can I say this area is incredible all the way around, with great views, riding for all levels of riders, amazing landscape and of course all the amazing history. This area is supper high on my priority list to

protect and make sure that it is managed properly. When I ride in this area I feel like I am going back in time to a great civilization and ride in this area with the utmost respect.

I have seen plenty of ATV tracks out there in different place and do not appreciate it.

One other thing I would like to comment on is shared use among non-motorized groups on the same trail which I think can be a great idea. Where you have to be real careful is mixing horses and bikes. (I do own horses, they were my first love) Trails that have lots of slick rock on them, fast descents, with blind turns, and soils that will not hold up to horses tromping and churning them to thick sand pits. Sand pits create an unpleasant experience for a biker. As well you need to clear trail through trees wider and higher which makes the riding experience different for a rider on a bike. Horse riders and bikers are looking for different experiences when it comes to trail corridor. Horses need more head room and width so that a horse riders head doesn't get taken off, or there legs. Bikers like to dodge, duck and weave through the trees. Bike riders have to stick to the trail tread they are limited in where they can go, they can not just go across country. A horse can step over and go around and is not stuck to the trail tread. While I think that horses can definitely be in the same area as bikes, but not necessarily on the same trail

In closing I would like to endorse the 5 SRMA areas that the Dixie Mountain bike Association are proposing and sum up what is important to me in a riding area. I look for great views, fresh air, wildlife, single track, challenging technical trails, fast flowy trails, and being able to ride from where I am staying.

**Comment:** I wish to express my concern for OHV access in southern Utah. Utah is a beautiful state, much of which is primarily accessible by OHV and Jeep-type vehicles. No further restrictions to access of State and Federal Lands should be considered. Those in violation of laws covering dumping or littering should be dealt with on a case by case basis. Any attempts to punish the majority for the crimes of a few will be met with a groundswell of political and legal activism. Also, attempts by the self-serving "environmentalist" groups to further restrict peoples access to our lands will also be met with swift legal and political action.

**Comment:** It has come to my attention that the BLM will be closing public roads that lead to private property. That is completely wrong and terrible for the land owner. You all should be ashamed of yourselves. In this economy, when people are struggling to find entertainment that is inexpensive, you propose a plan that would take away their most viable option: public lands and all that they offer. Shame on you, BLM. How dare you?

Keep our public lands open. Period.

**Comment:** My wife and I have been avid outdoor advocates for many years. We hike extensively. Also, we enjoy four-wheeling, mountain biking, and motorized dirt-biking. Utah offers much in terms of our recreational preferences. However, many of the areas we have enjoyed for years have been closed (in terms of access) or are under threat of closure. This has been disappointing and frustrating.

Please do not change the access of current areas. We want all the current areas to remain open and without any additional restrictions or changes to access.

**Comment:** I truly hope that as a new management plan is drafted, it will not restrict access to existing roads and trails or eliminate areas designated as "Open". Please respect the wishes of local residents that use their public lands, more that the wishes of high paid lobby groups that will never see the lands they wish to control.

**Comment:** An area about a mile south of Gunlock Dam, a wash going west from the Santa Clara River, the canyon mouth is in the NW 1/4 sect.8,T 41S,R 17W.- ATV's and dirt bikes are badly tearing up the lower end of this scenic canyon for half a mile, not staying in the wash bottom but running up the sides, tearing up the vegetation and causing erosion. The user caused access into this canyon should be closed to stop this. The access point is only 10 feet wide and could easily be physically closed to ATV,s and other motorized vehicles in the name of resource preservation. This makes an excellent hike up the wash into a scenic canyon. I have turned in to BLM pictures of the damage and coords of the wash mouth.

**Comment:** Please keep existing trails and roads open to the public for off-highway vehicle use. We love exploring all the natural and historic places in the area on our ATV's with the family, which is also a preferred method for older and handicapped persons, which we are.

**Comment:** BRC supports the retention of the “Open” designation across Alternatives.

BRC supports the OHV “Open” area of the Sand Mountain Special Recreation Management Area under all alternatives. This is consistent with the agreement for joint management by the State of Utah’s Sand Hollow Reservoir State Park.

BLM should consider other areas where small Open area designations are suitable. For example, staging areas are sometimes appropriate for the Open designation. “Tot Lots” where children and young adults can recreate with their friends in an area close to parental supervision are highly valued. Some OHV events, such as motorcycle trials competitions, require the “open” designation to be viable. The SGFO has several areas where trails events could be held with little or no environmental impact. At least one alternative should include designating a trials competition area similar to the one at 3-Peaks.

**Comment:** Keep the private property, mine property, travel access; and current status quo, "open" designation in the: Hamburg Peak, Jackson Peak, Jackson Gulch, McFarlane Mountain, Mineral Mountain, Butcher Knife Canyon, Dagget Flat, Miners Canyon, East Fork Beaver Dam Wash, Quail Spring, Goldstrike, Square Top Mountain, area -- under all alternatives of the travel plan amendment. Motorized recreation, private property and mining must be “open” and protected in the amended plan.

The Bureau of Land Management (BLM) scoping mandate of P.L. 111-11., Subtitle "O", of the Omnibus Public Land Management Act of 2009; and specifically the Comprehensive Travel and Transportation Plan of the St. George Field Office, in Washington County.

Congress specifically stipulates the following in the law; “enhanced recreation and general opportunities”. This law was passed by a Democratic Congress and president.

Washington County has Zion National Park that is federally protected from motorized recreation; two new National Conservation Area’s in Beaver Dam Wash and Red Cliff’s federally protected, 14 additions of wilderness areas federally protected and prohibitive to motorized use. Nationally, the federal government owns about 650 million acres. The BLM manages about 255 million acres. There must be “open” opportunities for motorized recreation on the west side of Washington County. Multiple-use and motorized recreation is also a policy perspective and objective of the BLM to manage the federal lands. We believe that an “open” designation under all alternatives would significantly reduce conflicts in the area.

**Comment:** Consider the nearly 30 “open” designations by the BLM in Iron County north of Washington County, it is certainly reasonable to have the last two “open” areas in Washington County to add and comply with the congressional travel mandate of, “enhanced opportunities” in the county.

Congress mandated the travel plan amendment to, “designate a system of areas, roads, and trails for mechanical and motorized use.” This also includes “open” areas to be included in a system of trails; not just limited or restricted. The only two “open” designations meet the congressional requirements of the law too, “...shall only include trails that are –as of the date of enactment of this Act, authorized for use by off-highway vehicles.” Refer to the December 2002, Interagency Recreation Travel Map in the Utah, Cedar City/St. George map in complying with the congressional mandate.

**Comment:** 1. Sand Mountain Open OHV Area

Although our most favorite riding is exploring the area on designated routes, we have ridden and enjoyed the Sand Mountain area on a few occasions and find it to be a great opportunity play on the sand. We would strongly encourage that this area remain designated open. We believe the best way to manage this area, including the Hurricane sand dunes, is to leave it under BLM administration and not Sand Hollow State Park. We feel that it would discourage users to have to pay a fee to enter the area. We would also suggest that the open OHV area be extended around Warner Valley to the state line. The BLM should complete and administer staging areas in the open OHV area in Warner Valley.

2. Gunlock Open OHV Area

We have ridden in the Gunlock / Goldstrike area and look forward to future opportunities to return and explore some more. We strongly support keeping the Open OHV designation in that area as open. There are very few areas left on BLM lands that have the open designation and we do not want to lose any of what we still have. Under any circumstances we want to see all of the existing roads in this area left open. There are trails in this area known locally as "The Squeeze" along with connector routes. We support Utah4x4 Club's position on this trail with the data they have submitted. These trails need to remain open for motorized use.

**Comment:** 1. Sand Mountain Open OHV Area

My understating is that this area will remain designated open. The best way to manage this area, including the Hurricane sand dunes, is to leave it under BLM administration and not Utah State Park. There involvement in management should be limited. We do not want to have to pay a fee to enter the area. I would also like to see the clubs and local communities to be involved in construction and management of staging areas accessing this area. I believe that the Open area should extend to the Utah Arizona state line and across to the St George side of Warner Valley. There are many areas in Warner Valley that could be improved to be used as staging or camping areas in toy haulers and travel trailers. The dinosaur tracks have be protected and offer a look into the past with lots of visitors each year. A sign in sheet such as offered at the Black Rock petroglyphs could be offered as well as a picnic area. Manage this area with pro active and community involvement. Many local communities benefit from the popularity of this area. They will be impacted the most by changing the current management practice. Please include them in future decision's in management practices.

2. Gunlock Open OHV Area

I strongly support keeping this area as open. If not left as an open area I would like to see all of the existing roads in this area designated as open. There are trails in this area known locally as "The Squeeze" along with connector routes. I support Utah 4x4 Club's position on this trail with the data they have submitted. These trails need to remain open for motorized use. This group is a solid active group who promote responsible use of public lands.

**Comment:** Please keep all areas open to horses.

**Comment:** Map #3 - 3 areas designated with serious ATV problems. Cultural resources present in at least two of these areas. Milkvetch present in one.

**Comment:** Map 2 - Gunlock OHV open area remain open: Map 2 - Sand Mountain Hollow OHV remain open

**Comment:** Larger areas closed to ATV use are needed. Areas where ATV engines can't be heard. Areas set aside for hiking trails & horse & mtn. bikes. The Red Cliffs Reserve gives a good start for such areas. The popularity of the reserve shows how important these non-motorized areas are and how much we need them.

**Comment:** Map 2 6/14/2010, Gunlock open area to remain open. Sand Hollow area to remain open trail next to Swiss Mesa.

**Comment:** Map 2 6/14/10 Gunlock open area to remain open. Sand Hollow area to remain open.

**Comment:** Map #1 Sand Hollow would to propose to keep open!

**Comment:** Map 2 6/14/10 I would like to see Gunlock open OHV area to remain open. Also the Sand Hollow open OHV area to remain open.

**Comment:** In addition to the removal of domestic livestock grazing in the Beaver Dam Wash NCA, BLM should limit ORV routes in the non-designated road area of the NCA to protect the broad spectrum of wildlife species and sensitive lands in the Beaver Dam Wash NCA. BLM should adopt a "closed unless posted open" policy for the entire planning area to aid in compliance and enforcement. BLM must ensure that each route it designates within the NCA serves the conservation-focused purpose and need of the NCA and minimizes impacts to resources as required by FLPMA and the Executive Orders discussed above. To protect these species and their habitat, BLM should not designate redundant, unnecessary, and ecologically damaging routes within the non-designated road area of the NCA.

**Comment:** To minimize conflicts between motorized and non-motorized users, and also between motorized use and resources, BLM should adopt a zone system, much like that adopted by the Grand Staircase-Escalante National Monument (i.e., frontcountry, passage, outback, and primitive zones) that channel different uses (motorized and nonmotorized) into different places. Adopting a zone system will help ensure that visitors can go to areas that are specifically zoned for their interests, that adequate recreational opportunities exist for both motorized and non-motorized recreation and that adequately sized areas exist in which to get out of earshot of motorized routes.

**Comment:** Gunlock: the area west of the Gunlock road and north of the Shivwits reservation is a huge area that can easily support multiple types of recreation. One area of special interest to equestrians is the slot canyon that runs northwest just below the Gunlock reservoir. That slot canyon is an excellent, non motorized experience for horses and is very unique riding. We currently ride that canyon, exiting to enjoy the desert areas and drop over to Paoon Springs and back. That loop has been ridden for many years, and the experience of the high desert and low desert areas in addition to the slot canyon make it extremely enjoyable.

**Comment:** Off-Highway Vehicles Designation Map Travel Planning must include areas for quiet recreation that prioritizes the protection of natural resources, such as soil water and wildlife as well as avoiding conflicts with other recreationists and be noted on the OHV designation map. To fulfill the mandate in the Lands Bill to monitor trails CDF recommends that the RMP 1999 category "Open for Use

on Existing Roads and Trails" is eliminated because that category of trails cannot be monitored. (See CDF's Travel Management Zones Map Exhibit "A")

## ROUTE DESIGNATIONS

The remaining 217 comments under the Area/Route Designations category pertain specifically to route designations. Route designation comments were deemed to have been intended for the Comprehensive Travel and Transportation planning process, which was scoped at the same time as the NCA planning and RMP Amendment. Because of this, these comments are not found in this report, but in the Appendix A of the the Transportation Plan scoping report.

## RECREATION

**Comment:** I would like to see the mountain biking trails maintained and expanded in our area. I ride the local trails 5-6 times a week including the Bloomington trails - Bear Claw Poppy, Santa Clara trails, Church Rocks, JEM trail, Gooseberry Mesa, Little Creek Mesa and others. These trails/scenery rival anything that "Moab" has and brings enjoyment and exercise to locals and tourists. The trails during the winter are used by many for Salt Lake and other communities to the North. When everything else is frozen to the North, we still have rideable trails and it becomes a big draw and helps our economy locally.

**Comment:** As a mountain biker it is my interest that all existing mountain bike trails remain open for my use & enjoyment. At the same time, for me to enjoy the single track in our area these tracks need to remain closed to motorized vehicles. I would also be interested to see new, sustainable trails built within Washington County. As a board member of the Dixie Mountain Bike Trails Association we would also like to be involved in the maintenance/repair of existing trails as well as the designating & construction of new ones. The further development of Little Creek Mesa, Guacomole & Santa Clara River reserves is also a big priority for our group.

**Comment:** The subject area contains outstanding recreation opportunities, particularly in hiking & biking trails. The trail system on these public lands needs to be preserved as an important public recreation amenity.

**Comment:** Hurricane City has a future park proposed south of the existing airport. This park could be used as a trailhead for the trail accessing Molly's Nipple. The trail will continue along the south rim of Frog Hollow, eventually crossing Frog Hollow & connecting to an existing dirt road. The trail would be non-motorized use only. Another trail accessed from the same park would provide access to the Hurricane Cliffs to the south behind private property, preferably at the base of the cliff, if property allows.

**Comment:** Please consider using BBM & ROS to help guide recreation, transportation & trails use & designations.

**Comment:** Please also use this data to designate new appropriate SMRAs in the county. Consider eliminating SMRA's that are not essential.

**Comment:** How about putting in a good parking area at Elephant Gap. Kane Co. has a nice 5 acre parking spot they have put in at "PeekABoo." It keeps people from going all over the place & making new parking areas. If you see Elephant Gap on Easter weekend there were 40 groups camping all over the area. NOT necessary if we had 1 nice place to park & be able to get out of sand.

**Comment:** You have closed all of the Mail Drop trail except for "about" 1.8 miles round trip that people will have to hike in on. Most people can't hike 1.8 miles in 6" of soft sand. Open up the trail all the way & "we" will put up an iron post block so they can't go up the last part of the trail, where you see the "Drop." I have written a Mail Drop history & will be glad to share. The trail has been there since the 1800's. This trail is the most popular trail in the Elephant Gap area.

**Comment:** Please allow foot & ATV traffic to cross the Virgin River west of the Hurricane/LaVerkin bridge.

**Comment:** Please leave the boundary by 'the Mail Drop' to remain as it was.

**Comment:** Increase fines & consequences for anyone cutting fences & travelling in prohibited areas.

**Comment:** 1. Assure Bulldog Cyn & existing primitive trails stay open for 'rockhounding' via OHV & ATV. 2. Assure area NW of Central stays open for 'rockhounding' (casual mineral collecting) OHV, ATV. 3. Assure area SW of Leeds stays open for 'rockhounding' via OHV & ATV. 4. Ash Creek area stay open for OHV & ATV. 5. Sand Mountain: keep open for OHV & ATV. 5. Smith Mesa: keep open for OHV & ATV.

**Comment:** As the director of the Intermountain Collegiate Cycling Conference, I oversee competitive collegiate cycling in Utah, Eastern Nevada, and Southeastern Idaho. The IMCCC is recognized by USA Cycling, the governing body of competitive cycling in the United States. The IMCCC includes cycling disciplines in road, mountain, cyclocross, and track. This planning process particularly affects the mountain bike discipline and the IMCCC supports and encourages the development and maintenance of mountain bike specific trails that can be used for recreation, training, and even competitions. With adequate planning, the Southern Utah region would be a prime location to host the IMCCC Mountain Bike Conference Finals, and perhaps even the Nation Championships, attended by collegiate cyclists from all across the country. Please add the resounding voice of support from all the collegiate cycling teams in the IMCCC region in this cause.

**Comment:** As it relates to recreation we would hope to discuss the possibility of partnering with the BLM and Desert Preserve in establishing improved trailheads in the transition area between private property and public lands. We also encourage the BLM to expand non-motorized trails in the Red Cliffs NCA similar to the current White Reef project.

**Comment:** I would also like to express my support and encouragement for trail maintenance - even if it is organizing with local groups and business for support - we'll help!

**Comment:** I support the idea of designated ATV and ORV routes for certain areas. My concern is the ability of the BLM to patrol and enforce the restrictions to existing roads & trails designated. As a handicapped person, it is important \_\_\_\_\_? (illegible). Of the designated areas to have some roads - 4wd road access for me to use the land. Keep persons of limited physical abilities in mind when designating roadless, hiking only areas. These are areas that I can no longer go to - which I could.

**Comment:** Need to also work as much as possible with all the various groups interested in the areas - environmentalists, ATV riders, hikers, horseback riders, photographers and general visitors. All are important to end up with a comprehensive plan for the area. Also need to keep in mind the overall ideas of limited development and importance of open space & open vistas as wanted by the citizens of Washington County as specified by the report of citizen under Vision Dixie. Insure that there is adequate input and public comment for all sides to air their views and even though not everyone will be entirely

satisfied with the result, there can be plenty of available recreation for all. Keep multiple use in mind always.

**Comment:** I would like to see more horse trails - we have lots of land here & more trails are needed - also overnight horse stay - Pine Mtn. is only open a few months a year. The step overs in some areas were made too narrow. My saddle stirrups got caught on the side, very scary. I ride Leeds area, Red Cliffs, Red Mtn., Gunlock, Gooseberry Mesas, LaVerkin Creek area (off the Washington Dam Rd)(4 wheelers are destroying the area behind the OK corral area.) Santa Clara trails can we make an overnight area there?

**Comment:** I'd like to see horses be given fair consideration as well as biking, hiking, off roading. It would be even better if some education could be done to help everyone be aware of safety and courtesy of others using the trails as well. We ride 4-6 times per week on either the Cottonwood trails, the Leeds area, the Bracken Loop, Red Cliffs area, Red Mtn., Dixie Ntl. Forest, Zion, Gunlock and Washington Fields areas. Would really like to see the roads to Cottonwood Trail be graded and improved. They are heavily used and are very rough; esp. getting horse trailers in and out.

**Comment:** I would like to see more designated and developed trails on BLM lands throughout Washington County. The Santa Clara River reserve is an amazing trail system and it would be great to see more trail systems like it. Also, a separation between equestrian and mtn. biking trails is very important too!

**Comment:** In addition, having a place in the Red Cliffs Desert Reserve where dogs are permitted off the leash would be most appreciated. I live in Washington City and dogs aren't permitted at any parks there; not even on a leash. As a result I go to the Grapevine/Prospector trailhead to ride my mtn. bike w/my dogs just to be lectured by others that my dogs need to be on a leash. I understand why - to protect the sensitive desert habitat & desert tortoise, however, I would love to see a place where my dogs can run free in the reserve (close to my home).

**Comment:** Please consider upgrading the existing Mosquito Cove primitive campground by installing portable toilets & a trash dumpster to mitigate the pollution & trash disposal. Also, by erecting a rock/earth levee on a portion of the camping area, above the 500 year flood plain, the waste facility could be accessed in all weather conditions & avoid river confinement in d/T flooding. Please see the attached proposal from Mayor Allen Brown.

**Comment:** The Proposal: Interested parties (BLM, Virgin River Conservancy, Town of Virgin, Town of Rockville, Town of Springdale, Zion National Park, and Washington County sign a multi-agency agreement to form a Recreation Special Services District and Board to manage Mosquito Cove. According to the Utah League for Cities and Towns, a Special Services District would be the best way to protect the individual entities on the Board from liability provided that it hired a campground host to provide on-site supervision. The host could also collect nominal user fees that could pay off a loan to build a public restroom (preferably composting toilets due to lack of water), and vehicular control fencing. The Utah Trust reports that it could issue a liability policy to the District Board even though there is the flood plain issue.

This proposal parallels a similar Parks and Recreation Special Services District in Uinta County that also has liability insurance through the Utah Trust. It is interesting to note that BLM also manages campgrounds along the Colorado River near Moab, and the Calf Creek Campground north of Escalante.

The Virgin River Conservancy could play a major role in negotiations with BLM. To date, BLM has shown no interest in disposing of Mosquito Cove but may be open to a land trade or at least participating in a Special Services District. BLM has shown interest in finding an alternative location for camping if

Mosquito Cove is closed but efforts to find a suitable location within a reasonable driving distance to Zion Park have not been fruitful.

**Comment:** We would strongly encourage you to pursue hiring a motorized recreational specialist who has a background in Off Highway Motorized Use and perhaps enjoys and even owns an off-highway vehicle

**Comment:** We have some skepticisms and concerns with the development of this travel plan. Some thought:

- 1- A complete trail / road inventory with on the ground field trips with users.
- 2- Plans to develop specific user trails - single track, ATV, 4WD, Rock Crawler
- 3-Be proactive in your planning, plan ahead and not wait until there is a problem to act.
- 4- Utilize volunteers to help, many are willing to spent considerable time in the effort.
- 5- Have a mechanism in place to quickly resolve mistakes and errors in a management plan which would allow opening of previously disturbed trails and or areas without a full "EA".
- 6- Facilitate a committee of: Users, County, State and Federal people to chart long term goals and have the ability to change management plans, where and when needed.
- 7- Allow new data to be submitted during the complete process.
- 8- Stop reducing Motorized Off-Highway Vehicle opportunities, you keep pushing us in smaller and smaller areas.
- 9- The quality of the trail is important not just the mileage.

**Comment:** Public land planning in this area should take this into account and facilitate the continued equestrian use of the public lands. This can be done by planning trail heads to facilitate horse trailers and provide safe places to tie up horses. In areas that you wish to restrict to nonmotorized users we would recommend use horse gates.

**Comment:** Wilderness lends itself well to equestrian use and we would request that the designated wilderness remain open to equestrian use. There are several equestrian communities surrounding St George. For these communities the surrounding public lands are important for space to exercise and train horses. These lands are frequently used when time does not allow for trailering the horses to other locations. We would support maintaining these lands open to equestrian use.

**Comment:** I have to say that I'm very concerned about the Alternatives presented in the proposed Travel Management Plan. I do NOT support being presented with a "range" of Alternatives in which all represent a reduction in OHV opportunity. Neither the letter nor spirit of the BLM's planning policies, BLM's existing Resource Management Plan or the Washington County Growth and Conservation Act suggests, let alone mandates, an aggressive closure plan. Closure is not management. Closure is abdication of responsibility! The agency must develop a wide range of Alternatives, including an Alternative that enhances motorized and mountain bike trail-based recreation.

**Comment:** I suggest that the cumulative loss of motorized recreational opportunity be brought in as a formal Planning Issue. Motorized recreational opportunities have been reduced throughout the region. Recent planning efforts in all management areas surrounding the planning area have closed thousands of miles of roads and trails. Additional future closures can be expected on the Arizona Strip. The amount of closures has reached a critical mass. Every single mile of motorized route that is open today is extremely important. Further closures will have a larger impact than those in the past. Trail closures cause an increase in useage pressure and thus increased maintenance headaches on remaining trails. The loss of trails MUST be reversed.

**Comment:** The second Planning Issue I suggest is "trail experience distinct from road experience" issue. It is important to recognize the distinction between "trails" and "roads" during this planning process. Providing an arguably adequate road system does not in any way begin to address the demand for motorized single track, full sized 4x4 and ATV trails.

**Comment:** I am writing to express support for the 5 SRMA proposals that the Dixie Mountain Bike Trails Association (DMBTA) has provided to you. They are:

Santa Clara River Reserve

Greater Gooseberry

Little Creek

Hurricane Rim

Red Bluff

**Comment:** I am writing to express my personal support for the 5 SRMA proposals that the Dixie Mountain Bike Trails Association (DMBTA) and CFD have nominated during this scoping process. They are Santa Clara River Reserve, Greater Gooseberry, Little Creek, Hurricane Rim, Red Bluff, and the Lower Virgin/Atkinville.

By accepting the nominations and creating Special Recreation Management Areas that are relevant to the land use patterns of today the SGFO will only further itself in being a leader in land use, recreation and visitor services planning. Further, it will only help sever as an additional vehicle or tool to protect the resource values that I hold dear by assuring that responsible recreation activities such as mountain biking and hiking and other managed trail activities are taking place on these wonderful landscapes.

Of particular personal concern is the treatment of the Santa Clara and Red Bluff areas that are so popular for recreation yet are slated for sale. Please retain these lands and help protect them by adopting the SRMA list above.

The Hurricane area is so important for the economic viability of that community. Hurricane city is fast becoming the mountain bike and trail designation. With now 3 endurance events held just outside their door it is imperative that these lands and resource be managed in a way that fosters the community growth of that small town in a sustainable way, not one that comes with the boom and bust of sprawl development and resource extraction.

Gooseberry, it is world famous and just has to me managed at the next level.

Little Creek. the resource can't be ignored. It is time to manage little creek mountain to protect the amazing resources it holds.

**Comment:** I am writing to encourage as much motorized-use areas as possible. The elderly and handicapped must have motorized access or the public land is effectively taken from them. Public land is for ALL the public, not just a select few who are young and healthy enough to hike.

**Comment:** I want to speak out in favor of "trails" vs roads. Our machines are made for trail riding, we expect trails for that purpose. The 50-52 inch rule is perfect in setting a standard on who can use ATV trails, and who can not. I know that won't set well with UTV, side by side users. But if we make the trails bigger, the manufacturers will keep making the machines bigger.

**Comment:** Also, it would be a good idea to designate "recreation zones" on the public lands in Washington County, and to designate areas proposed for wilderness in America's Red Rock Wilderness Act as primitive zones to restrict ORV use and help these areas keep wilderness characteristics.

**Comment:** Special Recreation Management Areas

Establishment of recreation zones makes good sense during this comprehensive planning process. Given the growing pressures placed upon public lands due to population growth and increasing conversion of land to development in Washington County, the establishment of SRMAs will help guide management of specific recreation activities within a particular landscape setting.

Based on personal experience, I support the Santa Clara River Reserve SRMA that is being proposed by a coalition of groups, including the Citizen's for Dixie's Future. This area, given its cultural heritage resources and riparian/stream corridor habitat, should have a focus on quiet, traditional uses such as hiking, wildlife viewing, mountain biking, horseback riding, and viewing of petroglyphs. I am hopeful that the River Reserve's increased popularity does not lead to vandalism of petroglyphs (I recently observed chalking on rock panels adjacent to petroglyph sites), and believe that the SRMA status will give BLM increased abilities to manage the River Reserve with priority on conservation of its rich cultural and ecological resources.

I also support the proposed SRMA for the area that includes the Bear Claw Poppy Trail/ Green Valley loop, with an added concern that increased mountain bike use is, in places, causing an expanded network/braiding of trails, erosion, and associated impacts on fragile soils and vegetation. With the presence of the endangered Dwarf Bearclaw-Poppy, soils susceptible to disturbance, and unique ravines in this area, I feel that mountain biking use should be monitored and restricted, as needed, to protect sensitive areas.

**Comment:** On a side note, a couple of months ago, I was saddened to come upon the aftermath of a paintball session (including trash that was left behind) in the Green Valley Gap. I'm not sure of the BLM's policy on paintball, but would advocate for education and monitoring/enforcement to discourage this activity (or outright banning of it, if it is presently allowed -- it poses an obvious safety hazard, impairs others' experience, and degrades habitat).

**Comment:** I have compiled this list of mountain bike trails that, as a minimum, should be protected and maintained in order to retain the wealth of recreational opportunities they offer.

**Comment:** I am writing to express support for the 5 SRMA proposals that the Dixie Mountain Bike Trails Association (DMBTA) has provided to you. They are:

Santa Clara River Reserve

Greater Gooseberry

Little Creek

Hurricane Rim

Red Bluff

**Comment:** I am writing to express support for the 5 SRMA proposals that the Dixie Mountain Bike Trails Association (DMBTA) has provided to you. They are:

Santa Clara River Reserve

Greater Gooseberry

Little Creek

Hurricane Rim

Red Bluff

**Comment:** Balance Motorized and Non-motorized Trail Planning and Development. An updated Travel Management Plan is fundamental to enabling effective management of motorized uses. We need to identify areas where this use is appropriate, and areas where the protection of other resources, including natural quiet, are highest priority.

VRLPA believes that providing quality trail systems for all users is important. We appreciate that The Act directs BLM to identify and develop a trail system for OHV users. The current lack of such a trail system complicates management and doesn't help encourage responsible use. The BLM may also need to designate a few restricted "open areas" or play areas, in addition to Sand Mountain. Too many areas are being turned into local play areas without regard to current BLM use designations. Education and outreach need to be emphasized.

Non-motorized trails deserve equal attention, particularly trails for hikers and equestrians. There has been an over-emphasis on the development of mountain bike trails over the last several years. Unfortunately, what creates a quality mountain bike experience often does not create a quality experience for other user groups.

**Comment:** Recently, the BLM fenced off some of the trails leading to the Red Cliffs area, which is fine because I, also, would like to limit the riding of ATV's and motorcycles in this area. The BLM was kind enough, though, to put in stepovers for horses, which I greatly appreciate. The only problem with these stepovers is that they are a little too narrow and the wooden beams have sharp edges that can injure a horses shin dramatically; and if a horse gets injured going over them, it is very difficult to get the horse to go over them again!!! Also, I feel that they are a bit too high....which increases the risk for shin damage.

I was wondering if there is any way that you might be able to widen, lower, and file the beam edges of these stepovers....it would be greatly appreciated.

**Comment:** I have hiked, backpacked and photographed most of my life from Virginia to Idaho and the NW and now here in SW Utah. I am almost 70 years old now and my ability to access scenic and

photographic points is becoming fairly limited. For over a year I have been dealing with a severely broken foot which happened at the far north end of Snow Canyon Park. The point of this tale is to ask you to address the accessibility for aging and handicapped individuals to more remote sites.

I have lived here in SW Utah for almost 8 years. My observation of BLM land management is to close off significant points of interest and require a substantial hike to access them. Twenty years ago, I probably would have not objected to that approach, but the additional twenty years has changed by opinion significantly.

Let me provide an example. Wahaweep Hoodoos had been available via the wash from US Rt 89 either by SUV or ATV. This access was closed and now requires a 10+ mile round trip hike just to get to the hoodoo site via this route. For those of us familiar with the area and NO help from BLM, we could access the hoodoos from a road to Wahaweep Wash north of US Rt 89 and walk a mile south in the wash to the hoodoos. No motorized vehicles are currently allowed in the wash. BLM's next step was to close this access route to the Wahaweep Hoodoos and other very scenic sites along this road. This area is one of our favorite 'shoot sites' for the Color Country Camera Club. Since CCCC's membership is primarily older citizens, we can no longer get to that site.

We find it very disturbing that current BLM policy seems to be to restrict access to many points of interest, especially for senior citizens and or handicapped individuals.

As a result of my aging and injuries, I have acquired an ATV and joined the local ATV club so I can more readily access some of the sites I would like to photograph, but again BLM is closing more and more scenic areas to ATV use. We are loosing our rights to use our own land! We are very responsible citizens with a great appreciation for preservation of our natural resources. It seems that the actions of a few penalize the majority.

With that said, I would propose:

1) A rational multiuse approach to the management of newly designated and existing areas. 2) A permitting system for individuals or groups to access specific trails and points of interest via motorized vehicle. 3) Better rule enforcement and significant penalties for those that egregiously ignore the rules. The word would get around!!

**Comment:** Shooting. The city of Santa Clara has been asking the St. George BLM office to cooperate in establishing a location in the "South Hills" area of Santa Clara to serve as a shooting area. This is another locally-valued use, and one that could also be considered traditional, as locals in Santa Clara especially have been shooting there for years. Families, Scout groups, and church groups have often pursued this activity in the convenience of the South Hills. Many also find that the county shooting range at Purgatory is both too inconvenient and too formal for their tastes. I feel strongly that this is a use that should be preserved in the South Hills. There are many instances in the South Hills of shooting in unsafe locations and littering and I know that it is difficult for the BLM and for the City to police this activity. Without designation of a specifically-approved shooting area, these concerns will continue. However, I believe that clear designation of a safe shooting location, well marked with signs and on which the public is educated, will go most of the way toward addressing the current and past enforcement and safety concerns. Designation of a particular shooting area would also help to contain or centralize environmental contamination concerns, and I believe would also reduce litter as individuals understood the particular location's value and would want to preserve it for future use.

**Comment:** Shared recreational uses. I would like to emphasize that I believe that the above recreational uses can exist at the same time as other uses, such as hiking and biking trails, so that every desired

recreational use is preserved in a robust way. I believe any planning process that discounts or dismisses such locally-valued uses because they are too difficult to implement or preserve in any significant way for whatever reason, is a failure because I believe all of these uses can be managed and preserved together.

**Comment:** Some "old favorite" riding areas are no longer open to this kind of activity and we have been forced to find new areas. As you consider the new plan, I would encourage you to keep all existing motorized access open. I would hope this includes all types of motorized access.

**Comment:** I encourage the BLM to designate "recreation zones" on the public lands in Washington County. Areas proposed for wilderness in ARROWA should be designated as "primitive zones." This designation will restrict off-road vehicle travel, protect sensitive species, and ensure that these areas retain their wilderness character. And Special Recreation Management Areas (SRMAs) should be designated on the public lands in Washington County, including backcountry hiking SRMAs in areas proposed for wilderness but not included in the Omnibus legislation. And please evaluate river segments for potential Wild and Scenic River status.

**Comment:** My main comment is to carry forward the conservation mandate of these NCAs: "The Congressionally-defined purposes of the new NCAs are: to conserve, protect, and enhance for the benefit and enjoyment of present and future generations the ecological, scenic, wildlife, recreational, cultural, historical, natural, educational, and scientific resources of each unit." Given that there is proposed wilderness (under the America's Red Rocks Wilderness Act proposal) in each of the NCAs, I believe that stewarding the qualities that potentially qualify these areas for wilderness is an important priority.

There are several management approaches that I would like to see the BLM implement to help protect unique, biologically sensitive resources in the NCAs. One is to create backcountry hiking recreation zones in the areas where proposed wilderness overlaps with the NCAs. Another is to limit roads and motorized uses in the NCAs, especially in ecologically sensitive areas and those lands proposed for wilderness designation. And finally, I urge the BLM to dismiss the Northern Transportation Corridor option that passes through the Red Cliffs NCA. This would compromise the entire area, and undermine the conservation effort. Please advocate for the expansion of the Redhills Parkway, instead.

**Comment:** The ATV/motorized vehicle issue not going away but rather is increasing in intensity. People feel they are able to see places they would never be able to see without this transportation mode. I understand their feelings and desires, but I also understand that, as a person who prefers the tranquil, quiet experience that is afforded by restricting these vehicles to particular areas and the damage I've seen done by their unfettered travel, the BLM is in a unique position to plan effectively to meet the needs of all public land users. By carefully delineating areas where these vehicles can and cannot be used and employing strong enforcement – through presence, signage, volunteer involvement -- in those areas of greatest concern, the BLM can help get control of what might well become a completely unmanageable situation. Although I understand the position of the mechanized vehicle promoters, I also understand the damage they do to the land that includes destroying soils and allowing the invasion of species such as cheat grass. As a citizen of Washington County and, in fact, of the USA, I don't expect the government to enable my access to all areas if those areas are of some special concern. There needs to be education provided and actually required of all persons wanting to ride on BLM lands so they will understand the issues on those lands and the negative effects they might have. Perhaps tying vehicle licensing to the training might be a way of ensuring the proper training and knowledge is received. I believe that Selma Sierra, for Utah BLM director, was a great proponent of ATV use, herself being a rider. That is not a bad thing in and of itself unless that opinion translates into supporting riding anywhere and everywhere. I hope that Juan Palma, our new director, will have a more balanced view of the situation. Having attended a meeting of the RAC where they discussed the demands being placed on the ATV areas such as Little

Sahara, it's apparent that the pressure is on to accommodate the demand and the BLM will be needing an excellent plan to manage the situation.

**Comment:** If the BLM does decide to allow the use of damaging ORVs in the areas identified in Washington County for protection under ARROWA, I urge the BLM to identify manageable and clearly-marked ORV trailheads and routes to ensure that ORV use does not threaten the natural values of NCAs, wilderness areas, or other lands proposed for wilderness in ARROWA.

**Comment:** While engaging in the planning process for these Washington County lands, I request that the BLM employ the use of "recreation zones." Incorporating the zoning concept of recreation zones would prioritize certain uses in certain areas. The various zones would include: a "frontcountry zone" where most of the visitation would occur; a "passage zone" where travel routes would be used as passageways and recreation destinations; an "outback zone" that would offer an undeveloped and primitive visitor experience while also accommodating motorized travel on certain routes; and a "primitive zone" that would offer an undeveloped, primitive experience without motorized vehicle routes or access. For the lands identified with wilderness character in ARROWA, I urge the BLM to designate them as "primitive zones," restricting off-road vehicle travel, protecting sensitive species, and ensuring that these areas retain their wilderness character.

**Comment:** Special Recreation Management Areas (SRMAs) are another way to zone various uses into specific areas. In areas that are identified in ARROWA, the BLM should designate backcountry hiking SRMAs to preserve the wilderness values in these areas.

**Comment:** Let's protect the land by carefully regulating its recreational and commercial use; by setting aside the near pristine sections as wilderness areas; by not allowing commercial development in close proximity to national park boundaries; by placing environmental stability and protection above indiscriminate OHV use.

**Comment:** Designate "recreation zones" on the public lands in Washington County. Designate areas proposed for wilderness in ARROWA as "primitive zones." This designation will restrict off-road vehicle travel, protect sensitive species, and ensure that these areas retain their wilderness character. Designate backcountry hiking SRMAs in areas proposed for wilderness but not included in the Omnibus legislation. Conduct cultural resource surveys on all potential off-road vehicle routes on public lands in Washington County. Motor vehicle access increases vandalism and looting of cultural resources.

**Comment:** There is also a compelling need to establish a number of Special Recreation Management Areas (SRMAs) on BLM lands in Washington County. Properly designed and implemented SRMAs could do much to reduce existing recreational user conflicts, and to avoid or lessen adverse recreational impacts on resources, such as future habitat fragmentation from further illegal route proliferation. I have reviewed the proposed SRMAs described on the Citizens for Dixie's Future (CDF) web site, and I support and urge BLM to consider all of them. Specifically, these proposed SRMAs are Greater Gooseberry, Hurricane Rim, Little Creek, Lower Virgin River, Red Bluff, and Santa Clara River Reserve.

I believe that these SRMAs should strive to balance different recreational and social needs and uses, so that people know ahead of time where they can go to reasonably expect a desired experience, whether it be silent hiking or noisy ATVing. All lawful users should be respected in this balancing process, including mountain bikers, equestrians, and rock climbers.

**Comment:** However, the CDF list of recommended SRMAs omitted one that I think is important. It is needed along the Utah State Highway 18 corridor on BLM administered lands around and adjacent to the communities of Winchester, Diamond Valley, Dammeron Valley, Veyo, and perhaps Central. There is

substantial public use within a mile or two of these rural communities, including OHVs that have caused unfortunate, destructive, and illegal route proliferation and habitat fragmentation. These routes also add to the growing problem of cheatgrass and other invasive and noxious weeds.

I have witnessed these problems first-hand on BLM lands around Diamond Valley, where I am constantly finding new pioneered OHV trails, and added braiding to existing trails. Springs around Diamond Valley were altered for livestock and domestic water developments. At least two of them on BLM lands used to support some riparian vegetation and amphibian reproduction. Sadly, both are now nonfunctioning and the vegetation died and the amphibians dependent on them must either move elsewhere or die out. There is one depression in a small canyon that collects rain run-off and has supported toad tadpoles and tiger salamander nymphs. However, OHVs discovered it, and began using it as a “splash zone” where they can zoom through it and throw water and mud to both sides. This is apparently “fun” for them, but devastating to the pond life because it rapidly expedites the drying up of the pond long before any of the tadpoles or nymphs are mature enough to emerge and survive. As such, what may seem to be benign recreation to the OHVs is actually harmful, and increases the risk of extirpated amphibian species in this canyon and perhaps adjoining areas. In addition, there are old abandoned barbed-wire fences that represent an ongoing safety hazard for people, deer, and perhaps other wildlife species. And there are broken shards of glass and/or trash from de facto target shooting sites.

A SRMA designation along this corridor of rural communities would be a good way to begin to comprehensively address these existing recreational and social uses and associated safety hazards and resource impacts.

**Comment:** I think that the BLM SGFO should schedule a series of presentations at all of the Mormon churches and/or ward meetings in these communities to provide basic information about proper recreational uses and how to minimize conflicts and impacts. This is because the vast majority of the residents of these communities are Mormon, and church gatherings are where most community members obtain local information. Sadly, my impression is that many residents of these rural communities are either blissfully unaware of BLM information or apathetic about applying it as reflected in their often disrespectful conduct toward BLM lands and resources.

**Comment:** I don't think we need a road or trail on every mountain top or ridge, I don't want to loose any more of our precious riding areas or trails/roads. The number of people who use motorized recreation is only going to increase over time and smart management now is critical. Lets keep what we now have open to motorized travel. Remember if you use a "Loop System " of interconnected trails, people are less likely to go explore off the marked route. I believe we should add small sections of trail where needed to accomplish this. Marking of routes also helps in keeping folks from wandering off the legal route. Ask for help from clubs and other groups for trail construction, maintenance and marking, and you'd be surprised how many people would show up to volunteer. I don't believe in closing off access to public land to "save it" is a good idea. No one has ever explained who they're saving it for and what they are going to do with it later anyway.

**Comment:** Every summer when I go to areas I have enjoyed for years I have found more and more of the roads and access closed to camping, atv riding and other outdoor recreation. This needs to stop. Why restrict access to these areas to such a small percentage of the population? Many of the areas being closed down cannot be accessed by hiking. A person cannot physically carry enough water to hike in and out of these areas. To enjoy the beauty of these remote areas we need to maintain open roads and trails and go in with motorized equipment. What good is the area if we cannot access it?

**Comment:** Utah and many of the towns of Utah need the revenue brought in by recreationists going to see these areas, If the roads and access to these areas are closed these towns will be severely affected economically.

These areas not only need to remain open to the public but free to use unobstructed by access tax more commonly called “fees”. Do not create any areas of critical environmental concern. This is restricting the public’s use of public land and is another form of the government taking away our freedom we so cherish in this country.

**Comment:** I strongly support conservation education rather than closure of our public lands. Let’s spend our time and money on education that teaches recreationist to act responsibly. We have seen a major difference in recreationist’s attitude over the last 10 years in conservation of our public lands. Recreationists are staying on trails, keeping the land clean, and policing themselves. We want our public lands public and open to all recreation.

**Comment:** 4. The Tri State ATV Jamboree has been a huge motorized recreation event in the area for the past seven years. It has been extremely frustrating for the BLM as well as the Tri State ATV Club to make even the smallest corrections or additions to the original proposal so that mistakes and omissions could be corrected to improve safety and overall workability. The ten-year Environmental Assessment will expire in another four years. I would ask that any and all routes included in the final travel plan be included in the approved and available route inventory for the Jamboree to use. I would further ask that a provision be included in the final RMP that would allow for “corrections” to be made without it becoming a major project.

**Comment:** 10. The current RMP includes dry wash bottoms in the definition of a trail. I would urge that this definition remain in the new RMP.

**Comment:** 11. Along with the designation of trails and routes, designated staging areas should be identified and constructed. Some suggested areas would be (a) near Gunlock, (b) south of Hurricane (in process?), (c) near Bloomington off Navajo Drive, (d) east of Apple Valley to access Little Creek Mountain and Canaan Gap, and (e) near the Washington Dam area.

12. I would recommend that BLM plan for some maintenance on a few of the major designated routes and trails. This would provide for increased safety for users, discourage route widening or braiding, and reduce erosion. An example would be to level the “sand whoops” on parts of the Honeymoon trail in Warner Valley.

**Comment:** 13. I would recommend that the BLM plan for education and direction signing on the main and loop routes in the final RMP. Having the routes adequately signed would be one of the biggest things BLM to could do to direct travel where it is appropriate.

**Comment:** 14. Money is always an issue when providing travel and recreation management. I would urge BLM to become more involved in applying for grants to enhance motorized recreation.

**Comment:** The BLM, St. George Field Office is to be applauded for their continued use of the scientific processes of Benefits Based Management and Preferred Use.

IMBA is pleased to see and encourages the continued dedication to the scientific decision making tools of Benefits Based Management and Preferred Use Classification in the St. George Field Office. These sociological studies combined with ecological and biological studies provide sound reasoning that results in user experiences that are inline with their expectations and results in efficient use of natural resources.

Moreover, the proper use of these scientific methods is exactly the type of study envisioned by Congress when drafting the laws governing agency action.

**Comment:** IMBA requests that the closure of the public lands in the north half of Section 1, Township 42 South, Range 11 West of the Salt Lake Baseline and Meridian, including the unauthorized Slickrock Swamp Trail are reevaluated using the most recent scientific methods.

1 Section 706 of the Administrative Procedure Act requires agencies to consider all relevant factors and to develop a rational connection between the evidence in the administrative record and its ultimate decision. See *Citizens to Preserve Overton Park, Inc. v. Volpe*, 401 U.S. 402, 416 (1971) The fundamental goals of NEPA compliance include 1) ensuring that the agency takes a "hard look" at environmental consequences before taking a major federal action, *Earth Island Institute v. U.S. Forest Service*, 351 F.3d 1291, 1300 (9th Cir. 2003); *Citizens' Comm. to Save Our Canyons v. U.S. Forest Service*, 297 F.3d 1012, 1022 (10th Cir 2002), and 2) ensuring that the agency's decisions are not arbitrary and capricious. *Baltimore Gas & Electric Co. v. NRDC*, 462 U.S. 87, 97-98 (1983)

**Comment:** IMBA would also like to encourage continued and enhanced cooperation with adjacent landowners to formalize easements or facilitate land transfers to improve the trail system. Easements are necessary to maintain the current trail system in the Rockville Bench area. Additionally the current uses of the Red Bluffs area are endangered by the sale of private lands. These uses could be protected through the establishment of easements across the land or through outright acquisition of the property through a land transfer or purchase.

**Comment:** IMBA supports the designation of Special Recreation Management Areas IMBA is pleased to endorse the creation of five Special Recreation Management Areas: The Santa Clara River Reserve, Red Bluff, Hurricane Rim, Little Creek and the Greater Gooseberry areas. These areas will continue to provide a world-class mountain bike experience.

**Comment:** When you get my age, almost 70 you can not, and should not have to hike to every place in Utah you want to see. These areas need to be left open to all the citizens to use, rather you hike, ride OHV, or ATV's, or even horse back. Lets not restrict us, what little time we have left in life here, from using the public land that we still have a right to use.

We need to keep Red Butte, and all the Dixie lands down there open so all the citizens in Utah and stop worrying about some Damn Sand Beetle, they will survive, Trust Me. I vote No to changing any of this stuff, leave it all open and the way it is.

**Comment:** We have to ensure that there are places in our country that will remain like they have for centuries, without roads and noise. We have too much noise and light and air pollution in the cities; don't let it happen in our wilderness areas.

**Comment:** I understand that people enjoy less passive recreation, such as ATViing in such places. I would ask that this be limited to protect the land and the wilderness experience for us and future generations.

**Comment:** As a member of "Dunes and Trails ATV Club" in Las Vegas, responsible adult ATV rider and taxpayer, I strongly urge you to maintain the current level of usage available to ATV and OHV users. We care about the environment with the same passion that we care about our preferred form of recreation. I have found that a lot of people who say they are opposed to our sport are not involved in it nor do they care about seeing these areas for themselves whether on foot or by any other means. They have the preconceived notion that we're out there running down every creature and plant we come across. I realize that we have a few who disregard common sense rules but they are the extreme minority. I also recognize

that certain areas do need protection from any form of traffic and support those areas. Before any more restrictions are put on "off-road users" I would suggest a meeting of representatives from the various user groups with BLM to form a common-sense plan of usage and perhaps form teams to periodically monitor these areas to insure their continued protection.

**Comment:** Please do not designate "recreation zones" on the public lands in Washington County. Do not designate areas proposed for wilderness in ARROW as "primitive zones."

**Comment:** Please do not designate Special Recreation Management Areas (SRMAs) on the public lands in Washington County. Please designate backcountry hiking SRMAs in areas proposed for wilderness but not included in the Omnibus legislation. Hiking is allowed currently for anyone.

**Comment:** One of the areas we have enjoyed is the lower Virgin River. Here, although one is quite close to civilization, you can have a wilderness experience. We bring our binoculars and enjoy the birds in this area. This area is unique for its scenery and wildlife. We find that this area is in danger of being permanently ruined by the motorized vehicles that frequent the lower Virgin. The landscape with its fragile desert plants is being torn up. We often encounter the noise and smell from ATVs. For these reasons we urge you to designate this area for non-motorized use only, to increase the current size which is now under the ACEC designation and to redesignate the whole area as a Special Recreation Management Area.

**Comment:** I am writing as a biologist, teacher and citizen to urge the BLM to support conservation of the wilderness areas and NCA's in Washington county. I have taken my university students on field trips to the Beaver Dam Wash area for years. It is a wonderful example of habitats and makes for a productive learning experience. I have also hiked for personal pleasure in many BLM areas across the country. In almost all areas, the vegetation suffers from overgrazing, which reduces its value for wildlife, disturbs sensitive plants and increases dust. Over the years, the impact of ORV has been growing and is increasingly destructive. Please limit these activities and designate areas as primitive. Areas with wilderness value will only become more important for humans in the future, preserving diversity and ecosystem function as well as providing areas for recreation and tourism.

**Comment:** The Lower Virgin River ACEC should be expanded and also designated as an SRMA. It should be preserved for non-motorized recreation. First, I have been a four-wheeler in the past and enjoyed the sport responsibly by staying on developed trails and not destroying the land which the off road vehicle allowed me to enjoy. Most of the off road vehicle users are responsible, courteous, and respect the rules which protect our environment, however, there are the few (and that is all it takes) that feel that the thrill of 'testing' their machine and riding ability by going up steep hills in the process destroying plant life, (endangered or common) and permanently scarring the fragile desert land.

**Comment:** Second, There is not enough law enforcement personnel or budget to police these individuals. Self-regulation actually puts the responsible off roader and the land at risk.

**Comment:** Shortly after moving to the St. George area in 2005, we discovered the area currently known as the Lower Virgin River ACEC. We have marveled at the ancient pithouses, the desert plants and wildlife, and sought to learn more about the complex geology of the area. At the same time, we have seen more and more ATV trails crisscrossing the area and noted what seems to be an increasing use of the area for target shooting and other sorts of firearms recreation (an endangerment to us and others seeking to appreciate this stretch of desert). We feel that it is imperative to provide more protection for an area so rich in natural and cultural resources (including remnants of the southwest's ranching heritage). We urge the BLM to give serious consideration to the proposal to create a new SRMA in this area and hope that

BLM representatives will go out and see for themselves the extent of the damage being done, if they have not already done so.

**Comment:** As a representative of the Outback Hiking Club of Southern Utah, I have been authorized to report that the proposal to enlarge the Lower Virgin River ACEC and redesignate it an SRMA has the backing of the club (a group currently consisting of 268 members, almost all of whom are residents of southern Utah).

**Comment:** As a citizen of Dixie, I urge you to preserve the unique geologic features and recreational areas of this part of southern Utah for future generations. In addition to the preservation of the unique landscape and recreational and open areas, in this arid land water conservation, quality and protection is also a primary concern! I've watched Citizens for Dixie these past years spend thousands of hours getting public input on Dixie's future growth and how that can be done while preserving the natural habitat, splendid geologic formations, clean water, etc. I ask that BLM work with all the locally involved agencies in this area and especially the recommendations which have come from the citizenry through Citizens for Dixie recommendations. This part of Utah's landscape is unlike any other in the nation and any changes or decisions regarding the preservation or use of open areas, trails, water use and quality should be made only by getting all concerned agencies involved. I have studied CDF's recommendations. They are well thought through and very accurately reflect the growth and land and habitat preservation concerns of this southern Utah area. Please keep these trails open for equine use.

**Comment:** Santa Clara Reserve:

My in-laws live in Ivins so when Q and I would come and stay for a couple of days it was great to be able to hop on the bike and ride over to get some fun single track loops in. The views are great of Red mountain and other surrounding mountains. It is so nice to have something so close that in 10 to 15 minutes you can feel like you are out of town and enjoy the falcons flying overhead and unobstructed views. Anytime you can create open space around a large community or a growing area it's always a plus in my book for the quality of life.

Red Bluff:

This area is the first area I rode in St George. It is a great area because it has something for every level of rider. Being right in the middle of everything it is a great location for locals to be able to get out and recreate, whether they need a quick ride or a long ride. I really enjoyed doing the big loop Stucki and then adding some technical stuff by the Green Valley Spa before heading back down to the Bloomington side.

However I must say that I was a bit frustrated when I would see that motor cycles and ATV's had been on the back side of Stucki and tore it all up widening the trail tread and making me pissed instead of having a peaceful ride. The Bear Claw Poppy trail has seen a lot of widening due to novice use and this trail probably should be a bit wider, because novices have a hard time staying on skinny single track. I really think St George needs this area to be protected in SRMA it is very value- able open space for the quality of life in this area.

Hurricane Rim:

The Hurricane Rim is dear to my heart because I was involved in building and designing part of it. I love putting together the JEM, Gould's, and the Hurricane Rim for a big loop it gives me a little bit of everything with unobstructed views and falcons flying over head. And the wild flowers in spring are incredible, who knew those bushes could produce such pretty flowers. With Hurricane being a growing community it is nice to be able to have this open space so close that you can ride from your house and be

on such an incredible trail system. This area also provides something for every rider from novice to advanced.

I have also come across ATV tracks out on this area in places they should not be which is always gut wrenching to see especially when you are trying so hard to keep the trail tread narrow and as unintrusive as possible and have built them by hand, not with a machine.

Greater Gooseberry:

This area of course is world class with all the incredible views of Zion and the surrounding areas. Who doesn't enjoy Gooseberry the white trail for novices to start on and build from there. This is by far one of my favorite places to ride. This place is great because no matter how skilled you are it can still challenge you especially if your caught looking at one of the great views while trying to ride. This is a place where you go and spend all day stop take in the view and have some lunch. This area is also a great area for the local economy and needs to be protected from structure development for the views, single track and the experience.

Also on the west side of Gooseberry the trail connecting into Grafton Mesa I have to say is spectacular with views and its a single track trail that a novice can ride and get a taste for Gooseberry. Also the idea of linking the riding areas really makes sense to me for the individuals that want to get in some long epic rides.

Little Creek:

What can I say this area is incredible all the way around, with great views, riding for all levels of riders, amazing landscape and of course all the amazing history. This area is super high on my priority list to protect and make sure that it is managed properly. When I ride in this area I feel like I am going back in time to a great civilization and ride in this area with the utmost respect.

I have seen plenty of ATV tracks out there in different place and do not appreciate it.

One other thing I would like to comment on is shared use among non-motorized groups on the same trail which I think can be a great idea. Where you have to be real careful is mixing horses and bikes. (I do own horses, they were my first love) Trails that have lots of slick rock on them, fast descents, with blind turns, and soils that will not hold up to horses tromping and churning them to thick sand pits. Sand pits create an unpleasant experience for a biker. As well you need to clear trail through trees wider and higher which makes the riding experience different for a rider on a bike. Horse riders and bikers are looking for different experiences when it comes to trail corridor. Horses need more head room and width so that a horse riders head doesn't get taken off, or there legs. Bikers like to dodge, duck and weave through the trees. Bike riders have to stick to the trail tread they are limited in where they can go, they can not just go across country. A horse can step over and go around and is not stuck to the trail tread. While I think that horses can definitely be in the same area as bikes, but not necessarily on the same trail

In closing I would like to endorse the 5 SRMA areas that the Dixie Mountain bike Association are proposing and sum up what is important to me in a riding area. I look for great views, fresh air, wildlife, single track, challenging technical trails, fast flowy trails, and being able to ride from where I am staying.

**Comment:** I am a mountain biker from Logan, Utah. I have spent many wonderful hours down in your county riding these wonderful bike trails that you have. I am very pleased with the amazing trails that you have available for mountain bikers such as myself. I have found these trails to be suitable for all levels of riding, and I highly recommend them to anyone that I speak with. My wish is that as you review the

network of trails in your beautiful county, that you allow us to maintain and use these trails as well as build new ones as time goes on to keep this sport alive in your area!

**Comment:** Now to my main concern, travel plans across this great desert that we can all enjoy here in the Washington Co. area. I came to the area after retiring because of the opportunity for traveling the many dirt roads, trails and washes throughout this area and enjoying the past and present history of the area. I have explored many of them and there are many more to explore. I'm amazed every time I'm tooling down a wash or road and I see those brown markers showing things and places that someone says we shouldn't be going. Did someone just give some SUWA members a truck load of these and told them to use them up, and put them where ever they thought they wanted to put them. They are in washes that mother nature will alter when ever she decides to and the tracks will vanish. They are in the trails that have been used for decades and now someone wants to limit the trails available to use to travel. They are even in the middle of some roads that have been there for decades and longer. There are hand written signs that tell us to stay on the trail and in the washes. Other printed signs that asked us to stay on the trails in sensitive areas have been removed, why? The motorized population is growing every day and the more restrictions you put on travel the more beat up and degraded the trails you leave open will become. You don't need less trails you need more. On a lot of the weekends you have to really stay on your toes then traveling the trails to avoid a head on with another vehicle of some sort.

**Comment:** The BLMs credibility with me really suffered when I saw that they were digging trenches 4 or 5 or more in the Desert Habitat Reserve out by the access road into Warner Valley. You saved that area from the off highway crowd and now the state is going to put a 4 lane highway through it. That sure is a fine Desert Habitat Reserve isn't it. But it is a dumping site for people that are too lazy to go to the dump also. You ever go over by the catch basins and see all the garbage that is dumped there. You have the same thing going on over between Bloomington Hills and the freeway where it is being saved from off highway vehicles but it is now being ravaged to build roads and I predict soon more houses and businesses. Another sore spot with me is all the trash that people leave in the desert. They take everything you can imagine to shot it up and leave it for someone else to look at. Clay pigeons are in a lot of places. I actually saw two BLM rangers a few months ago in Warner Valley. I asked about the shooting galleries that are out there and all the clay pigeons and their answer is they are biodegradable. Really, in how many years? Why aren't they patrolling more, people are shooting all over the place and even shot without a back drop to stop bullets from traveling across the valley at times. They are leaving piles of casing from shotguns and other fire arms every where.

**Comment:** There needs to be competitive OHV tracks set up for use in the Southern Utah area. Also an OHV trail that ties into the Nevada silver state trail system

**Comment:** An area about a mile south of Gunlock Dam, a wash going west from the Santa Clara River, the canyon mouth is in the NW 1/4 sect.8,T 41S,R 17W.- ATV's and dirt bikes are badly tearing up the lower end of this scenic canyon for half a mile, not staying in the wash bottom but running up the sides, tearing up the vegetation and causing erosion. The user caused access into this canyon should be closed to stop this. The access point is only 10 feet wide and could easily be physically closed to ATV,s and other motorized vehicles in the name of resource preservation. This makes an excellent hike up the wash into a scenic canyon. I have turned in to BLM pictures of the damage and coords of the wash mouth.

**Comment:** Horse traffic in the Desert Reserve on BLM land is not following signed trails and wash bottoms very well -wash meanders are being short cutted by horses and new trails are wandering up and down the hills. Horses make significant torn up trails in sandy terrain. Signs at popular trailheads noting horse etiquette in the Reserve could help.

**Comment:** I understand you're reevaluating the use of Mountain Biking trails around Zion and St. George. I wanted to let you know how important the MTB trails around Zion and St. George are to the mountain biking community. I live near Salt Lake. Many of us count on the Zion and St. George area as a mountain biking refuge during the winter - since our trails are covered with snow until June. My friends and I all enjoy going into town for dinner, movies and other activities while we're visiting for mountain biking, so the trails must provide a sizable influx of tourism.

If these same trails were open to horses and motored vehicles for shared use, they would no longer be attractive to the mountain biking community. Horse dung is no fun to get in your tires. And when you're huffin' hard to get up the hills, the last thing you want is to breathe in exhaust fumes.

Please, if the equestrian and motored vehicle communities need more trails - please develop them somewhere other than our beloved mountain biking trails.

**Comment:** I am in favor of keeping mountain bike trails in the southwest.

**Comment:** It has come to my attention that the trail system, present and future, is going to be under review in the coming months. I would like to state my opinion, as a resident of Colorado, in favor of preserving and expanding the trail system in your area.

Gooseberry Mesa, and some of the other trails I have ridden in Washington County, are among the best in the world and often become destinations for dedicated mountain biking trips.

I also have a friend and customer in Hurricane that depends on mountain bike tourism. I would like to see his business thrive and the best way to ensure that is to promote a thriving cycling culture in the area.

**Comment:** Please count my name as one who frequently travels to the St George area to ride non-motorized mountain bike trails. Please keep open what is there, and PLEASE don't make them open to motorized travel. Also, more single track mountain bike trails would be much appreciated.

**Comment:** 2. Recreation. We encourage the BLM and the Red Cliffs Desert Reserve to preserve existing recreational amenities currently located within the Red Cliffs NCA and to develop additional recreational amenities including non-motorized trails, trailheads, and primitive camping sites. The current development of the White Reef trail system with an improved trailhead in the Red Cliffs National Recreation Area is a good model to follow for the Red Cliffs NCA. We would welcome the opportunity of partnering with the BLM to establish improved trailheads on the edge of our development providing access to an expanded trail system within the Red Cliffs NCA.

**Comment:** As a resident I would like the BLM to monitor impact of roads and trails on the environment. Implement a photo monitoring program and triggers for closure. Identify locations of special areas or uses on BLM land that need to be protected or managed differently than they are now. Identify natural resources (wildlife habitat, soil and watershed, historic & cultural) that are threatened now and can't wait another 10 years for protection. Take specific steps to protect them with new standards, focus & prioritization. Roads should be limited to minimize their impact on the NCAs.

**Comment:** In any event, I would like to urge you to do your utmost to preserve what is left of the beauty and solitude of this area. In particular, limiting the access of the extremely noisy and destructive OHVs, as well as access by airborne motors (such as motorized gliders, helicopters, etc) is enormously important. There are huge numbers of existing trails already in place for OHVs. All they ever do is demand more, always more. They give no acknowledgment at all of the problems that their machines create for

everybody else. Preserve some space for hikers, bikers, any non-destructive quiet sport, for Heaven's sake. And for Utah's sake.

**Comment:** 1. Access for off road should be allowed for existing off roadways. This off road access should be limited to prevent damage to drainage areas, plant and animal life as well as noise kept to a minimum. 2. Dumping of trash and littering should be eliminated as much as possible. When I ride horseback even in the Desert Reserve I am always surprised how much trash I pick up and carry out in my saddlebag. 3. On Red Mountain trail I have carried out lots of trash as well. 4. The areas on BLM east and south of Washington have areas of dumping of building materials from local construction sites as well as local trash. 5. I have enjoyed horseback riding on many of the public lands in our surrounding areas including: Gooseberry Mesa, the Desert Reserve, Pine Valley Mountain, Gunlock area by the dam, Blackrock, Arizona Strip, Honeymoon Trail area and others. 6. I hope to see the Red Cliffs Parkway to be the major access to the Northern Corridor. I'm not sure this will happen considering the overpass being constructed just below Winchester Hills. I'm sure some "big money" has been involved in that area. 7. The relationship of offroad or ATV people with the hikers, mountain bikers and horseback riders are compatible, but the impacts of ATV's on the land are very negative. I really like to see selected areas for ATV use that isolate the "wild uncontrolled" riders from the rest of us. I used to enjoy riding the sand hills just south of Sand Hollow Reservoir, but no longer. The ATV's there are just crazy. I realize ATV people have a lot of money behind them as well. I just hate to see areas become exclusive. I feel public lands should be accessible to all. 8. I have seen the plan for Red Mountain Trailhead and feel we should have planned for some horse camping, but the years of collaborative planning we (Backcountry Horsemen) put into that trailhead has been completely ignored with no explanation. This is unacceptable and I feel we deserve an explanation as to why our continued input has been complete and so rudely ignored.

**Comment:** B. BLM Must Adopt A Legal Definition of the Term "Road." As discussed above, Congress has directed BLM to limit motorized vehicle use to designated "roads" within the NCAs. This directive contrasts with the management direction for the greater field office, most of which remains available for motorized and mechanized use in designated "areas" and on designated "trails" and "roads." Thus, BLM must recognize this critical distinction when it develops the Travel Plan, and only permit motorized vehicle use in the NCAs on designated "roads" and not in "areas" or on "trails." Moreover, in the Travel Plan, BLM must ensure that it designates "roads" in the NCAs that meet a legal definition of the term "road." One such definition is found within IM 2008- 014, which defines a "road" as a "linear route declared a road by the owner, managed for use by low-clearance vehicles having four or more wheels, and maintained for regular and continuous use." By applying this definition, BLM would ensure that motorized vehicle use only occurred on actually constructed and maintained roads and not on "primitive" or user-created roads, which are usually established without regard for their potential impacts on cultural, historic and other conservation resources.

**Comment:** We would strongly encourage you to pursue hiring a motorized recreational specialist who has a background in Off Highway Motorized Use and perhaps enjoys and even owns an off-highway vehicle

**Comment:** Some thought:

- 1- A complete trail / road inventory with on the ground field trips with users.
- 2- Plans to develop specific user trails - single track, ATV, 4WD, Rock Crawler
- 3-Be proactive in your planning, plan ahead and not wait until there is a problem to act.

- 4- Utilize volunteers to help, many are willing to spent considerable time in the effort.
- 5- Have a mechanism in place to quickly resolve mistakes and errors in a management plan which would allow opening of previously disturbed trails and or areas without a full "EA".
- 6- Facilitate a committee of: Users, County, State and Federal people to chart long term goals and have the ability to change management plans, where and when needed.
- 7- Allow new data to be submitted during the complete process. 8- Stop reducing Motorized Off-Highway Vehicle opportunities, you keep pushing us in smaller and smaller areas.
- 9- The quality of the trail is important not just the mileage.

**Comment:** These comments are specific to motorcycle observed trials needs on the SGFO. Motorcycle observed trials is a very specialized form of motorcycle riding / competition. Trials requires relatively small "open" area designations that are rich in obstacles such as rock formations, boulders, sand, logs, ... anything that can provide a variety of challenges and challenge levels for skill levels from novice to champion-level expert riders. Trials motorcycles are very light, have relatively low / smooth power, and have soft waffle-pattern tires run at very low pressure. The design, along with the way trials bikes are ridden, results in very low impact when compared to other OHVs. For more background, a brief summary of motorcycle observed trails is attached.

The Wasatch Trials Association has held events under a SGFO SRP for several years in the Pachoos Gulch area, which is well suited to early season (January or February) events.

Please consider a SRMA for the Pachoos Gulch SRP event area. This could be a conditional "open" area that's only "open" to trials motorcycles for events and practice. Other OHVs and OHV use could be limited to designated trails and roads.

**Comment:** B. General Comments on off highway vehicle and mountain bike use

1. We briefly polled a few of our members who regularly visit the Arizona Strip and the SGFO who live in the St. George, Cedar City and Kanab areas and they were very specific insofar as what they would like to see in a revised Land Use Plan: More Single Track Trails (motorized and mountain bike)!! More ATV trails!! More 4x4 trails!! More Rock Crawling Trails!!

(They asked me to make that point with BRC's characteristic gusto, so that you folks on the planning team would incorporate this important comment into the decision making process.)

2. There is an increasing demand for OHV recreation opportunities:

Clearly, there is an increasing demand for OHV recreation opportunities on public lands and National Forests. BLM's OHV Strategy states, "Motorized off-highway vehicle use on public lands administered by the Bureau of Land Management (BLM) has increased substantially in recent years. ... Some of [the factors contributing to growing OHV popularity] are:

- greater public interest in unconfined outdoor recreational opportunities
- rising disposable income ...
- advances in vehicle technology
- the rapid growth of the West's cities and suburbs ...
- a population with an increasing median age with changing outdoor recreational interests

BLM's OHV Strategy recognizes, as does policy outlined in BLM Manual 8340 (May 25, 1982), that off-road vehicle use is an 'acceptable use of public land wherever it is compatible with established resource management objectives. As established by the Federal Land Policy and Management Act of 1976 (FLPMA), the BLM is required to manage public lands on the basis of multiple-use and sustained yield, while protecting natural values. ... Motorized OHV use is now firmly established as a major recreational activity on BLM-administered public lands." National Management Strategy for Motorized Off-Highway Vehicle Use on Public Lands, U.S. Department of Interior Bureau of Land Management, January 21, 2001, p. 2-3.

**Comment:** 3. BRC supports the retention of the "Open" designation across Alternatives.

BRC supports the OHV "Open" area of the Sand Mountain Special Recreation Management Area under all alternatives. This is consistent with the agreement for joint management by the State of Utah's Sand Hollow Reservoir State Park.

BLM should consider other areas where small Open area designations are suitable. For example, staging areas are sometimes appropriate for the Open designation. "Tot Lots" where children and young adults can recreate with their friends in an area close to parental supervision are highly valued. Some OHV events, such as motorcycle trials competitions, require the "open" designation to be viable. The SGFO has several areas where trails events could be held with little or no environmental impact. At least one alternative should include designating a trials competition area similar to the one at 3-Peaks.

**Comment:** 4. BRC emphasizes the need to provide for trials motorcycle and 4x4 rock crawling opportunities in the new RMP. Trials motorcycling and rock crawling are very popular in the area. There are many areas in the UFO where providing this type of use can be provided in a sustainable and manageable manner.

**Comment:** 5. Need for "point-to-point" recreation opportunity.

Long distance, "point-to-point" recreation is becoming increasingly popular with motorized and mountain bike enthusiasts. The SGFO is a key hub for this type of recreation. Routes that lead travelers from Mesquite, Nevada to St. George Utah need to be identified.

**Comment:** 6. There is a need to provide for commercial motorized tour operators.

Yet another popular activity that is expected to grow, motorcycle and ATV tour operators provide a needed service and economic benefit to adjacent communities. Similar to our recommendations regarding permitted and competitive events in section F of these comments, we strongly encourage the BLM to consider evaluating commercial activities, as much as possible, within the programmatic land use plan, thereby streamlining the permitting process and reducing staff workload.

**Comment:** E. Suggested Planning Issues

BRC requests that the SGFO consider the following Planning Issues and we encourage the BLM to incorporate them into the planning and develop appropriate alternatives addressing each.

Issue 1: Cumulative loss of OHV recreational opportunity

The cumulative loss of OHV related recreational opportunity is a significant issue that should be incorporated into the analysis and into the decision making process. NEPA requires federal agencies to properly analyze the direct, indirect, and cumulative effects of the proposed action. 40 C.F.R. § 1508.8.

Cumulative effects include “the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably-foreseeable future actions....”. 40 C.F.R. § 1508.7.

In NEPA, the term “environment” includes the “human environment” which “shall be interpreted comprehensively to include the natural and physical environment and the relationship of people with that environment.” 40 C.F.R. § 1508.14. Thus, the agency’s duty to analyze impacts does not end with impacts to the physical environment, but includes all of the effects on the human environment, including the effects by vehicle-assisted visitors.

Discussion:

BRC emphasizes the need to provide sustainable travel routes for motorized recreation. This need has resulted from both an increase in the popularity of OHV use and the elimination of OHV opportunities in the region.

Motorized recreational opportunity has been and will be drastically reduced throughout the region. Recent land use plans on adjacent BLM and National Forest lands have significantly reduced opportunity for motorized recreationists, while at the same time provided additional opportunity for those who prefer a non-motorized experience. Additional closures are expected via site specific travel planning on the Arizona Strip.

The amount of motorized route and area closures has reached a critical mass. Every single mile of motorized route that is open today is extremely important. Further closures will have a larger impact than those in the past.

Issue 2: "trail experience distinct from road experience"

It is important to recognize the distinction between "trails" and "roads" during this planning process. Providing an arguably adequate road system does not in any way begin to address the demand for motorized and mountain bike single track, full sized 4x4 and ATV trails.

Naturally, like all recreational enthusiasts, BRC’s members and supporters are interested in quality recreational opportunities, and most prefer a trail experience. Insofar as that can be reflected as a planning Issue, we would suggest “trail-based recreational experience” be considered.

Significance criteria such as “loops,” “level or range of difficulty,” “scenic quality,” “destinations,” “connectivity” or other similar qualities OHV users appreciate in trails should be considered by the planning team.

**Comment:** F. Permitted and Competitive events should be considered in the RMP.

We strongly encourage the BLM to consider evaluating event activities, as much as possible, within the programmatic land use plan, thereby streamlining the permitting process and reducing staff workload.

The SGFO hosts a variety of very popular motorized and non motorized events. These range from “club rides” to equestrian events to ATV Jamborees to mountain bike events to Dirt Bike races. Requirements for processing special recreation permits are hard to understand for small social clubs, require detailed event plan, liability insurance and \$\$ deposit. Permits are often issues at the last minute, just days before the event.

Both the agency and the recreational stakeholders will benefit from specific management direction that will streamline the permit process.

BRC suggests the SGFO consider developing an Alternative that would evaluate certain routes/areas for competitive and other permitted events for motorized and non motorized uses.

The BLM has permitted many off highway motorcycle desert races, rock crawling, mountain bike and ATV Jamboree events. Impacts associated with these events are well known. On many routes, archeological and other resource inventories have been conducted. It would provide a public benefit to all trail users, both motorized and non-motorized, to approve routes for permitted events in the programmatic travel planning process.

Such an alternative could develop a process to expedite the approval of competitive and other permitted events. It could also develop standard stipulations for permitted and competitive events. This can be accomplished through known “pre-approved” routes in which an event organizer can choose from.

The alternative could establish a annual review process in which the SGFO and recreation permittees would meet and discuss any management actions or issues indicated through monitoring and evaluation. An outcome of this process could be a prioritized project list for use in implementing the monitoring and maintenance plan.

**Comment: J.** BRC supports the designation of managed open areas for trials motorcycles

Trials motorcycle riding is surprisingly popular among BRC’s membership in Utah. We strongly support the inclusion of managed open areas for trials motorcycle riding.

**Comment: K.** BLM should consider designating the remaining BLM lands a SRMA.

Given the popularity of recreational uses in the SGFO, it seems appropriate to suggest that the entire planning area be designated as a SRMA. SRMA designation allows BLM more flexibility to meet the needs of recreational uses. Conversely, the ERMA designation sometimes limits managers options to manage recreational users and protect resources.

**Comment: M.** It is important that all of the Alternatives (and the ea) enhance recreational activities

Sec. 1977. of the Washington County Growth and Conservation Act Washington county comprehensive travel and transportation management plan states in part:

(1) IN GENERAL.—Not later than 3 years after the date of enactment of this Act, in accordance with the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1701 et seq.) and other applicable laws (including regulations), the Secretary, in consultation with appropriate Federal agencies and State, tribal, and local governmental entities, and after an opportunity for public comment, shall develop a comprehensive travel management plan for the land managed by the Bureau of Land Management in the County—

(A) to provide to the public a clearly marked network of roads and trails with signs and maps to promote—

(i) public safety and awareness; and enhanced recreation and general access opportunities;

(B) to help reduce in the County growing conflicts arising from interactions between—

(i) motorized recreation; and the important resource values of public land;

(C) to promote citizen-based opportunities for—

(i) the monitoring and stewardship of the trail; and trail system management; and

(D) to support law enforcement officials in promoting—

(i) compliance with off-highway vehicle laws (including regulations); and effective deterrents of abuses of public land.

(underline emphasis added) Fortunately, the BLM has a large available land base from which to proceed, well-organized user groups with whom managers have a historical relationship, a historical relationship with interested local governments and state agencies, and funding sources from several grant programs.

In our view, the challenge is best framed as: how best to use these resources to revise travel management to meet the mandates of the Act, the needs of the public and protect the resources.

**Comment:** N. Comments regarding recreational use conflict

It seems that barely a week goes by before some BRC member forwards us an “action alert” from various Wilderness advocacy groups encouraging their members and supporters to send comments to land managers regarding OHV management on federally managed lands. We certainly defend their right to do this, however, we have noted that they have increasingly encouraged their supporters to refer to Executive Orders (EO) and often give detailed instruction on how to and what to say regarding the user conflict issue.

This appears to be a growing trend with these organizations so we can imagine the planning team may have already received comments referring to perceived conflicts between motorized and non-motorized visitors.

To better understand recreation conflict and managerial solutions, we would like to direct the planning team to selections from *Recreational Trail Conflict: Achieving Equity Through Diversity* (Koontz 2005).

Conclusion

Without providing alternatives, the supply for one or both uses will shrink, which leads to crowding. Crowding only intensifies use conflicts (Moore 1994). So the final RMP should also insert the following paragraph: "Where use conflict occurs, the BLM will take steps to mitigate the conflict and, if necessary, provide alternative opportunities for one or both uses."

Understanding recreational interests and concerns is key to successful management. By breaking free from the pattern of "ignore and restrict," the revised RMP can lay the foundation to provide ample opportunities for many kinds of recreation. Quality trails would foster a sense of stewardship, prompting all user groups to help conserve natural resources.

**Comment:** Finally, the BLM should create special recreation management areas for quiet, traditional uses such as hiking, horseback riding, and wildlife viewing. The Bureau of Land Management can provide quality experiences for all recreational visitors by establishing zones across the entire field office to prioritize different types of recreation in different areas.

**Comment:** The end result of this plan should include an enjoyable and sustainable road and trail system that provides adequate opportunity for existing and future use.

I do NOT support being presented with a "range" of Alternatives in which all represent a reduction in OHV opportunity. Neither the letter nor spirit of the BLM's planning policies, BLM's existing Resource Management Plan or the Washington County Growth and Conservation Act suggests, let alone mandates, an aggressive closure plan.

The agency must develop a wide range of Alternatives, including an Alternative that enhances motorized and mountain bike trail-based recreation.

**Comment:** I suggest that the \_cumulative loss of motorized recreational opportunity\_ be brought in as a formal Planning Issue. Motorized recreational opportunities have been reduced throughout the region. Recent planning efforts in all management areas surrounding the planning area have closed thousands of miles of roads and trails. Additional future closures can be expected on the Arizona Strip. The amount of closures has reached a critical mass. Every single mile of motorized route that is open today is extremely important. Further closures will have a larger impact than those in the past. This issue should be brought into the analysis and incorporated into the decision making process.

**Comment:** The second Planning Issue I suggest is "\_trail experience distinct from road experience\_" issue. It is important to recognize the distinction between "trails" and "roads" during this planning process. Providing an arguably adequate road system does not in any way begin to address the demand for motorized single track, full sized 4x4 and ATV trails.

**Comment:** This planning effort should consider keeping all existing roads and trails available for motorized use and should not impose seasonal restrictions on them to the point that they are in effect closed. If off-road travel is curtailed and additional routes are closed to motorized travel, the public is denied reasonable access and it forces higher densities of users on the routes that are available for motorized travel.

The planning should also ensure that appropriate areas are available for off-road travel. An example of such area is Sand Mountain and Warner Valley, which provides a huge amount of recreational opportunity for county residents and visitors alike. It is very important that these areas remain open for use by the public.

The other provision that needs to be provided for is travel off-road to retrieve harvested game animals. This means that if a person harvests an animal (deer for instance), they would be allowed to travel off-road to pick it up and haul it back to the road. This would be easily enforced, because no one could legally be off-road unless they had the animal on the vehicle or were enroute to pick it up. They could not hunt from or with the vehicle.

These allowances are necessary and prudent because everyone is not young and able bodied, or able to hike long distances or carry animals out.

**Comment:** Keep the private property, mine property, travel access; and current status quo, "open" designation in the: Hamburg Peak, Jackson Peak, Jackson Gulch, McFarlane Mountain, Mineral Mountain, Butcher Knife Canyon, Dagget Flat, Miners Canyon, East Fork Beaver Dam Wash, Quail Spring, Goldstrike, Square Top Mountain, area -- under all alternatives of the travel plan amendment. Motorized recreation, private property and mining must be "open" and protected in the amended plan.

The Bureau of Land Management (BLM) scoping mandate of P.L. 111-11., Subtitle "O", of the Omnibus Public Land Management Act of 2009; and specifically the Comprehensive Travel and Transportation Plan of the St. George Field Office, in Washington County.

Congress specifically stipulates the following in the law; "enhanced recreation and general opportunities". This law was passed by a Democratic Congress and president.

Washington County has Zion National Park that is federally protected from motorized recreation; two new National Conservation Area's in Beaver Dam Wash and Red Cliff's federally protected, 14 additions of wilderness areas federally protected and prohibitive to motorized use. Nationally, the federal government owns about 650 million acres. The BLM manages about 255 million acres. There must be "open" opportunities for motorized recreation on the west side of Washington County. Multiple-use and motorized recreation is also a policy perspective and objective of the BLM to manage the federal lands. We believe that an "open" designation under all alternatives would significantly reduce conflicts in the area.

**Comment:** The Bracken Family Living Trust is private property located in Goldstrike, UT, and our firm comments to the BLM are to leave private property travel access on north and south routes, and especially leave remaining in all alternatives the current designation of "open" as a desired condition for the Goldstrike area. Follow the existing "open" boundary in the 1999 current SGFO, BLM Resource Management Plan for Off-Highway Vehicle Designations. We support the status quo designation for the following reasons.

The Bracken family owns 180 acres of private property in Goldstrike and historically has used the land for deer, turkey, and cougar hunting, pine nut harvesting, and motorized recreation. Deer hunting in the region is a part of a quality of life value. This area has good peaks for hunting, especially from East Fork to Dagget Flat. The road from Gunlock through Square Top and Jackson Peak is important to our deer hunt and motorized recreation. Nothing has changed in our desire to use this land in the area as the status quo. Additionally, there are trails and mining that is beneficial to the economics of the county.

In 2005 the area was devastated by two natural disasters, the first was the enormous flood in East Fork Beaver Dam Wash, and the Bull Complex Wildfire in the Summer. The Goldstrike property access must remain open from all the R.S. 2477 routs along the south and the north end of the property to have and maintain an ingress and egress to factor in public safety. This road connects to the Dagget Flat road.

When the goldmine re-opens the property access in some areas to Goldstrike runs through the mine property and is subject to close by the property owner, this must be factored and included in the travel amendment decision. Once a gate on private property closes on the mine, there must be alternative travel routes to access the Bracken property.

**Comment:** I am writing to express support for the 5 SRMA proposals that the Dixie Mountain Bike Trails Association (DMBTA) has provided to you. They are:

Santa Clara River Reserve

Greater Gooseberry

Little Creek

Hurricane Rim

## Red Bluff

**Comment:** Identify through signage and other means manageable off-road vehicle trailheads to ensure that ORV use does not impact the NCAs, ACECs, wilderness areas, or other lands found to possess wilderness characteristics. Close redundant, unnecessary, near or through important cultural sites, and/or ecologically damaging routes within the Beaver Dam Wash and Red Cliffs NCAs to protect sensitive cultural and natural resources, and native plant and animal species, especially the Mojave desert tortoise. Only designate vehicle routes within the NCAs that maintain existing primary access points, and that serve the conservation-focused purposes and needs of the NCAs to avoid or minimize adverse impacts as much as possible. Some NCA routes that should be closed for public use may be designated as limited to administrative uses to enable beneficial conservation actions, such as effective fire fighting and suppression, emergency stabilization and habitat restoration, research, invasive/noxious weed treatments, and law enforcement.

**Comment:** “Recreation zones” should be established consistent with the relevant NCA, ACEC, SRMA, or other management objectives for specific areas. The types and level of recreational uses should be tailored to closely fit with and help achieve these objectives. For example, light or dispersed levels of non-motorized recreational uses should be emphasized in areas with special status species or sensitive resource values, including areas with identified wilderness characteristics.

**Comment:** We request that the BLM provide an adequate and fair evaluation of:

1. The needs of motorized recreationists and the cumulative impacts of motorized closures,
2. All existing routes including those meeting National OHV Rule guidelines and currently closed routes,
3. The current imbalance of non-motorized to motorized trails, and
4. At least one pro-recreation alternative in the analysis.
5. Under the existing condition, too much of the St. George District Office area is set-aside for segregated exclusive non-motorized use for 1% of the visitors to the area. We do not agree with all of the effort that the agency is going through to segregate users. Multiple-use lands

**Comment:** Ten acres have been given by the BLM to Hurricane City for a Park south of the municipal airport. Although funds for this park project may be a long time coming, I know the park would be a big benefit for the residents south of the park.

I am interested in a trail on BLM land along the Hurricane Cliffs foothills that would connect the proposed park and the area below the caves, which are south of Mollie's Nipple on the face of the Hurricane Cliffs.

The caves attract many climbers and the air currents rising from the face of the Hurricane Cliffs attract many power chute and hang gliding enthusiasts to this area. I have noticed that the people enjoying the area trespass through private property to use the area. If a trail were built from the proposed park along the base of the cliffs people could reach the area by going through the proposed park and they could park their vehicles at the park rather than along 1100 west which is rather treacherous. Bikers, walkers and runners would be able to exercise some place other than 1100 West. I have approached Kyle Voles, a cave expert, of the BLM regarding the possibility of this trail. I have not had a response from him. '

BLM land along the base of the cliffs may extend for miles past the location of the caves, however the Hurricane City limits stop at the area of the caves. The possibility of extending the trail south past Hurricane City limits might allow for future extension of the proposed trail. East of the Hurricane Municipal Airport are trails that access Frog Hollow which is a box canyon, and Mollie's Nipple. A trail exists above the cliffs but I do not know if a connection to the trail above the cliffs could be connected to the proposed trail. Depending upon the access to the proposed park and the location of the park there may be a possible connection of the existing trails to the proposed trail along the base of the cliffs and to the park. I have here included a Google map showing the existing trails and the area of the proposed trail.

**Comment:** Map #3 dated 6/14/2010 - Develop the Ranger Bart Trail into an SRMA Point of Interest: 1-already designated as an Environmental Sensitive area due to Holmgren Milk Vetch; 2-Indian pits located in the area; 3-Borders the Virgin River; 4-Several interesting sink holes; 5-Interesting bluffs and other geological features; 6-Restrict off-road use & provide enforcement. GPS Points: Ranger Bart Trail Head - N37 01.300 W113 38.294; Indian pits - N37 01.299 W113 38.352; Holmgren Milk Vetch - N37 01.300 @113 38.294

**Comment:** Cave wash is a dangerous place to ride a bike as men often set shooting targets in the wash bottom and target shoot up or down the wash along which the trail currently runs. An alternate single track out of the wash bottom where the men shoot would be fantastic.

**Comment:** Maintain current mountain bike system for preferred use and current levels of experience.

**Comment:** Find opportunities for more beginner & intermediate mtb trails near communities.

**Comment:** Shooting/mountain bike conflict along access road to Barrel Roll from Santa Clara and in Cave Wash both N and S of area. Shooters need an area to shoot at things other than mountain bikers.

**Comment:** Ranger Bart trail should be SRMA.

**Comment:** I would like maps available to citizens to use & carry along while riding or hiking.

**Comment:** 3. Hikers, ORV users, equestrian users, mt. bikers can "adopt" trails & areas to maintain (like the highways). Stewardship & ownership as citizens.

**Comment:** The Red Cliffs Desert Reserve (RCDR) was set aside as mitigation to offset development of 12,264 acres of tortoise habitat and take of 1,169 desert tortoises. The main goal of the RCDR is to maintain a viable population of tortoises. The Washington County Habitat Conservation Plan specifically states that, within the RCDR, uses will be carefully controlled and all management actions will place the desert tortoise as the highest priority. The Division of Wildlife Resources encourages the BLM to continue to place the protection of the desert tortoise and its habitat as the highest priority throughout this planning process. To accomplish this goal, the Division of Wildlife Resources suggests the following actions:

- I. Continue to limit recreation use to designated trails within the lowland zone in order to minimize degradation and loss of tortoise habitat.
2. Continue the enforcement of recreation restrictions that protect the RCDR.
3. Continue to limit OHV travel to designated roads within the National Conservation Areas.

4. Encourage grazing practices that prevent further tortoise habitat degradation with the NCAs. The Division of Wildlife Resources notes that the tortoises have lost a substantial portion of their habitat due to recent wildfires and dominance of invasive species within the areas.

**Comment:** To minimize conflicts between motorized and non-motorized users, and also between motorized use and resources, BLM should adopt a zone system, much like that adopted by the Grand Staircase-Escalante National Monument (i.e., frontcountry, passage, outback, and primitive zones) that channel different uses (motorized and nonmotorized) into different places. Adopting a zone system will help ensure that visitors can go to areas that are specifically zoned for their interests, that adequate recreational opportunities exist for both motorized and non-motorized recreation and that adequately sized areas exist in which to get out of earshot of motorized routes.

**Comment:** BLM should not allow a travel corridor off of designated routes for dispersed camping or other activities. Allowing motorized vehicle use off of designated routes would significantly increase the amount of disturbance caused to sensitive species, soils, habitat, wilderness values, and other resources in Washington County.

**Comment:** SUWA urges BLM to adopt the concept of zoning in its RMP Amendment, including adopting Special Recreation Management Areas (SRMAs) where appropriate. SUWA proposes that the St. George field office, in conjunction with its RMP Amendment, establish the Bull Valley Mountain Undeveloped SRMA. This SRMA would be located in the remote northwest portion of the St. George BLM field office. See Map attached as Exhibit F.

**Comment:** SUWA urges BLM to adopt the concept of Management Zones in its RMP Amendment. SUWA suggests that BLM adopt the same system as that adopted by the Grand Staircase-Escalante National Monument (Monument of GSENM) for the entire St. George field office. This system was developed by BLM, works well in the Monument, and would be easy to implement in Washington County in part because the language and management prescriptions for the different zones have already been developed. Designating Management Zones within the NCAs would also be appropriate.

**Comment:** BLM's should, and is required to, consider ACECs beyond those that meet the description of priority biological areas. BLM should thoroughly consider the need for special designations in the lands managed by the St. George Field Office, including layering designations that focus on different resources or uses, designating ACECs and SRMAs, and evaluating the need for additional designations within the Beaver Dam Wash and Red Cliffs NCAs. In particular, management of areas for a primitive, backcountry recreation experience, such as in the proposed Bull Valley Undeveloped SRMA, should be prioritized.

**Comment:** BLM should designate the management zones as proposed above to help guide the comprehensive travel and transportation management process, as well as other management decisions and prescriptions in the RMPs and RMP Amendment.

**Comment:** BLM should address travel management on a landscape-level by evaluating the impacts of all roads in the planning area and tailoring its management prescriptions to account for and mitigate the landscape-wide impacts of these roads in conjunction with the objectives of the RMP.

**Comment:** BLM should address travel management on a landscape-level by evaluating the impacts of all roads in the planning area and tailoring its management prescriptions to account for and mitigate the landscape-wide impacts of these roads in conjunction with the objectives of the RMP.

**Comment:** BLM should neither make determinations regarding R.S. 2477 claims as part of this planning process nor permit those assertions to influence its decisions regarding permitting motorized use. The

BLM is legally obligated to identify and protect the many natural resources found in the public lands under its management, including wildlife habitat, scenic values, cultural resources, and recreation opportunities, and to avoid unnecessary or undue degradation of these resources. 43 U.S.C. § 1701 et seq. Similar considerations are required when the BLM assesses whether to permit motorized use of areas or routes. 43 C.F.R. § 8342.1. The agency must adhere to applicable laws and policies while conducting travel planning, and must forego any approach that could lead to a legally-questionable validation of R.S. 2477 rights-of-way claims.

**Comment:** The preservation of natural soundscapes is important to provide visitors with adequate opportunities for quiet recreation. The USGS finds that dissatisfaction with recreational opportunities can “diminish public support for land-management programs” (Ouren 2007). We encourage BLM to utilize the SPreAD-GIS model to analyze and preserve the natural soundscape of the planning area, especially in special management areas managed for quiet use recreation.

**Comment:** Gunlock: the area west of the Gunlock road and north of the Shivwits reservation is a huge area that can easily support multiple types of recreation. One area of special interest to equestrians is the slot canyon that runs northwest just below the Gunlock reservoir. That slot canyon is an excellent, non motorized experience for horses and is very unique riding. We currently ride that canyon, exiting to enjoy the desert areas and drop over to Pacoons Springs and back. That loop has been ridden for many years, and the experience of the high desert and low desert areas in addition to the slot canyon make it extremely enjoyable.

**Comment:** Santa Clara residents want a place to shoot and ride OHV. Historically, riding and shooting areas have been moved to be replaced by bike riding and hiking. BLM should designate on site, signage, kiosks, etc. trailhead maps, places to shoot and ride OHV. If we do not do this, we are only creating an environment for argument and hostility.

**Comment:** If you would designate hiking SRMAs in proposed wilderness areas, it would promote such use the benefit of young and old.

**Comment:** G. Commercial Adventure Businesses

An increase in commercial outfitters and guides has been noticed as the popularity of Southern Utah recreation opportunities has increased. CDF has become aware that there is discrepancy on how permits for these activities are issued and regulated. we suggest the following management strategies and stipulations be applied uniformly for all BLM permits.

1. All commercial guide services be restricted to designated routes specific to those activities
2. Group limits be applied to all permits, by trail or type uniformly 3. permits be monitored for season and duration to assure any one trail, road, or route is not exceeding its social or biological carrying capacity
- 4- Enforcement against non-permitted outfitters and large groups be increased to prevent un managed impacts
5. All permits practice Leave No Trace (LNT) and Tread Lightly principals

**Comment:** I. General Implementation Best Management Practices

1. The scope and scale of the designated route network should be limited by the fiscal capacity to monitor, enforce, and maintain the network

2. Off-road vehicle maps must indicate open routes, access points, staging areas and access requirements, overall route mileage and density, season(s) of allowable use, and road/route conditions. Maps should also include a narrative plan that details the consequences of illegal off route riding and describe what values should be protected.

3. Routes are designated for appropriate vehicles based on the commensurate level of engineering (e.g. single-tract dirt bike route are not designated for use by four-wheeled off-road vehicles). Design monitoring and enforcement programs to ensure that routes are not illegally converted for use by larger vehicles.

4. BLM must include a protocol for events. BMPS related to OHV events include:

i. OHV event permits shall ensure that the event does not lead to conditions that no longer meet desired ecological conditions. Event participants must be required to use those routes that can sustain such a level of use without leading to an increase in habitat degradation, wildlife displacement, conflict with pedestrians or other vehicle types, etc.

ii. There should be opportunity for public review/comment on the event application, and participation in the monitoring

iii. Require funding either from the agency or event promoter that is sufficient to cover permit approval costs, event monitoring event enforcement, and post-event reclamation.

A bond sufficient to cover the costs described should be posted prior to the event. Such bond shall remain in place until post event reclamation has restored habitat, wildlife, and other uses to their desired condition.

iv. OHV event participants should only be allowed to camp in pre-determined or designated motorized campsites.

v. Post OHV event restoration that required actions on the ground shall be completed within six months of the event or sooner if seasonal conditions require immediate action.

vi. Carry capacity of a trail need to be considered in the event with specific limits of participants per trail.

vii. ORV events should have agency monitoring and enforcement staff in the field for the entire event. All monitoring and enforcement records shall be open to public review no later than one month after the event

**Comment:** |. General Monitoring using Best Management Practices

1. Tier ORV use to the available monitoring capacity (funding and staffing).

2. Establish protocols for citizen (including ORV users) monitoring of motor vehicle use, conditions of roads/routes, and associated adaptive management to address identified problems.

3, BLM should host a web site so the public can get accurate maps of trails and narratives on values to be protected. It could also be used to alert BLM to conflicts. Make monitoring data, Geographic information Systems (GIS) data and analysis (in a format that is useable and easily manipulated) readily available to the public on-line.

4. Assess documented user-conflicts to identify trends or trouble areas where management should be reviewed. Implement adaptive management in response to monitoring results including closures, restoration a maintenance etc.

**Comment:** CDF recommends a comprehensive monitoring program be implemented with a standard of thresholds and trigger-points or limits to allow for spectrum of management actions, from increased signage to closures, of areas, roads or trails.

1. The following BMPS monitoring measures are the minimum, and should be recorded or measured annually, they include:

i. Document the creation of renegade route, unauthorized cross country travel or off-route trespass, and the ecological and economic impacts of such illegal actions.

ii. Monitor for impacts of ORV related camping. Monitor designated motorized campsites to ensure they are not increasing in size and that new dispersed motorized camp sites are not being illegally created.

iii. Monitor system route for widening braiding and creation of parallel routes or creation of renegade routes.

iv. Monitor whether signs and barriers prohibiting travel are abided by or ignored, and whether signs and barriers are vandalized, destroyed, or removed.

v. Monitor success of restoration projects and ecological recovery efforts along newly closed routes.

vi. Monitor for change in condition of routes over time and resulting impacts (or enhancements).

vii. Monitor for amount and change in motorized use, and wildlife use, along routes over time.

**Comment:** E. Sand Mountain SRMA

In looking more closely at the Sand Mountain Special Recreational Management Area (SRMA) leaving areas as Open is not appropriate. Sand Mountain's 40,000 acres are designated as Open and should be changed to protect the Gila Monster and chuckwalla habitat area in Warner Valley. The Open area should be revisited by BLM and the size of the Sand Mountain SMRA should be reduced. Scenic resources should all be protected such as the west and south steep red cliff sides in Warner Valley from motorcycles racing up the sides.

BLM needs to coordinate with Utah state Parks on management. They have two recommendations that conflict with BLM having the whole area as open, they include:

Division of Utah State Parks and Recreation draft RMP December 2009, on Page 3, states there should be non-motorized trail opportunities at sand Hollow Recreation Area which include SRMA.

DNR web site: OHV TRANSPORT: Riding from the Westside campground to the dunes is PROHIBITED; machines must be transported by trailer to the OHV staging area. You may, however, ride directly from the Sand Pit Campground to the dunes.

**Comment:** CDF is nominating six areas for SRMA status:

Greater Gooseberry SRMA ( see SRMA Greater gooseberry Map Exhibit "1")

Hurricane Rim SRMA (see SRMA Hurricane Rim Map Exhibit "2")

Little Creek SRMA (see SRMA Little Creek Map Exhibit "3")

Lower Virgin-Atkinville SRMA and Expanded ACEC (see SRMA Lower Virgin-Atkinville Map Exhibit "4") Expand virgin River Lower ACEC

Red Bluff SRMA (see Red Bluff Map Exhibit "5")

Santa Clara Reserve SRMA (see SRMA Santa Clara Reserve Map Exhibit "6")

## SPECIAL DESIGNATIONS

**Comment:** Areas which are restricted (wilderness, etc.) are time bombs waiting to explode. Review the New Harmony fire disaster. Overgrowth creates a dead environment - it's a matter of use it (manage) or lose it!

**Comment:** Consider new ACEC's for the Virgin River & Santa Clara riparian areas.

**Comment:** The Mail Drop - Shunes Hollow - historic spot. I have been going to this spot and Caanan Mountain since the mid '60s & '70s. The history of this spot was not followed up before the wilderness crusade was passed. This is an unfortunate boundary that now limits only healthy adults & children to walk this far, 1.8 mile + in soft sand. We volunteered to install 2" steel posts in ground 3" drilled holes in the sandstone at the base of the wash. These posts would have welded steel rails between the posts - 2 rows & painted. This would allow handicapped & very young people plus hundreds of others to visit this touching historic spot. Please open it up & we will do the work. Refer to mail drop history by Dale B\_\_\_.

**Comment:** You have closed all of the Mail Drop trail except for "about" 1.8 miles round trip that people will have to hike in on. Most people can't hike 1.8 miles in 6" of soft sand. Open up the trail all the way & "we" will put up an iron post block so they can't go up the last part of the trail, where you see the "Drop." I have written a Mail Drop history & will be glad to share. The trail has been there since the 1800's. This trail is the most popular trail in the Elephant Gap area.

**Comment:** I consider it a travesty to close down motorized access to Canaan Mtn. This is one of the most beautiful places on the planet and now most folks will not be able to enjoy it. Only a handful of able-bodied hikers will go to this area. This is a shame and should be reconsidered by Congress.

**Comment:** I would really like to understand the wilderness study area on Canaan Mtn. I think that the trail out on Canaan should remain open. There is a lot of history on that mountain. I would like to see the Sawmill Trail remain open to OHV usage. Also there are many side roads used for hunting on that mountain. They also need to remain open. The other main trail is the Mail Drop. This trail also needs to remain open. I think we need to map all the roads and trails that are in use now and get them on a map so people can use them for any type of recreation.

**Comment:** Silver Reef area should remain open to travel on designated roads/trails. This is a great area to explore with awesome Utah mining history. Grafton & Wire Mesa area is great to explore with the family. I'd hope that whole surrounding area of Canaan Mtn. remains open.

**Comment:** Cherry stem on Canaan Search & Rescue administration route. Mail Drop cherry stem. All routes should be part of High Desert trails.

**Comment:** ACEC's (Areas of Critical Environmental Concern)

We oppose the creation of any new ACEC's. The management philosophy in these areas appears to be a back door approach to creating new areas managed as wilderness without the appropriate process of actually designating them as wilderness. We feel that with the existing designated wilderness areas, along with the existing conservation areas there is already enough land in Washington County being closed off to motorized use.

**Comment:** BLM should inventory the lands in Washington County under its jurisdiction for wilderness character, and should manage those lands found to have that character so as not to impair it.

**Comment:** The NCAs should be managed for Conservation values (the "C"! ) rather than recreation. This means that off-highway vehicle (OHV) use should be restricted so that it does not those areas with wilderness character or lands in the NCAs. These restrictions should include outright prohibition in lands with wilderness character and lands included in the Red Rock Wilderness Act.

**Comment:** In addition, BLM should close OHV routes that do not lead anywhere and are duplicative. And in general, motorized routes that ARE designated in NCAs should serve a conservation purpose. Domestic livestock grazing should be phased out as soon as possible in both NCAs.

**Comment:** BLM should evaluate all rivers and streams in the planning area for eligibility for inclusion in the Wild & Scenic River System.

**Comment:** We support proposals to create a Zion Scenic Corridor Area of Critical Environmental Concern (ACEC) along Highway 9 West of Zion National Park, as well as a Virgin River ACEC to protect the riparian habitat of that river.

**Comment:** I am writing to urge the BLM to conduct a wilderness inventory inside areas designated for such protection in America's Red Rock Wilderness Act. Such lands not yet protected by Congress do deserve it. Also, I would like to urge BLM to protect these lands by restricting ORV use in these areas. ORVs have hugely significant impact on wilderness values and wildlife.

Please find ways to close unnecessary and ecologically damaging ORV routes in the Beaver Dam Wash and Red Cliffs Conservation Areas, the routes that extend into the northeast corners of the Canaan Mountain wilderness and the Red Mountain wilderness areas, and also eliminate domestic livestock grazing to protect the unusually large number of sensitive plant and animal species there, including the desert tortoise.

**Comment:** Also, it would be a good idea to designate "recreation zones" on the public lands in Washington County, and to designate areas proposed for wilderness in America's Red Rock Wilderness Act as primitive zones to restrict ORV use and help these areas keep wilderness characteristics.

**Comment:** One last thing would be to evaluate rivers for Wild and Scenic River status. Many rivers in southwest Utah have "outstandingly remarkable values" and are eligible and suitable as Wild and Scenic Rivers.

**Comment:** ACEC Designations

As part of the Resource Management Plan amendment process, the designation of Areas of Critical Environmental Concern in places with sensitive or threatened biological resources represents an invaluable tool in the BLM's conservation efforts. Riparian corridors, which provide habitat for

approximately 90 percent of wildlife species in Washington County, should be focal zones for ACEC designation.

I strongly support the Virgin River ACEC nomination submitted by the Citizen for Dixie's Future. The Virgin River main stem and tributary floodplains are ribbons of life for aquatic, reptile/amphibian, bird, mammal, and plant species; provide vital corridors for watershed functions and biological cycles; and contain signature scenic landscape features. The Virgin River system supports valuable public uses including water supply, enhancement of water quality through filtration and dilution of runoff, protection from flooding, and outdoor recreation activities and tourism.

ACEC overlays also would benefit the stream corridors of the Santa Clara River and Beaver Dam Wash, placing attention on restoration and protection of riparian, wetland, floodplain, and instream habitat. Land uses such as grazing and recreation can severely impact riparian habitat through erosion and bank destabilization, vegetation degradation, disturbance to nesting birds, introduction of noxious weeds, and other harmful effects, making ACEC designation for these vulnerable, biologically rich areas especially important. Uplands adjacent to these stream corridors should also be considered in the management approach, with areas more prone to erosion being restricted from uses that cause sedimentation and creation of gullies.

The BLM will glean important information and management direction by inventorying and evaluating the conservation needs of listed plant and animal species, and acting upon the biological information and ACEC recommendations presented by scientists and knowledgeable stakeholders (including the Utah Native Plant Society and Utah Division of Wildlife Resources biologists working on conservation of the desert tortoise).

**Comment:** The Act calls for additional ACES's areas to be established. Studies and master plans are underway to establish the highway into Zion National Park as a National Scenic Highway. It would be very appropriate if this scoping process became engaged in that planning with the possibility of nominating ACES's with the main purpose of protection the National scenic treasures along this highway. I also feel strongly that these scenic lands exist throughout our area and that this opportunity should not be lost to protect them as well.

**Comment:** Identification and Protection of Areas Where Biological Conservation is a Priority.

The designation of additional ACEC's should help bring the additional attention and resources necessary to actually protect and prevent irreparable damage to important biological resources in designated areas. It is imperative that adequate funding is available to BLM to implement these activities.

VRLPA nominates the following areas for designation as Areas of Critical Environmental Concern:

A. The Entirety of Virgin River and its Major Tributaries as they cross BLM Managed Lands. BLM manages significant Federally-owned segments of the Virgin River and its major tributaries in Washington County. The outstanding and irreplaceable biological values of these riparian areas are well documented, from fish habitat to a critical resource for other wildlife, not to mention the importance of the river and its tributaries as a resource for clean municipal and agricultural water. Significant ephemeral tributaries are also worthy of protection in our desert ecosystem.

Specific reaches/tributaries include:

The Virgin River:

a. from Virgin Town to the Town of Rockville (Mosquito Cover area is in desperate need of closure to camping and habitat restoration)

b. from Atkinville to the State border Tributaries:

a. Deep Creek

b. Crystal Creek

c. Kolob Creek

d. Dry Creek

e. North Creek

f. LaVerkin Creek

g. Ash Creek

B. Critical Winter Range for Mule Deer, Elk, and Wild Turkey. The Dry Creek and Grapevine Drainages, nestled between Smith Mesa and Zion National Park, provide critical winter range for mule deer, elk, and wild turkey. The Utah Division of Wildlife Resources has mapped these areas and adopted goals and strategies to achieve wildlife management objectives including the following example for mule deer:

Habitat Goal: Conserve and improve mule deer habitat throughout the state with emphasis on critical mule deer ranges. Habitat Objective 1. Maintain mule deer habitat throughout the state by protecting existing critical habitats and mitigating for losses due to human impacts.

Implications: Loss of critical mule deer habitat will need to be minimized to achieve population objectives. Mitigation is essential for loss or degradation of all critical habitats due to human impacts. Strategies:

- Identify and characterize critical mule deer habitats throughout the state.
- Work with land management agencies and private landowners to recognize and properly manage critical mule deer habitats, especially fawning and wintering areas. [emphasis added]
- Minimize human disturbance in existing critical mule deer habitats.

C. Habitat for Threatened and Endangered Plants. The rolling clay hills south of Webb Hill have been fenced as a reserve for Dwarf Bear Claw Poppy, field office resources have not been able to adequately monitor and protect this area. A few other areas, such as Warner Valley and White Reef/Leeds Creek area have scattered populations of sensitive plant/animal species similarly worthy of additional protection.

**Comment:** Restrict ORV use in the lands proposed for wilderness designation but not yet protected by congress.

Conduct a wilderness inventory of the lands proposed for wilderness designation in the America's Red Rock Wilderness Act.

**Comment:** I live in Washington County and am glad to have this natural habitat so close to my home. However, I am concerned with the frequent ATVs driving around, gunshots in signs, and for my safety when I am alone hiking in this area. Why does this area need to be developed further? Shouldn't we have ANY lands that can remain as they are???

Why can't the natural wildlife habitat continue to roam freely in this area? My idea of the BLM is to protect the public lands – not waste them. Why can't there be “primitive zones” in areas to restrict off-road vehicle travel, protect sensitive species, and ensure that these areas retain their wilderness character? I also don't think these lands should be available for grazing cows and more pollution from methane gases. We don't need any more roads in these areas. The ones that already exist should remain primitive. Have you ever been out to Canyon lands or Arches or Death Valley? These are by far the best of the national parks because they have remained “rather” undeveloped (unlike the South Rim of the Grand Canyon and Yosemite Valley). Here in southern Utah, I like so many other people, came to escape the city. Do not ruin these public lands for people like us who use them with no impact.

I support conservation of Beaver Dam Wash and Red Cliffs NCAs to protect the sensitive, plants, animals and other resources in Washington County.

**Comment:** We often ride in the Hurricane Sand Dunes area. We are very interested in having this area accessible for riding for years to come. We are opposed to the creation of ACECs in any areas. We also prefer to have the areas in question continue to be managed by the BLM and not the state parks such as Sand Hollow State Park.

**Comment:** I strongly encourage the Bureau of Land Management (BLM) to conduct a wilderness inventory of the lands proposed for wilderness designation in America's Red Rock Wilderness Act (ARRWA) that have not yet been protected by Congress. The preservation of the wild canyons of Utah is very important to me. Whenever I return to Utah, I look forward to exploring its rivers and canyons. I would be extremely disappointed to return to a favorite wild and scenic area, only to find that it has been “developed.”

**Comment:** Please manage Water and Short Canyons on the south side of Canaan Mountain for non-motorized use. These canyons are proposed for wilderness in ARRWA and are not appropriate places for ORV use. The BLM should also close both of the routes that extend into the northeast corners of the Canaan Mountain wilderness and the Red Mountain wilderness areas because they are incompatible with the wilderness values of the areas. And please close, or limit to non-public administrative use only, the routes in the Designated Road area of the Beaver Dam Wash NCA in order to protect fragile habitat for the desert tortoise and other sensitive species.

**Comment:** I encourage the BLM to designate “recreation zones” on the public lands in Washington County. Areas proposed for wilderness in ARRWA should be designated as “primitive zones.” This designation will restrict off-road vehicle travel, protect sensitive species, and ensure that these areas retain their wilderness character. And Special Recreation Management Areas (SRMAs) should be designated on the public lands in Washington County, including backcountry hiking SRMAs in areas proposed for wilderness but not included in the Omnibus legislation. And please evaluate river segments for potential Wild and Scenic River status.

**Comment:** My main comment is to carry forward the conservation mandate of these NCAs: “The Congressionally-defined purposes of the new NCAs are: to conserve, protect, and enhance for the benefit and enjoyment of present and future generations the ecological, scenic, wildlife, recreational, cultural, historical, natural, educational, and scientific resources of each unit.” Given that there is proposed wilderness (under the America's Red Rocks Wilderness Act proposal) in each of the NCAs, I believe that stewarding the qualities that potentially qualify these areas for wilderness is an important priority.

There are several management approaches that I would like to see the BLM implement to help protect unique, biologically sensitive resources in the NCAs. One is to create backcountry hiking recreation zones in the areas where proposed wilderness overlaps with the NCAs. Another is to limit roads and motorized

uses in the NCAs, especially in ecologically sensitive areas and those lands proposed for wilderness designation. And finally, I urge the BLM to dismiss the Northern Transportation Corridor option that passes through the Red Cliffs NCA. This would compromise the entire area, and undermine the conservation effort. Please advocate for the expansion of the Redhills Parkway, instead.

**Comment:** The effects of ATV/ORV public lands damage ties into my concern about the effects of livestock grazing on public lands where their movement seems to be tied to the invasion of problematic vegetation such as cheatgrass. It seems essential that BLM look into this matter carefully when working the RMP specifics and determine if livestock grazing on BLM lands is in the best interest of preserving these important areas from the expansive wildfires that can be created by cheatgrass. It makes economical sense and biological sense to review and revise the grazing policy. Current fees to those who graze their animals don't seem to be keeping up with the problems created. Of particular concern are areas that are established as ACECs. There will probably be strong political pressure to continue with the status quo, but as time passes and the effects of grazing are determined and analyzed scientifically, those who benefit from these grazing privileges should be educated to understand the need for change. This has been a concern for a while and changes in the system should not be deferred any longer. It is particularly offensive the fee for the grazing is so low and does not serve to support the management of these lands on which some benefit economically at the expense of others. There's been a recent president's directive that recommends reforming or eliminating the money-losing, habitat-destroying public lands livestock grazing program.

**Comment:** Potential wilderness areas in Washington county that are cited in the America's Red Rock Wilderness Area bill should formally studied for whether they meet WSA standards. Until this process is complete, the need careful protection from Off Road Vehicles.

**Comment:** Beyond the new wilderness areas and NCAs preserved by the Omnibus Public Lands Management Act of 2009, there remain many areas proposed in America's Red Rock Wilderness Act (ARRWA) that require further protection. These outstanding natural areas must not be irreparably damaged by careless management before their character is known. I urge the BLM to conduct a wilderness inventory these lands to determine their status and protect areas consistent with wilderness values as Wilderness Study Areas.

**Comment:** Off-road vehicle (ORV) use is the greatest threat to wilderness values. I urge the BLM to restrict ORV use from the areas proposed in ARRWA. There is simply no need for further ORV routes in Utah. Over 74%-- 17 million out of 24 million acres—of public land in Utah is unprotected from ORV use, and there are over 100,000 miles of ORV routes in Utah. ORVs damage vegetation and disturb rare desert wildlife. They also destroy peaceful wilderness values for other users with their excessive noise and dust creation. ORVs can also disturb priceless archaeological or paleontological treasures yet to be inventoried and studied.

**Comment:** Water and Short Canyons on the south side of Canaan Mountain should be managed as non-motorized areas. These canyons are identified in ARRWA, and these delicate places are inappropriate for ORV use. The BLM should also close both of the routes that extend into the northeast corners of the Canaan Mountain wilderness and the Red Mountain wilderness areas because they are incompatible with the wilderness values of the areas.

**Comment:** If the BLM does decide to allow the use of damaging ORVs in the areas identified in Washington County for protection under ARRWA, I urge the BLM to identify manageable and clearly-marked ORV trailheads and routes to ensure that ORV use does not threaten the natural values of NCAs, wilderness areas, or other lands proposed for wilderness in ARRWA.

**Comment:** Special Recreation Management Areas (SRMAs) are another way to zone various uses into specific areas. In areas that are identified in ARRWA, the BLM should designate backcountry hiking SRMAs to preserve the wilderness values in these areas.

**Comment:** The BLM should inventory and identify river segments in Washington County that meet the requirements for Wild and/or Scenic designation. Many river segments in Washington County meet these requirements and should be protected for the future. With such outstanding rivers throughout the state, it is a shame that only portions of the Virgin River have been designated under the Wild and Scenic Rivers Act.

**Comment:** Areas of Critical Environmental Concern. This is just another way of saying wilderness and getting around the law. All WSA's and ACEC's should be deleted, grandfathered out or not considered at all.

**Comment:** Conduct a wilderness inventory of the lands proposed for wilderness designation in America's Red Rock Wilderness Act (ARRWA) that have not yet been protected by Congress. Protect the lands proposed for wilderness designation in ARRWA but not yet protected by Congress by restricting ORV use in these areas. ORVs have a significant impact on wilderness values and wildlife, and ORV routes fragment wildlife habitat and entire ecosystems. Identify manageable off-road vehicle trailheads to ensure that ORV use does not impact the NCAs, wilderness areas, or other lands proposed for wilderness in ARRWA. Close redundant, unnecessary, and ecologically damaging routes within the Beaver Dam Wash and Red Cliffs NCAs in order to protect the multitude of sensitive plant and animal species there, including the desert tortoise.

**Comment:** Manage Water and Short Canyons on the south side of Canaan Mountain for non-motorized use. These canyons are proposed for wilderness in ARRWA and are not appropriate places for ORV use. Close both of the routes that extend into the northeast corners of the Canaan Mountain wilderness and the Red Mountain wilderness areas because they are incompatible with the wilderness values of the areas. Close, or limit to non-public administrative use only, the routes in the Designated Road area of the Beaver Dam Wash NCA in order to protect fragile habitat for the desert tortoise and other sensitive species.

**Comment:** Evaluate river segments for potential Wild and Scenic River status.

**Comment:** Another overview comment relates to BLM's use of possible new or expanded Area of Critical Environmental Concern (ACEC) designations to fulfill the new statutory objective to better identify and protect priority ecological resources. Such designations are indeed an important tool, and the actual land use restrictions decided upon to achieve the purposes of those designations are crucial. Adding an ACEC polygon to a map does little; it is the decisions tied to the designation, and their adequate implementation, which are the keys to an ACEC's success. In addition, there are other management tools to achieve this new statutory objective.

For example, allowing continued livestock grazing in an ACEC established to protect riparian habitats and associated special status species may greatly weaken or undermine the basic integrity of that ACEC. The same may be said about an upland ACEC or NCA established, in whole or in part, to protect Mojave desert tortoises or other special status species. This is due to the link between livestock grazing, breaking up of cyptobiotic soil crusts, higher densities of cheatgrass, and the associated increased risk of more devastating habitat-converting fires. I realize that there may be strong political pressures to retain historic livestock grazing uses. However, BLM is obligated to follow the law and best available scientific information which I believe means that some meaningful management changes are reasonable, necessary, and even long overdue. Since decisions on whether existing BLM livestock grazing allotments should remain available or become unavailable for continued grazing can only properly be made during an RMP

revision process, I recommend that the current Dixie RMP revision process include the fresh consideration of those decisions. The longer this consideration may be deferred or postponed, the worse damage that may occur, whether to riparian or upland habitats and associated special status species.

**Comment:** I trust that the BLM SGFO will give strong weight to any recommendations from the “experts” on subjects like landscape ecology, conservation biology, and metapopulation dynamics (especially of special status species). Many of these experts are likely to work for or represent FWS, the Utah Division of Wildlife Resources, or The Nature Conservancy (TNC). This expert knowledge and opinion should play a major role in helping the BLM SGFO to develop not only sound proposed ACEC designations, but also the purposes and decisions to ensure that those ACECs will be successful. Experts can also help with recommendations on other proposed decisions, such as on desired future conditions, resource allocations, route designations, and livestock grazing limits and allotments. In addition, I strongly recommend that any and all relevant conservation “gap analysis” data and recommendations be carefully integrated into these planning processes.

**Comment:** I also support and recommend that the BLM SGFO develop a proposed Zion Scenic Corridor ACEC to maintain and protect the world-class scenic quality of Highway 9 as it winds west of Zion National Park. This scenic byway is appreciated by visitors from around the nation and the world. Similarly, and in addition to this proposed ACEC, BLM should consider restrictive Visual Resource Management (VRM) decisions to complement the ACEC and ensure protection of the undeveloped BLM lands that comprise the byway’s viewshed.

**Comment:** In addition, if there are any important Mojave desert tortoise habitats outside of the NCAs, and consistent with the HCP, I recommend that they be considered for strong ACEC designations. Such designations should eliminate livestock grazing (which is an identified threat in the 1994 FWS Mojave desert tortoise recovery plan) and keep roads and trails to the absolute minimum. Roads that are not primary access routes should be considered for limitation to administrative uses only, such as fire fighting and research. In light of documented population declines and expanding habitat loss/fragmentation through fires, development, and other causes, everything that can be done to advance tortoise conservation and recovery should be done.

**Comment:** It is of utmost importance that the BLM protect the lands proposed for wilderness designation in ARROWA but not yet protected by Congress by restricting ORV use in these areas. ORVs have a significant impact on wilderness values and wildlife, and ORV routes fragment wildlife habitat and entire ecosystems.

**Comment:** There are public lands of wilderness character not included in the recent legislation concerning Washington County's 180,000 acres. You should do a cultural survey, design backcountry hiking areas, primitive recreation zones, do a wilderness inventory of proposed lands of ARROWA not yet protected (and restrict ORV use in the areas).

**Comment:** Include a map in the draft plan showing the areas BLM found to have wilderness characteristics. No consideration of wilderness designation is involved, but the information on wilderness values tells decisionmakers something about the resources of the area, and it can help BLM make decisions about appropriate uses in the new plan.

**Comment:** Please protect public lands in Washington from ORV and other inappropriate vehicular access and use. Many of these fragile lands and their waters are worthy of full wilderness protection. Please conduct a wilderness inventory of all those so recommended by the Redrock Wilderness Act.

**Comment:** I strongly urge you to limit /address (destructive) ORV's, expand ACECs & Wilderness Areas!

**Comment:** Areas of Critical Environmental concern "ACEC", National Monuments, National Conservation Areas and Wilderness Areas. Far too much public land has been assigned the above designations. No more public land use should be taken from the people. These land use designations do not add scenic beauty, they do not add any interesting landscape that doesn't already exist, they simply restrict the people's right to use the lands they own. No more ACEC, National Monuments, Wilderness etc. As the population grows the need for recreation use of public lands grows. Do not take the public's right to motorized access away from any more public land.

**Comment:** Can you tell me what river segment is referred to in the following paragraph from the NOI?

**Comment:** I'd like to see more wilderness-quality lands protected, although probably not the full acreage SUWA desires.

**Comment:** Please, manage for wilderness protection where possible and for maximum preservation everywhere else. Restrict vehicular access, off road use, protect critical species, and close roads.

**Comment:** Please designate areas proposed for wilderness in ARRWA as "primitive zones."

**Comment:** Please do not conduct a wilderness inventory of the lands proposed for wilderness designation in America's Red Rock Wilderness Act (ARRWA). We have wilderness enough!

**Comment:** Please do not treat the lands proposed for wilderness designation in ARRWA as wilderness by restricting ORV use in these areas. ORVs do not have a significant impact on wildlife, and ORV routes do not fragment wildlife habitat and entire ecosystems.

**Comment:** Please do not designate Special Recreation Management Areas (SRMAs) on the public lands in Washington County. Please designate backcountry hiking SRMAs in areas proposed for wilderness but not included in the Omnibus legislation. Hiking is allowed currently for anyone.

**Comment:** Please manage Water and Short Canyons on the south side of Canaan Mountain for motorized use. These canyons are proposed for wilderness in ARRWA and are not appropriate for wilderness.

Please do not close both of the routes that extend into the northeast corners of the Canaan Mountain and the Red Mountain areas because they are compatible with trail management objectives.

**Comment:** Please do not evaluate river segments for potential Wild and Scenic River status. It's not needed.

**Comment:** Please do not buy into the "SUWA" request for anyone from anywhere to add "Areas of Critical Environmental Concern" to the management of our public lands as requested below. "If you know of important species habitat, nominate that area as an Area of Critical Environmental Concern. Be sure to look at BLM's ACEC Fact Sheet and comply with the submission requirements."

**Comment:** Likewise, grazing leases in these and other sensitive areas should be withdrawn. Cattle have no place in desert wilderness because they too do grave damage to natural areas.

**Comment:** In your evaluation process, PLEASE PROPOSE ACTIONS TO PROTECT THE SENSITIVE NATURE AND BEAUTY OF WASHINGTON COUNTY'S UNIQUE ECOLOGY. ORV's do not belong in this pristine area of natural beauty.

**Comment:** I write to urge you to plan a protective and ecologically valid plan for the newly designated wilderness areas in Utah. This would be in keeping with the myriad wilderness areas of our country. In the past, you have pandered to special interests that have destroyed land and wilderness quality.

**Comment:** It is essential that BLM craft strong plans worthy of the lands and resources the agency is charged with protecting, as they will set an important precedent for future plans as more of Utah's public lands are officially preserved as wilderness or NCAs.

It is important that BLM emphasize appropriate off-road vehicle routes, the need to protect wildlife and habitat, and suitable management decisions to protect the lands with wilderness character that were not included in the recent legislation.

**Comment:** One of the areas we have enjoyed is the lower Virgin River. Here, although one is quite close to civilization, you can have a wilderness experience. We bring our binoculars and enjoy the birds in this area. This area is unique for its scenery and wildlife. We find that this area is in danger of being permanently ruined by the motorized vehicles that frequent the lower Virgin. The landscape with its fragile desert plants is being torn up. We often encounter the noise and smell from ATVs. For these reasons we urge you to designate this area for non-motorized use only, to increase the current size which is now under the ACEC designation and to redesignate the whole area as a Special Recreation Management Area.

**Comment:** I am writing as a biologist, teacher and citizen to urge the BLM to support conservation of the wilderness areas and NCA's in Washington county. I have taken my university students on field trips to the Beaver Dam Wash area for years. It is a wonderful example of habitats and makes for a productive learning experience. I have also hiked for personal pleasure in many BLM areas across the country. In almost all areas, the vegetation suffers from overgrazing, which reduces its value for wildlife, disturbs sensitive plants and increases dust. Over the years, the impact of ORV has been growing and is increasingly destructive. Please limit these activities and designate areas as primitive. Areas with wilderness value will only become more important for humans in the future, preserving diversity and ecosystem function as well as providing areas for recreation and tourism.

**Comment:** The Lower Virgin River ACEC should be expanded and also designated as an SRMA. It should be preserved for non-motorized recreation. First, I have been a four-wheeler in the past and enjoyed the sport responsibly by staying on developed trails and not destroying the land which the off road vehicle allowed me to enjoy. Most of the off road vehicle users are responsible, courteous, and respect the rules which protect our environment, however, there are the few (and that is all it takes) that feel that the thrill of 'testing' their machine and riding ability by going up steep hills in the process destroying plant life, (endangered or common) and permanently scarring the fragile desert land.

**Comment:** Shortly after moving to the St. George area in 2005, we discovered the area currently known as the Lower Virgin River ACEC. We have marveled at the ancient pithouses, the desert plants and wildlife, and sought to learn more about the complex geology of the area. At the same time, we have seen more and more ATV trails crisscrossing the area and noted what seems to be an increasing use of the area for target shooting and other sorts of firearms recreation (an endangerment to us and others seeking to appreciate this stretch of desert). We feel that it is imperative to provide more protection for an area so rich in natural and cultural resources (including remnants of the southwest's ranching heritage). We urge the BLM to give serious consideration to the proposal to create a new SRMA in this area and hope that

BLM representatives will go out and see for themselves the extent of the damage being done, if they have not already done so.

**Comment:** As a representative of the Outback Hiking Club of Southern Utah, I have been authorized to report that the proposal to enlarge the Lower Virgin River ACEC and redesignate it an SRMA has the backing of the club (a group currently consisting of 268 members, almost all of whom are residents of southern Utah).

**Comment:** I am writing you to urge you to keep the wilderness areas in Washington County just that - wilderness. Lands such as these provide not only beauty for the landscape. They also provide habitat for many species of animals, which in this time of climate change desperately need all the habitat help they can get. Once again, I urge you to keep the Washington County wilderness areas wilderness.

**Comment:** So many of our public lands, forests, and open spaces have already been ruined by development, drilling, OTV/ATV use, and roads! Enough is enough! Our wilderness, forests, and public lands are under threat from so many angles. They desperately need to be protected. Our parks and forests are supposed to be a place of peace and quiet, for us and for the animals who live there. PLEASE let our public lands stay as beautiful and peaceful as Mother Nature intended!! Their future is in your hands! PLEASE help save the wilderness for ALL future generations!! Although the Washington County Growth and Conservation Act of 2009 protected much of Utah's Zion-Mojave wilderness and SUWA supported the bill's final passage, this legislation was not perfect. Some deserving lands were left unprotected, including Dry Creek, Square Top, Butcher Knife Canyon, and the Beaver Dam Mountains. With our Utah Wilderness Coalition partners and congressional champions, we fought hard to improve the Washington County bill. Because it was a fight to the end, there was never any stated agreement between wilderness advocates and the bill's proponents. As a result the proposed wilderness lands omitted from the Washington County legislation remain in Congressman Hinchey's America's Red Rock Wilderness Act (ARRWA). And we need your help to keep these lands wild. PLEASE protect proposed wilderness areas omitted from the Washington County bill, such as Dry Creek and the Beaver Dam Mountains!!!

**Comment:** Recommended Changes to Existing Areas of Critical Environmental Concern

#### Beaver Dam Slope

1) We recommend BLM include the Virgin spinedace in the Beaver Dam Wash portion of the existing Beaver Dam Wash ACEC. The wash, including the associated riparian vegetation provides important habitat for the Virgin spinedace, a conservation agreement species. For Virgin spinedace, we recommend removal of grazing and keeping off-road vehicle use out of the wash area.

2) We also recommend this ACEC be expanded to include occupied desert tortoise habitat in the U.S. Fish and Wildlife Service designated critical habitat, to the north. The status of the Mojave desert tortoise, since listed as threatened under the Endangered Species Act in 1990, has not improved. Furthermore, the number and magnitude of impacts to the species and their habitat have intensified. For example, a large area of critical habitat north of the existing ACEC burned in 2005. Based on the desert tortoise's status and the threat of fires, we recommend the Beaver Dam Slope ACEC be expanded northward to include the remaining desert tortoise critical habitat. This special designation will focus the necessary resources toward rehabilitating the area and contributing to the recovery of the desert tortoise within the recovery unit. In keeping with desert tortoise rehabilitation and recovery goals, we recommend all grazing be removed from the Beaver Dam Slope ACEC and our recommended ACEC expansion area, unless research data demonstrates that grazing has a net benefit for the desert tortoise.

3) We recommend the gila monster (*Heloderma suspectum*) be added to Beaver Dam Slope ACEC. Gila monsters are a state sensitive species and we recently received a petition to list the gila monster under the Endangered Species Act. We are reviewing this petition and expect to publish a 90-day finding later this year.

**Comment:** Lower Virgin River

We recommend that this ACEC be expanded to include Holmgren milkvetch (*Astragalus holmgreniorum*) critical habitat in the area (State Line subunit). We recommend the area be managed as follows:

- a) no surface occupancy for fluid minerals leases;
- b) closed to fuelwood collection;
- c) closed to mineral material sales;
- d) right-of-way (ROW) avoidance;
- e) withdrawal from mineral entry;
- f) no motor travel outside designated roads and trails;
- g) grazing removal;
- h) no additional horse or bike trails.

In addition, we recommend annual monitoring of Holmgren milkvetch to identify and manage disturbances to the plants or habitat.

**Comment:** Red Bluff

1) We recommend expanding this ACEC to include Holmgren milkvetch (*Astragalus holmgreniorum*) critical habitat (Stucki Spring and South Hill subunit) and dwarf bear claw poppy (*Arctomecon humilis*) habitat to the north and northwest of the current Red Bluff ACEC boundary. Holmgren milkvetch and dwarf bear claw poppy are listed as endangered under the Endangered Species Act. Both these species are already rare species with face increasing threat of adverse impacts as a result of increasing human populations. Additional management is necessary to conserve these species and their habitats. Our management recommendations include:

- a) no surface occupancy for fluid minerals leases;
- b) closed to fuelwood collection;
- c) closed to mineral material sales;
- d) right-of-way (ROW) avoidance;
- e) withdrawal from mineral entry;
- f) no motor travel outside designated roads and trails;
- g) grazing removal;

h) no additional horse or bike trails.

In addition, we recommend BLM conduct annual monitoring of Holmgren milkvetch and dwarf bear claw poppy to identify and manage disturbances to the plants or their habitats.

2) We also recommend the ACEC include gila monster (*Heloderma suspectum*) and Mojave desert tortoise (*Gopherus agassizii*) to the species with focused conservation management. Gila monsters are a state-sensitive species and we recently received a petition to list the gila monster under the Endangered Species Act. Desert tortoises have been listed as threatened under the Endangered Species Act since 1990.

**Comment:** Upper Beaver Dam Wash

We recommend the current ACEC include Virgin spinedace and migratory birds. Portions of the wash managed by BLM have historically contained Virgin spinedace, a state sensitive species managed under the Virgin Spinedace Conservation Agreement and Strategy (Addley and Hardy 1993). In addition, this area has the potential to provide riparian habitat that is important to migratory birds. An ACEC designation could protect upstream portions of the Beaver Dam Wash watershed which would assist with maintaining adequate water quality and quantity (via infiltration and groundwater management) in downstream reaches of the creek. We recommend BLM protect the riparian area by excluding grazing.

For the southwestern willow flycatcher, we recommend the following management:

The southwestern willow flycatcher requires relatively dense growths of trees and shrubs, near or adjacent to surface water or underlain by saturated soil; nest sites typically have a dense canopy where trees and shrubs range in height from 2 m to 30 m (6 to 98 ft) (70 FR 60886, October 19, 1995). Management prescriptions that maintain and enhance riparian vegetation, provide adequate canopy cover, and preserve surface water or saturated soils will benefit the southwestern willow flycatcher. A healthy riparian system will also benefit other avian species like the yellow-billed cuckoo, yellow-breasted chat, and yellow warbler. Some species, like the yellow-billed cuckoo, require large cottonwood galleries with a dense understory for nesting (66 FR 38611, July 25, 2001), while other species like the yellow warbler prefer disturbed and early successional habitats (Lowther et al. 1999). Along the entire length of the Beaver Dam Wash, the riparian habitat should include various successional stages to provide habitat for a variety of species and to provide continual replacement of habitat as old, decadent trees and shrubs die or vegetation is removed by natural processes like floods. Because of the natural constraints in the Wash, it might not be possible to provide a large block of habitat for breeding yellow-billed cuckoo, but the Wash might still provide important migratory habitat for this species. To achieve a healthy riparian ecosystem along Beaver Dam Wash:

a) Over-grazing by livestock can seriously degrade riparian systems (Sutter et al. 2005); therefore, we recommend you keep livestock out of riparian habitat by fencing key areas.

b) Under certain conditions, carefully prescribed grazing can be a useful tool to manage wildlife habitat (Leopold 1933) and could be used to help combat the spread of invasive species, particularly in upland areas. As practicable, we recommend you remove grazing from Beaver Dam Wash.

c) Improper and unchecked OHV use results in the direct loss and fragmentation of riparian habitat (Sutter et al. 2005); therefore, we recommend you remove OHV use from Beaver Dam Wash and strictly enforce OHV regulations.

d) Energy development can result in the direct loss and fragmentation of riparian habitat (Sutter et al. 2005). Increased sedimentation, noise, and human disturbance associated with well pads, roads, wind

turbines, powerlines and other infrastructure can impact riparian habitat and wildlife. We recommend you exclude energy development within or adjacent to Beaver Dam Wash.

e) Keeping water in the Beaver Dam Wash will help maintain riparian vegetation. (We recommend you) Do not permit additional diversions from Beaver Dam Wash and work with the Utah Division of Wildlife Resources to secure in-stream flows.

f) Restore degraded riparian habitat along Beaver Dam Wash will benefit migratory birds and should benefit fish as well. We recommend you work with partners and the Virgin River Recovery Program to identify areas that could be improved to provide nesting habitat for the southwestern willow flycatcher.

**Comment:** Recommendations for New Areas of Critical Environmental Concern Designations

Zion Park/BLM Boundary

Due to the recent discovery of a new Shivwits milkvetch (*Astragalus ampullarioides*) population, we recommend/nominate all suitable Shivwits milkvetch habitat west of the Zion NP boundary within Township 41 South, Range 11 West, Section 5 and 8 as a new ACEC for Shivwits milkvetch. Shivwits milkvetch is federally listed as endangered under the Endangered Species Act. Due to the rarity and unique habitat requirements of this species and specific habitat requirements, it is important for the conservation of the species that BLM manage its known habitats beneficially. Therefore, we recommend the ACEC be managed consistent with the maintenance and recovery of the existing Shivwits milkvetch plants and their habitats. Our management recommendations include:

- a) no surface occupancy for fluid minerals leases;
- b) closed to fuelwood collection;
- c) closed to mineral material sales;
- d) right-of-way (ROW) avoidance;
- e) withdrawal from mineral entry;
- f) no motor travel outside designated roads and trails;
- g) grazing removal;
- h) no additional horse or bike trails.

We recommend BLM conduct annual monitoring of Shivwits milkvetch to identify and manage disturbances to the plants or their habitats.

Webb Hill

We recommend a new ACEC be designated for the Webb Hill area because it contains important habitat for dwarf bear claw poppy. Dwarf bear claw poppy is federally listed as endangered under the Endangered Species Act. Webb Hill is an isolated BLM parcel of land west of Interstate 15 and northwest of Bloomington Hills. Due to the rarity of the species and its specific habitat requirements, it is necessary that BLM manage known habitats to benefit dwarf bear claw poppy. Our management recommendations include:

- a) no surface occupancy for fluid minerals leases;
- b) closed to fuelwood collection;
- c) closed to mineral material sales;
- d) right-of-way (ROW) avoidance;
- e) withdrawal from mineral entry;
- f) no motor travel outside designated roads and trails;
- g) grazing removal;
- h) no additional horse or bike trails.

We recommend BLM conduct annual monitoring of dwarf bear claw poppy to identify and manage disturbances to the plants or their habitats.

#### Harrisburg Bench

We recommend a new ACEC designation to protect the gila monster (*Heloderma suspectum*), and its habitats. This area is an isolated southwest ridge managed by BLM, near Coral Canyon, that is surrounded by private lands and serves as good gila monster habitat. Gila monsters are a state sensitive species and we recently received a petition to list gila monster under the Endangered Species Act. We recommend management maintain and conserve the gila monster habitat to the extent practicable.

#### Sand Mountain

Gila monsters are a state sensitive species and we recently received a petition to list the gila monster under the Endangered Species Act. Sand Mountain also contains many archeological sites that need additional protection. Desert tortoises have been listed as threatened under the Endangered Species Act since 1990. Currently, Sand Mountain is heavily used by off-road vehicles, and the resulting trails and associated impacts are increasing. We recommend OHV use be limited to designated trails and roads. The mid-section of the rim without gila monster habitat, non-archeological sites, and without tortoise habitat could be maintained for OHV use with a well-developed recreation plan with designated trails for specific user groups, focusing on archeological sites, gila monster and desert tortoise habitats conservation. We recommend educational kiosks, fencing, and law enforcement be used to maintain sensitive areas or rehabilitate impacted areas.

We recommend a new ACEC designation to protect the gila monsters (*Heloderma suspectum*), Mojave desert tortoises (*Gopherus agassizii*) and their habitats, and other species, such as various raptor species, and the cultural resources in this area (i.e. Dominguez-Escalante trail). The rims of Sand Mountain and surrounding rocky slopes and cliffs are important areas for gila monsters, raptors and cultural resource sites. Important areas for desert tortoises include the lower elevation portions of Sand Mountain area. Gila monsters are a state sensitive species and we recently received a petition to list gila monsters under the Endangered Species Act. Desert tortoises have been listed as threatened under the Endangered Species Act since 1990. Currently, Sand Mountain is heavily used by off-road vehicles, and the resulting trails and associated impacts are increasing. For the rim areas, we recommend OHV access be limited to only a few designated “look-out” trails but to keep trails in the area to a minimum. For the low elevation sites with desert tortoise and habitat, we recommend no OHV access and limited pedestrian trail access. The

mid-section of Sand Mountain, without gila monster and tortoise habitat could be maintained and managed specifically for OHV use and recreation. We recommend a well-developed recreation plan with designated trails to address specific user groups access, focusing on archeological sites, gila monster and desert tortoise habitats conservation. We recommend educational kiosks, fencing, and law enforcement be used to maintain sensitive areas or rehabilitate impacted areas.

#### Shinob Kibe

We recommend a new ACEC designation for this area because of its importance for dwarf bear claw poppy. Additional protection for poppy habitat adjacent to the Nature Conservancy Shinob Kibe Poppy Preserve would provide an important buffer to the existing protected area and increase habitat protection for the poppy. Dwarf bear claw poppy is federally listed as endangered under the Endangered Species Act. We recommend this designation for all poppy suitable habitats on BLM lands along the eastern boundary of The Nature Conservancy Preserve at Shinob Kibe and the area north of the Preserve to provide a buffer. A buffer will prevent future development from occurring immediately adjacent to protected dwarf bear claw poppy habitats. Management prescription should include:

- a) no surface occupancy for fluid minerals leases;
- b) closed to fuelwood collection;
- c) closed to mineral material sales;
- d) right-of-way (ROW) avoidance;
- e) withdrawal from mineral entry;
- f) no motor travel outside designated roads and trails;
- g) grazing removal;
- h) no additional horse or bike trails.

We recommend BLM conduct annual monitoring of dwarf bear claw poppy to identify and manage disturbances to the plants or their habitats.

#### La Verkin Creek

We recommend a new ACEC be established to better manage and protect the BLM land surrounding La Verkin Creek. Portions of the creek that are managed by BLM have historically contained Virgin spinedace, a state sensitive species managed by the Virgin Spinedace Conservation Agreement and Strategy (Addley and Hardy 1993). In addition, this area has the potential to provide riparian habitat that is important to migratory birds, and a designation could protect upstream portions of the La Verkin Creek watershed which would assist with maintaining adequate water quality and quantity (via infiltration and groundwater management) in downstream reaches of the creek. Although at this time we do not have information to recommend specific boundaries, we believe that the general area between Toquerville, Utah and the Zion National Park boundary should be considered for ACEC designation. We propose that Utah Division of Wildlife Resources, BLM, the Virgin River Resource Management and Recovery Program, and the Service collaborate on the final designation for this ACEC's boundary. We recommend BLM protect riparian area by excluding grazing.

## East Fork Beaver Dam Wash

We recommend that a new ACEC be established to better manage and protect the BLM land surrounding East Fork Beaver Dam Wash. Portions of the drainage that are managed by BLM have historically contained Virgin spinedace, a state sensitive species managed by the Virgin Spinedace Conservation Agreement and Strategy (Addley and Hardy 1993). In addition, this area has the potential to provide riparian habitat important to migratory birds, and a designation could protect upstream portions of the Beaver Dam Wash watershed which would assist with maintaining adequate water quality and quantity (via infiltration and groundwater management) in downstream reaches of the drainage. Although at this time we do not have information to recommend specific boundaries, we believe that the general area between the East Fork's most downstream confluence (with Beaver Dam Wash) and the Dixie National Forest boundary should be considered for ACEC designation. We propose that Utah Division of Wildlife Resources, BLM, the Virgin River Resource Management and Recovery Program, and the Service collaborate on the final designation for this ACEC's boundary. We recommend BLM protect riparian area by excluding grazing.

**Comment:** We recognize that Congress has given BLM a specific mandate concerning "biological conservation" within the Washington County bill. Nevertheless, we encourage BLM to not overlook the "relevant and important" cultural and historic values areas identified for "biological conservation." To this end, we ask that BLM make a specific determination of whether ACECs nominated during the planning process contain "relevant and important" cultural and historic values and, if present, to recognize and protect those values when designating ACECs.

Furthermore, we believe that in accordance with the "give priority" requirement of FLPMA that BLM should consider and develop ACEC nominations for areas where "biological conservation" is not necessarily a priority. This includes areas with historic and cultural values the importance of which was either not evaluated during the development of the existing resource management plan or that were not fully understood at the time; new information may very well have come to light since that plan was finalized in 1999 through cultural resources inventories, tribal consultation or some other means. Lastly, we support Citizens for Dixie's Future's ACEC nomination for Gunlock Square Top. According to that nomination, Gunlock Square Top contains numerous archaeological sites, including one cave with evidence from the Archaic Period and another—the "Ceiling Cave"—that has cultural significance to the Shivwits Band of Paiutes. Thus, the area seems to satisfy the "relevant and important" criteria. Furthermore, the area evidently needs "special management attention," as the nomination describes at least one recent looting event at the Ceiling Cave and extensive, potentially damaging OHV use within the area.

### **Comment:** TRANSPORTATION PLANNING

#### A. BLM Must Comply with Section 106 of the NHPA for the Comprehensive Travel Management Plan.

The Washington County bill requires BLM to develop a "comprehensive travel management plan" (Travel Plan) for BLM lands in the county. As part of this plan, BLM must "designate a system of areas, roads, and trails for motorized use." This action in turn requires compliance with Section 106 of the NHPA, 16 U.S.C. § 470f, because, as BLM has recognized, motorized use has the potential to cause direct and indirect effects on historic properties. See IM 2007-030 (recognizing potential effects on cultural resources from OHV route designations and use).

Section 106 and its implementing regulations impose a number of discrete requirements on BLM regarding preparation of the Travel Plan. First, BLM must initiate the Section 106 process by establishing the scope of the "undertaking." 36 C.F.R. § 800.3(a). In doing so, we urge BLM to reject the approach

encouraged by IM 2007-030—and followed by several other Utah field offices during recent planning efforts—that largely exempts “existing” OHV routes from the Section 106 process. We believe that this approach is inconsistent with the Section 106 regulations, which does not permit the use of such an exemption under these circumstances, and therefore violates the NHPA. See 16 U.S.C. § 470h-2(a)(2)(E)(i) (requiring consistency between an agency’s procedures and the Section 106 regulations). Moreover, the Advisory Council on Historic Preservation (ACHP)—the federal agency with expertise in historic preservation—has expressed concern for the ambiguities in IM 2007-030, in particular the direction concerning the designation of “existing” routes. Letter from Reid Nelson, Assistant Director, ACHP, to Kate Winthrop, Acting Preservation Office, BLM 1 (Aug. 30, 2006); see also Letter from Don L. Klima, ACHP, to Linda Hansen, California Desert District Manager, BLM 1–2 (May 27, 2003) [hereinafter “Klima Letter”] (identifying need to comply with Section 106 when deciding whether to designate a route as “open or closed”)

Second, BLM must initiate consultation with the Utah State Historic Preservation Office (SHPO) and identify other “consulting parties” to be formally involved in the consultation process, including Indian tribes. 36 C.F.R. § 800.3. To the extent that BLM has not already contacted the Utah SHPO about the travel plan, we recommend that BLM do so as early possible, and at least while alternatives are still being developed for the draft environmental impact statement.

Third, BLM must make a “reasonable and good faith” effort to identify historic properties. Once again, we strongly recommend that BLM not follow the approach outlined in IM 2007-030, which indicates that Class III inventories are normally not necessary when BLM designates an “existing” route for OHV use. Instead, after consulting with the Utah SHPO and other consulting parties, we recommend that BLM develop a comprehensive strategy for completing cultural resources inventories of proposed OHV routes. In the past, ACHP has advised BLM that such a strategy “need not necessarily include an intensive archaeological inventory of all routes, but it should be sufficient to demonstrate a reasonable and good faith effort to identify historic properties.” Klima Letter at 2.

We concur with this practical recommendation, which suggests that Class III inventories of “existing” routes must in some and, perhaps, many cases take place, and encourage BLM to prioritize inventories in areas with documented cultural significance, including ACECs with “relevant and important” historic and cultural values like Little Creek, sacred sites identified under Executive Order No. 13007, areas known or likely to contain high site densities and areas where conflicts between OHV use and cultural resources are known or are likely exist. We further recommend that BLM defer designating routes in areas with documented cultural significance until such time as it can complete cultural resources inventories of those routes. BLM recently adopted such an approach in the Record of Decision (ROD) for the Grand Canyon-Parashant National Monument Resource Management Plan, deferring route designations in ten areas with a “high-potential” for cultural resources pending completion of cultural resources inventories. BLM, Grand Canyon-Parashant National Monument ROD 9 (Feb. 2008).

Fourth, BLM must evaluate whether the effects of designating routes for motorized use will be “adverse.” In conducting this evaluation, BLM must recognize the potential for route designations to indirectly, as well as directly, impact cultural resources. See 36 C.F.R. § 800.5(a)(1). Professional archaeologists, as well as BLM, are increasingly finding that sites closer to travel routes are more susceptible to the indirect effects of OHV use, including vandalism and looting. See, e.g., Jerry Spangler, *Chasing Ghosts: An Analysis of Vandalism and Site Degradation in Range Creek Canyon, Utah* 22 (2006) (documenting high rates of vandalism at sites located within 200 meters of a road); Peter W. Bungart & Anne Raney, *Faint Traces in Fragile Places: Cultural Resources Survey Along Selected Roads & Routes In The Sonoran Desert National Monument* 95 (2009) (noting that the “overwhelming consensus among the archaeological profession, land managers, and concerned citizens is that the closer a site is to a motorized vehicle route, the greater the risk from vandalism or inadvertent disturbances.”); Letter from Michael

Stiewig, Price Field Office, BLM, to Lori Hunsaker, Deputy Utah SHPO 1 (July 7, 2009) [hereinafter “Stiewig Letter”] (“Indirect and cumulative [adverse] impacts [to cultural resources on the West Tavaputs Plateau] could potentially result from the . . . opening or improvement of various travel routes, including vandalism.”). Additionally, BLM has recently recognized that “increases in traffic on . . . roads” can cause other kinds of indirect adverse effects by altering the “setting, feeling, and association” of cultural resources. Stiewig Letter at 1. Consequently, BLM must “take into account” the potential for route designations to cause vandalism, looting, alterations to the setting, feeling or association of cultural resources and other potential indirect adverse effects.

Finally, BLM must develop measures to “avoid, minimize or mitigate” any adverse effects resulting from the Travel Plan. In cases such as this one where it is unlikely that adverse effects on cultural resources will be fully determined before the undertaking is approved, the Section 106 regulations allow BLM to develop a “programmatic agreement” (PA). 36 C.F.R. § 800.14(b)(1)(ii). This PA would then be developed in consultation with the Utah SHPO and other consulting parties and would list the specific actions that BLM would take in order to identify cultural resources, to the extent BLM had not done so already, and then avoid, minimize or mitigate adverse effects, including closing routes or otherwise limiting/controlling motorized travel within areas of documented cultural significance.

**Comment:** Please protect the proposed wilderness areas omitted from the Washington County bill, such as Dry Creek and the Beaver Dam Mountains.

**Comment:** Comments regarding “lands with wilderness character.”

Based on an assumption that some stakeholders will encourage the SGFO to inventory its lands for wilderness characteristics via this planning effort, we would like to provide the following comments:

1. Comment: Congress gave very specific instructions to the BLM regarding Wilderness.

Those instructions are contained in Section 603 of FLPMA. Congress instructed the agency to inventory all of their lands, identify which were definitely not of wilderness quality and then to begin an intensive inventory and analysis to determine which of the remaining lands would be recommended for inclusion into the National Wilderness Preservation System.

The process was completed in 1991. All stakeholders (including Wilderness Advocacy Groups) have exhausted the protest and appeal options. After 10 years the “603 Process” left Utah with approximately 3.2 million acres designated as Wilderness Study Areas. Of those, approximately 1.9 million acres were deemed “suitable and manageable” and were recommended to Congress for Wilderness designation. Section 603 requires the BLM to manage WSAs in such a manner so as to not impair the suitability of such areas for preservation as Wilderness, subject to existing uses.

There is no justification, no mandate in FLPMA and no process requirement for engaging in an ongoing wilderness inventory and review. Once the “603 Process” was completed, the agency is done. The question of which lands should be included in the National Wilderness Preservation System is now between Congress and the American People. Other than the management of existing WSAs, the BLM should have no part in this issue. To do so is a tragic loss of management resources.

2. Comments regarding the potential utilization of the 1999 Preliminary Wilderness Character Inventory Evaluation.

The BLM may attempt to utilize the 1999 Inventory in this RMP revision. BRC advises caution. The lack of public involvement in formulating the inventory criteria as well as lack of public involvement in the inventory itself, has produced a flawed result. Please see comments below.

a. It is improper to make decisions based upon an inventory for a single resource value.

BRC acknowledges that the agency can inventory to its heart's delight. This includes inventorying for resources or values associated with Wilderness. Our concern is how the inventory could be used in a RMP amendment.

Whenever making any land use planning decisions, the agency must comply with its congressional mandate to inventory for the "global" range of resources. The agency must not make decisions based on incomplete inventories, or inventories based on a single resource value.

Making a decision to manage an area in a primitive recreation class because the area has been identified to have "Wilderness Character" via the 1999 Inventory is no less appropriate than making a decision to implement a full field development for oil and gas based solely on inventories for mineral and oil and gas resources.

It is improper to make decisions based upon an inventory for a single resource value, in this case 'Wilderness character'. Section 201 directs the Secretary to:

"prepare and maintain on a continuing basis an inventory of all public lands and their resource and other values (including, but not limited to, outdoor recreation and scenic values), giving priority to areas of critical environmental concern."

It is clear from this language that all resource and other values on the public lands were to be part of a single inventory. When planning, there is no authorization for the agency to engage in inventories for a small segment (Wilderness) of only part of the spectrum of "resources and other values" (recreation). It is clear from the parenthetical phrase inserted in this section by Congress that Congress wanted the broadest range of resources and values considered, and listed specifically two among the many which were to be included.

b. Regarding the lack of public involvement in the 1999 inventory.

One serious concern with utilizing the 1999 Inventory has to do with the lack of public involvement in the development of inventory criteria. These are not merely semantic arguments. These concerns are directly related to the agency's Congressional mandates and obligations to the public when developing management plans.

BRC understands that the criteria used in the 1999 Inventory was identical to the "Utah Wilderness Review Procedures." Those procedures were modeled after the original Wilderness inventory, which had a number of requirements for public and local government involvement. In fact, the 1999 Wilderness review process was so closely modeled after the original one that large parts of the original inventory handbook are reproduced verbatim. Yet the term "public involvement" and similar terms have been purged from the review document.

In fact, although the original Wilderness Inventory Handbook acknowledged the importance of public involvement when inventorying for Wilderness characteristics, the 1999 Wilderness inventory criteria and procedures went out of its way to eliminate public involvement.

The original Wilderness Inventory Handbook (The Wilderness Inventory Handbook formulated for the inventory pursuant to FLPMA § 603, hereafter referred to as the WIH) on page 5 notes that:

"The wilderness inventory process requires full public involvement." This public involvement "is particularly important because the criteria in the wilderness inventory process call for judgments that can be highly subjective. In recognition of that fact, the BLM wilderness inventory process will be conducted as openly as possible with the broadest opportunity for input from all concerned, in order to arrive at a sound decision."

This is precisely correct, and it's also precisely why the 1999 Inventory is fatally flawed. The agency, when formulating inventory criteria during the original Wilderness inventory, understood that, unlike inventories for plant and animal species, or oil and gas potential, qualities that make up "Wilderness characteristics" are extremely subjective.

The process had become no less subjective and the task of doing a professional inventory no less difficult in 1999. Full public and intergovernmental comment, review and involvement were every bit as necessary as they were in the first inventory.

The BLM's claim that the only section of FLPMA that applied during their re-inventory for "Wilderness character" was section 201, and therefore these important public involvement provisions do not apply, is clearly wrong. Numerous sections of FLPMA and NEPA require full public involvement and participation of State, Local and Tribal officials.

The lack of public involvement in formulating the criteria for the 1999 Inventory has produced a flawed result.

c. The 1999 inventory criteria and procedures contained significant changes from the original WIH, and should have been open for public review and comment. Changing the criteria and procedures without public involvement resulted in a flawed inventory.

Secretary Babbitt stated that his re-inventory team "is explicitly instructed to apply the same legal criteria that were used in the original inventory." The re-inventory procedures document clearly shows that was not done.

The "Utah Wilderness Review Procedures" adopt some of the guidelines and requirements laid out in the original WIH and the Organic Act Directives (OADs). The Interior Department maintains that the re-inventory procedures are the same as the previous ones, thereby fulfilling Secretary Babbitt's commitment to the Utah's Congressional Delegation that the re-inventory team "is explicitly instructed to apply the same legal criteria that were used in the original inventory" to his re-inventory effort.

However, the "Utah Wilderness Review Procedures" selectively adopts certain paragraphs and sentences from the original documents, and even then often changing their arrangement or dropping and adding sentences. Secretary Babbitt had in fact created in the "Utah Wilderness Review Procedures" a new document without any public involvement or opportunity for review and comment.

A fundamental question should be asked of the BLM: if you were committed to using the same legal criteria as in the original inventory, why did you not use the original Wilderness Inventory Handbook? Why come up with something new?

Looking at the new re-inventory document, there appears to be a simple answer. Secretary Babbitt never intended to do the inventory under the same legal criteria used in the first one. These factors, along with

handpicking a re-inventory team led by, and heavily loaded with, BLM bureaucrats who are unabashed Wilderness advocates, underscores yet again that the 1999 Inventory was a purely political exercise. It simply was not designed to result in a useful or accurate review of the land being re-inventoried.

Two Examples:

Two examples, one dealing with "naturalness" and the other dealing with "outstanding opportunities for solitude," illustrate the major deficiencies in the 1999 inventory as a result of changing the criteria and procedure without public review and comment:

The WIH and OADs misapplied the Wilderness Act by giving emphasis to appearing natural as opposed to being natural, which was the prerequisite condition in the Wilderness Act. In determining naturalness, the WIH focuses on the requirement that it must be possible to "observe the area as being generally natural." This trend away from the intent of the Act is virtually complete with the "clarification" in OAD number 2, page 4, for field personnel to use in determining naturalness:

"There is an important difference between an area's natural integrity and its apparent naturalness. Natural integrity refers to the presence or absence of ecosystems that are relatively unaffected by man's activities. Apparent naturalness refers to whether or not an area looks natural to the average visitor who is not familiar with the biological composition of natural ecosystems versus man-affected ecosystems in a given area. As reflected in the handbook, the presence or absence of apparent naturalness (i.e., do the works of man appear to be substantially unnoticeable to the average visitor) is the question the inventory must assess."

The re-inventory document continues the move away from the original intent of the Wilderness Act with one significant change. The re-inventory document rewrites the last sentence:

"The presence or absence of naturalness (i.e., do the works of humans appear to be substantially unnoticeable to the average visitor?) is the question the Wilderness Act directs the review to assess."

At the stroke of a pen, the re-inventory document redefines the general term "naturalness" (as opposed to "apparent naturalness" in the OAD) to be whether "the works of humans appear to be substantially unnoticeable to the average visitor" and then attempts to make it the sole test the Wilderness Act requires for an area to pass the naturalness test.

This evolution (or more properly devolution) in the standard of what is natural has obvious advantages to those wishing to find Wilderness characteristics where the Wilderness Act standard would recognize none.

The subjective problems with determining "naturalness" pale beside those the BLM inventory procedures create for determining whether an area has the required "outstanding opportunities for solitude or a primitive and unconfined type of recreation" as the Wilderness Act requires.

By its nature, the determination of "outstanding" requires some type of comparison. The WIH defines the term "outstanding" as "standing out among others of its kind; conspicuous; prominent; superior to others of its kind; distinguished; excellent."

Yet the Utah review document specifically prohibits comparing areas.

Page 6, 3 (b) of the re-inventory procedures document states:

Each review unit must be assessed on its own merits as to whether an outstanding opportunity exists; there must be no comparison among units. It is not permissible to use any type of rating system or scale--whether numerical, alphabetical, or qualitative (i.e., high-medium-low)--in making the assessment. Good judgment must be used in determining that outstanding opportunities either do or do not exist in each unit. This is a subjective determination and should be made only after a careful assessment of a unit.

So, in total contradiction of the clear intent of the Wilderness Act, which defines Wilderness as "an area of undeveloped federal land...which...has outstanding opportunities for solitude or a primitive and unconfined type of recreation," the BLM manuals specifically prohibit the comparisons which are the only way to determine if an area truly does offer outstanding opportunities!

On p. 5 of the re-inventory document in the section dealing with "naturalness," paragraphs 2 (a) (1) and (2) are reproduced almost word for word. In the original WIH, however, there was a paragraph between these two:

Those parts of the inventory unit where the imprint of man's work is substantially noticeable will be eliminated unless the area meets all the other qualifications required and could, under certain conditions, be returned to a natural state. This instance is described later on in these procedures.

The first sentence in the next paragraph in the WIH reads: "Therefore, to qualify as Wilderness, an area may include some imprints of man's work provided they are substantially unnoticeable."

The re-inventory document presents this sentence as: "An area may include some human impacts provided they are substantially unnoticeable in the unit as a whole." Note the addition of the phrase "in the unit as a whole." The closest thing to that in the previous inventory document is a sentence in OAD 2, page 5: "Minor imprints of man must be evaluated as to whether individually they are substantially unnoticeable in the overall unit." The sentence, which followed in the OAD, was also omitted from the re-inventory document. However, it offers additional guidance which was used on the first inventory and which unquestionably would make a difference in evaluating an area depending on whether it was part of the re-inventory directive or not. It states: "Such minor impacts must also be evaluated as to their cumulative affect on an overall unit, both in connection with major impacts or by themselves."

Clearly, the re-inventory document has a much lower threshold for what qualifies as "natural" than the one applied in the original inventory.

A similar situation is the exclusion of two key paragraphs in the WIH. The re-inventory document reproduces the intent of this paragraph from page 13 of the WIH nearly word for word when it states:

Human impacts outside the review unit will not normally be considered in assessing naturalness of a unit. However, if an outside impact of major significance exists, it should be noted in the overall unit description and evaluated for its direct affects on the review unit. Human impacts outside the area should not automatically lead to a conclusion that a review unit lacks wilderness characteristics.

However, the WIH continues with the following two paragraphs:

The number, size and distribution of the imprints of man's work to the overall size of the unit should be considered in making the final naturalness determination. For example, in larger roadless areas, more or greater impacts may be more acceptable than in smaller areas.

After all impacts are considered, a determination must be made as to whether their overall impact on the landscape is or is not substantially unnoticeable. Photographs supporting impact descriptions and evaluations will be beneficial.

The significance of omitting the first of these two paragraphs is that it clearly introduces a "dilution component" to the Wilderness inventory. It states that the size of the unit is a key factor in determining the significance of a human imprint to the over all unit. The corollary is that the outstandingness of an area in terms of offering opportunities for solitude and a primitive and unconfined recreation is also affected by the size of the area, as outlined in the example of the 900 acres of outstanding land in a 1000 acre unit and 100,000 acre unit explained above.

Another example occurs in the re-inventory document on page 8 at 4 (C). The first sentence is taken almost word for word from OAD 2, page 5. It reads in the re-inventory document: "Where substantially noticeable human caused impacts occur within a review unit, reviewers should consider the opportunity to adjust the unit boundary to exclude the human impacts." The OAD goes on to direct that: "Major imprints of man which are substantially noticeable should not be carried forward as part of an inventory unit receiving further Wilderness review." This sentence was dropped from the re-inventory document.

3. The agency must not create a situation where an activity can occur for an inventory for a land management designation that precludes the very same activity.

This issue deals with the question of how lands that may possess wilderness characteristics will be managed. We are concerned because many of the areas that wilderness advocacy groups are saying have wilderness characteristics also experience meaningful historical use by motorized and/or mountain bikes. The BLM must not, through this planning effort, place itself and the recreating public in an awkward "catch 22" by inappropriately defining lands with wilderness potential that have long received meaningful motorized/mechanized access.

The "catch 22" here will occur if your inventory criteria for lands with wilderness characteristics allow for the presence of a significant amount of motorized use, but then your management proscriptions for the same area precludes those existing uses. If the existing uses do not stop the lands from being identified as having wilderness characteristics, then certainly those historic activities should be allowed to continue.

It has been recognized, as a matter of fact and law, that continuation of motorized activities within areas proposed or recommended for Wilderness does not significantly degrade wilderness values. In the same vein, federal courts have recognized that temporary noise and disturbance associated with motorized activity does not adversely impact wilderness character and is not inconsistent with laws, regulations, and policies requiring the maintenance of wilderness character. See *River Runners for Wilderness v. Martin*, 2009 WL 2151356 (9th Cir, 2009).

FLPMA's sections 201, 202 and 603 give the agency authority to inventory and manage for wilderness characteristics, but nothing in law or regulation mandates that "non conforming uses," uses be eliminated. Even the BLM's Interim Management Policy for Lands Under Wilderness Review does not mandate that non-conforming uses be eliminated.

One other important item related to wilderness. Only Congress can establish Wilderness. Congress, the American People, and those who live near these lands often work together to find the right balance of Wilderness and multiple use lands. Whenever a federal land managing agency makes those decisions itself, that unlawfully removes options for legislative compromise between wilderness advocates, local governments and other multiple use stakeholders.

**Comment:** BLM should designate the Zion Scenic Corridor Area of Critical Environmental Concern (ACEC) to ensure the amazing scenic quality of Highway 9 as it winds west of Zion National Park. This scenic byway is treasured by visitors from around the country and the world who travel to Utah's famous canyon country. BLM should also designate areas for the protection of wildlife habitat, such as the Virgin River ACEC to protect riparian habitat, and other areas that are key wildlife habitat migration corridors.

**Comment:** The BLM priority biological areas; or Areas of Critical Environmental Concern's (ACE'S) has a small sliver of protection along the Cougar Canyon wilderness area for water, but is minimal and there are no other conflicting values to an "open" travel designation. Congress has acted on the land status of the county in regards to protection.

We oppose any more additions of wilderness in Washington County –Congress has acted and settled the land designations. Besides, the ten priorities of the wilderness group's was released 2010, and even they realize that their priorities are outside of Washington County and concentrated on the southeastern part of Utah. Reference the Desert News article, "SUWA" Lists Its 10 Most Threatened Places In Utah", Published: Thursday, July 08, 2010.

**Comment:** ACEC's (Areas of Critical Environmental Concern)

We oppose the creation of any new ACEC's. The management philosophy in these areas appears to be a back door approach to creating new areas managed as wilderness without the appropriate process of actually designating them as wilderness. We feel that with the existing designated wilderness areas, along with the existing conservation areas there is already enough land in Washington County being closed off to motorized use.

**Comment:** In Washington County we have many areas off limits to motorized recreation. I believe what still exists can be managed responsibly with protection of ACECs. In my perspective we need to manage and preserve any existing routes that currently exist. Many existing trails may not be on your maps or were excluded from the 1999 RMP because the BLM did not know they existed. I feel that several areas could be managed better as far as redundant routes. This would be routes that are side by side of each other, past a mud hole or an area with rough terrain. Many of the local clubs will offer assistance and guidance on areas of concern. They will also organize work groups and help patrol and manage areas that are being abused. Your office has a great working relationship with the motorized community and I would like to see that relationship continue. I also wanted to suggest a procedure for routes and trails that may not be included in the RMP to be added at a later date. This procedure should be a streamline process within the scope of the plan. My main concerns is many trails and routes will be excluded from the plan, because they have not been submitted by individuals. I feel it is the responsibility of the BLM to take into consideration every known route as part of this plan and to include them as part of the High Desert ATV trail system. Many trails have connector routes and you can nearly ride anywhere in the county if you know what route to travel.

**Comment:** I believe this RMP in combination with the Washington County Land Use Bill will set the precedence of future RMP'S in the Western States. Lets get it right and take into consideration views from the locals and those that have the most at stake in the decision's made. These are the people who are most affected by management practices, not some guy from back East who has visited twice in twenty years. We have proven over the years especially in Washington County we are stewards of the land. We have protected critical habitat and ACEC'S as well as State Parks and recreation areas. We want to protect and promote our public lands more than any number of tourists and visitors, we have more at stake than just a place for some New Yorker to go on vacation. For many its and lifestyle and a way of life, not to mention how they make a living.

**Comment:** Conduct a wilderness inventory of BLM lands that may possess wilderness characteristics, including those proposed for wilderness designation in the pending America's Red Rock Wilderness Act (ARRWA) legislation, outside of those areas recently designated as statutory wilderness by Congress. Provide precautionary interim protection for those lands determined to have bona fide wilderness characteristics, including those proposed for wilderness designation in ARRWA but not yet protected by Congress. This protection should include restricting ORV uses as these can have a significant impact on wilderness values and wildlife, including through habitat fragmentation and enhancing the colonization and spread of harmful cheatgrass and other invasive/noxious weeds.

**Comment:** Water and Short Canyons on the south side of Canaan Mountain should be designated and managed for non-motorized use. These canyons likely possess important wilderness characteristics and other sensitive resource values, and they are proposed for wilderness in ARRWA. As such, they are not appropriate places for ORV use. Both routes that extend into the northeast corners of the Canaan Mountain wilderness and the Red Mountain wilderness areas should be closed because they are incompatible with the wilderness characteristics and values of these areas.

**Comment:** Evaluate all river and stream segments for potential eligibility and suitability under the National Wild and Scenic River System. Those segments found to have the requisite "outstandingly remarkable values" should receive interim protection by BLM to maintain those values until Congress has an opportunity to act on the findings.

**Comment:** In developing your Resource Management Plan for the Red Cliffs Desert Reserve, I urge you to designate an Area of Critical Environmental Concern (ACEC) for the Virgin River extending from the upstream limit of the Red Cliffs area downstream to approximately Stratton Ponds. A rationale in support of this recommendation is attached. While the entire paper provides data, documentation, and rationale for this recommendation, the last paragraph on page 32, continued on page 33 contains the specific recommendation for the area adjacent to the Red Cliffs Desert Reserve.

Because this area of the Virgin River falls within your area of consideration, I believe you are obligated under the Endangered Species Act to manage the area in a way that may tend to ensure the survival of the two endangered species living there, wound fin and Virgin River roundtail chub.

**Comment:** The state has concerns about the intent and extent of the analysis of issues mentioned in the NOI. For example, the BLM cannot substantively analyze air quality in Washington County without aligning with the state's regulatory permitting process. In addition, the state requests the BLM analyze not only the need for new Areas of Critical Environmental Concern (ACEC) as required, but also analyzes existing ACECs for continued need. The state requests the BLM consider, in light of the terms and intent of the Omnibus Public Land Management Act 0[2009 (P.L. III-II), whether the interim management policy for wilderness is still necessary in Washington County, and whether wild and scenic river study segments identified under previous studies remain covered by the study provisions of the BLM Manual. The state also requests that the BLM consider the provisions of R.S. 2477 in the analysis of OHV travel plans, in light of information provided by the state or Washington County, or recorded in the Washington County Recorder's Office. Finally, the state requests the BLM work in very close coordination with it and Washington County in the analysis of the proposed northern transportation corridor, in light of the need of species within the Red Cliffs Desert Reserve.

**Comment:** Subdivision & roads should be forbidden in our most beautiful areas. Especially the Red Cliff Preserve. Werner valley should also be protected.

**Comment:** Complete the SCRR Master Plan

**Comment:** Yant flat area should be part of wilderness.

**Comment:** The 1999 St. George Field Office RMP identified the possible development of a cooperative management agreement allowing Snow Canyon State Park (SCSP) officials to exercise day-to-day management of access and recreation on public lands immediately to the north and west of SCSP and in Paradise Canyon to the southeast, lands that now include parts of the Red Cliffs NCA. While a formal agreement has not yet been developed, SCSP, under the auspices of the BLM, did undertake day-to-day management relative to law enforcement, visitor services, recreation management, and resource protection on adjoining lands immediately east of Red Mountain. As on-going partners with the BLM within the Red Cliffs Desert Reserve (RCDR), the Utah Division of Parks and Recreation would appreciate the following items being taken into consideration during the current planning process:

1. Maintain annual seasonal closures (relative to technical rock climbing) on select routes west of West Canyon Road. These closures are designed to protect nesting raptors, including peregrine falcons, and have been implemented annually since 2000 in conjunction with local climbers and the Access Fund. Affected routes are closed from February 1 through June 1. Further route and closure information can be supplied by the Division of Parks and Recreation upon request.

2. Continue agency coordination in regards to recreation access from SCSP on to the Red Mountain Wilderness Area. While wilderness designation allows for primitive and unconfined recreation, including use by pets, SCSP law is more restrictive. Specifically, park law mandates that (a) hiking is on designated trails only (R651 -633-2.8a) and (b) dogs are prohibited from all trails and natural areas unless posted open (R651-633-2.8f). Future access points to and from the Red Mountain Wilderness Area should be coordinated to ensure that recreation use is consistent with Utah State Park rules.

3. Assess the development of a new hiking only trail on the east boundary of SCSP. Currently, area recreationists access a route on the eastern boundary of the park commonly referred to as Jones Bones (a.k.a. Valentine Peak). While the majority of this route is on State Park and private property (outside of the Red Cliffs NCA boundaries), the standard approach is across BLM property located within the NCA. Working cooperatively with the BLM and private land owners, the Utah Division of Parks and Recreation would like to mark and designate an official trail in this area.

**Comment:** As SUWA's letter dated December 19, 2009 explains, these areas with wilderness characteristics remain in America's Red Rock Wilderness Act (ARRWA); thus, SUWA and our partners in the Utah Wilderness Coalition (UWC) will continue to advocate for wilderness designation and protection of the wild lands that did not receive wilderness designation. As part of the RMP Amendment process, SUWA is providing new wilderness character information for these lands, and requests that BLM inventory and assess these lands pursuant to Section 201 of FLPMA. It is important to note that wilderness characteristics are to be identified and protected in all of BLM's land use plans, including the 1999 St. George RMP Amendment, the NCA plans, and the TMP. See Instruction Memoranda 2003-274, 2003- 275, Change 1; see BLM Land Use Planning Handbook (H-1601-1, 2005); ONDA, 531 F.3d at 1143. In fact, BLM's national guidance provides for management that emphasizes "the protection of some or all of the wilderness characteristics as a priority" over other multiple uses. IM 2003-275, Change 1 (emphasis added). Thus, on lands where BLM identifies wilderness characteristics, BLM must prioritize the protection of these values over other uses of the land that would detract from them. Furthermore, for all the areas that BLM determines, through its inventory process, possess wilderness characteristics, BLM must, pursuant to FLPMA, manage such areas so as to prevent actions causing unnecessary or undue degradation to those wilderness characteristics. 43 U.S.C. § 1732(b). This type of management would preclude surface disturbing activities and motorized route designations in areas with wilderness characteristics. Off-road vehicle routes greatly impact the sense of naturalness and solitude within wilderness character areas, fragment habitat, and unnecessarily and unduly damage this resource.

**Comment:** In an email to Dave Kiel dated July 13, 2010, SUWA provided updated GIS data to BLM regarding the following lands proposed for wilderness in ARROWA that have not yet been designated as wilderness areas or NCAs.

Beaver Dam Mountains North Wilderness Character Unit

Beaver Dam Mountains South Wilderness Character Unit

Beaver Dam Wash Wilderness Character Unit

Beaver Dam Wilderness Expansion (St. George BLM calls this Area Beaver Dam Mountains East and West)

Black Ridge Wilderness Character Unit

Butcher Knife Canyon Wilderness Character Unit

Canaan Mountain Wilderness Character Units

Cottonwood Canyon Wilderness Character Units

Crater Hill Wilderness Character Unit

Deep Creek Wilderness Character Unit

Doc's Pass Wilderness Character Unit (St. George BLM identifies this Area as The Narrows)

Dry Creek Wilderness Character Unit

Joshua Tree Wilderness Character Unit

Red Butte Wilderness Character Unit

Red Mountain Wilderness Character Units

Scarecrow Peak Wilderness Character Unit

Square Top Wilderness Character Unit

Taylor Creek Wilderness Character Unit

Zion National Park Adjacents Wilderness Character Units

**Comment:** SUWA is pleased to submit nominations for six ACECs in accordance with BLM's solicitation for nominations of priority biological areas.<sup>8</sup> See Map attached as Exhibit D.

**Comment:** SUWA is pleased to submit nominations for six ACECs in accordance with BLM's solicitation for nominations of priority biological areas.<sup>8</sup> See Map attached as Exhibit D.

Upper Beaver Dam Wash ACEC Complex

Greater Beaver Dam Slopes ACEC

Beaver Dam Mountains ACEC

Santa Clara/Gunlock ACEC

Lower La Verkin Creek ACEC

North Creek ACEC

**Comment:** In addition, certain designated ACECs should be managed as VRM Class II areas in order to protect scenic landscapes and viewpoints. ACECs should contain clear stipulations to mitigate the negative impacts from off-road vehicle routes and other human disturbance.

**Comment:** The Amendment to the St. George RMP should identify additional river segments as suitable for Wild and Scenic River designation. Although Congress designated certain segments as part of the National Wild and Scenic River System (NWSRS) in the Omnibus Act, this legislation does not preclude BLM from amending its 1999 RMP to take another look at its eligibility and suitability determinations. SUWA formally nominates the Beaver Dam Wash for Wild and Scenic designation from where it enters Utah from Nevada to the point it crosses into Arizona.

Please see the map attached as Exhibit G for the following river classifications (Blue=Scenic, Green=Wild).

Scenic: From the private property's eastern boundary located at T38S R20W, Section 23, to where the stream enters The Narrows at T38S R20W, Section 24 NWSE. Roughly ½ mile.

Wild: From the point where the steam leaves the vehicle track T38S R20W, Section 24 NWNE to just north of Holts Cabin, T39S R19W, Section 7 NESW. Roughly 4 ½ miles.

Scenic: From Holts Cabin to the private property located within T38S R19W, Section 20 SENW. Roughly 1 ¾ miles.

Scenic: From the southern boundary of the private property within T38S R20W, Section 20 SENW to boundary of the private property located at T40S R19W, Section 5 NENE. Roughly 2 ½ miles.

Wild: From the southern boundary of private property with T40S R19W, Section 20 NENW to the vehicle route crossing at T41S R19W, Section 17 NENW. Roughly 5 ¼ miles.

Wild: From the vehicle route crossing at T41S R19W, Section 17 NENW to the private property associated with Lytle Ranch at T41S R19W, Section 31 NWSW. Roughly 3 miles.

Wild: From where the power line, pipeline and vehicle route crosses Beaver Dam Wash near Burgess Wash at T42S R20W, Section 36 SENE to the Arizona State Line. Roughly 6 ¼ miles.

**Comment:** BLM's should, and is required to, consider ACECs beyond those that meet the description of priority biological areas.

**Comment:** BLM should limit motorized and mechanized travel within the NCAs to provide a high level of protection to the resources which the NCAs were designated to protect. The travel plan must comply with the enabling legislation, limiting motorized use to designated roads.

**Comment:** BLM should designate and protect the three Areas of Critical Environmental Concern (ACECs) as proposed in this nomination. All three areas are critical wildlife migration corridors within the St. George Field Office and areas where biological conservation is a priority. These areas include:

- Beaver Dam ACEC
- Pine Valley ACEC
- Black Ridge ACEC

**Comment:** The Notice of Intent states:

New Wild and Scenic River proposals will not be evaluated or analyzed in this plan amendment process. One suitable river segment under SGFO administration that was not designated into the National System of Wild and Scenic Rivers by Public Law 111-11 will continue to be managed in accordance with BLM Manual 8351 Wild and Scenic Rivers-Policy and Program Direction for Identification, Evaluation, and Management. This approach is inconsistent with applicable law and must be revised. The Wild and Scenic Rivers Act clearly intends a specific process for designation of river segments and expressly sets limits on the time period for making such designations. The failure of Congress to include any segment in the Act after prior action by BLM in attempting a determination of eligibility and suitability (already a legally flawed process that could not withstand appropriate scrutiny) ends the status of that river's administrative designation, which has no force of law. This element of the RMP must be included as an issue. Failure to do so would constitute violation of applicable law. The prior decision is now invalid and must be reconsidered pursuant to applicable provisions of H-1601-1 - LAND USE PLANNING HANDBOOK.

**Comment:** Western Watersheds Project is pleased to submit the attached nominations for designation of three Areas of Critical Environmental Concern (ACEC) in areas “where biological conservation is a priority,” pursuant to section 1979 of Public Law 111–11. We nominate the following ACECs that are priority areas for desert tortoise conservation:

1. Beaver Dam Slope ACEC (Expansion).
2. Red Cliffs ACEC.
3. Zion Gateway ACEC.

**Comment:** BLM must analyze the benefits of roadless areas (WSA, Wilderness, potential, conservation/refugia, research natural areas) to wildlife, and how those benefits to wildlife will be diminished by the visual and sound presence of these machines across the landscape.

**Comment:** I spent a week backpacking in the Mt Caanan Wilderness recently and was really upset to find ATV and jeep incursions throughout. In one case, they had driven up a small waterfall leaving tread marks. Our group consisted of seven of us from six different states. We chose the Mt Caanan Wilderness because we assumed that it was new and not as popular as other wilderness areas and that it would be quieter and more secluded. We heard AW noise on three different occasions. When we spoke to someone afterwards about it, their response was that the local BLM refuses to enforce any regulations.

I hope that this is not truly the case. Wilderness areas belong to all Americans not a few locals, and as such, it should be protected and regulated as intended.

**Comment:** I request that you inventory these proposed wilderness areas and do not allow ORV use there. The lands in the ARWA should be designated as primitive zones.

**Comment:** On the south side of Canaan Mountain both Water Canyon and Short Canyon should be closed to vehicle use.

**Comment:** With respect to ACEC nominations concerning the above RMP amendment, we hereby nominate LITTLE ROUND VALLEY, HOLMGREN MILKVETCH (various units based on critical habitat designations made by FWS) and BEARCLAW POPPY WEST as areas of critical environmental concern.

**Comment:** CDF recommends:

- BLM make a comprehensive review of existing ACECs
- Develop site-specific management plans for monitoring, enforcement and reporting
- Make ACEC funding a Priority
- Prohibit incompatible uses, recognizing that recovering damaged resources is much more difficult in the desert than preserving healthy ones
- Identify priority inholdings for public acquisition; BLM must ask for and congress must appropriate funds to purchase these lands
- Designate ACECs to protect larger areas; larger watersheds; and to protect ecosystem integrity, regional connectivity and wildlife corridors

**Comment:** Concerns with Existing ACECs

#### Santa Clara River Reserve (SCRR)

Currently there is only a small section inside the SCRR designated for protection in the management plan. This ACEC should be expanded to include Cove Wash and Box Canyon Wash and include the identified milkvetch habitat. The expansion should extend to match up with the Red Bluff ACEC along its northern border to protect this biological and archeological hot spot at the urban interface, as well as the critical water shed area.

#### Fort Pearce Wash and Warner Ridge ACEC

This ACEC should be expanded to include more habitat for the Gila monster in Warner Valley. Currently the ATV groups can be confused by including these areas in sand Mountain SRMA which is open to overland ATV use. These areas are being impacted by ATV trails. ATV groups and teenagers need to be educated about the fragile nature of these areas. It New maps should describe these fragile areas to the ATV groups. The historic buildings in Fort Pearce Wash were not mentioned in the 1999 RMP. In Fort Pearce Wash area Utah BLM could coordinate with Arizona Strip BLM to better manage this area to protect it BLM must be onsite to monitor the annual Rhino Rally motorcycle event. Little Creek Mountain ACEC

In 1999 an Area of Critical Environmental Concern (ACEC) was established with the adoption of BLM's Resource Management Plan (RMP) for the protection of the mountains rare and abundant archeological resources. Even with this prescription contrary designations were placed on top of these lands that have hampered the primary goal of protection and interpretation of archeological resources' These include, but are not limited to, an Open to Existing Roads Travel Designation, and an, Open to wood Harvesting designation. Further, with the designation of the ACEC BLM was obliged to develop an archeological protection plan. Authority includes:

Federal agencies have a responsibility to protect and preserve cultural properties. Because of the incompleteness of the cultural inventory, the urgency to mitigate against current and future direct and

indirect vandalism to sites, and because of the potential future knowledge that archaeological sites might be able to provide, a cultural resource protection plan is being prepared to direct and guide planning and management decisions on the Little Creek Mountain ACEC that will support this resource protection called for in the RMP (AC -07 2.66' and CL 2.52).

CDF understands a draft resource protection plan was developed in 2007 that set future use allocations, protection levels for various regions of the mountain based on current known densities' established a basis of existing roads as of 1999, developed a monitoring prodigal, and developed an approach for managing recreation and human use. we recommend that this protection plan be adopted and used as a basis to established protection zones and human use zones and develop the appropriate levels of motorized and non-motorized (both present and future) for the Little Creek Mountain ACEC. Further CDF specifically recommends:

1. Travel routes be limited to access only key trail heads and that the mesa primarily be managed for research, education, and a variety of biking, mountain biking, and equestrian, and other nonmotorized activities.
2. That wood cutting no longer be Permitted on the mountain
3. That no motorized Special Recreation Permits or Commercial permits be issued for lands on the Mesa
4. That designated road be restricted to passenger vehicles and that recreational OHV be restricted on the roads and trails of the mountain.

**Comment:** Nominations for New ACECs

- Virgin River ACEC (see Addendum "A")
- Zion Scenic Corridor ACEC (See Addendum "B" and ACEC Zion Scenic Corridor Map Exhibit "B1")
- Gunlock-Square Top (see Addendum "C" and ACEC Gunlock square-top Map Exhibit "C1")
- Mood Way (see Addendum "D" and ACEC Moody Wash Map Exhibit "D1")
- Upper Santa Clara River (see Addendum "E" and ACEC Upper Santa Clara Map Exhibit "E1")

## VISUAL RESOURCES

**Comment:** Finally, while the Company recognizes the BLM's Visual Resource Management objectives, it also encourages the BLM to consider the future need and probable location of transmission lines when designating Visual Resource Management classifications within the planning area. This will increase flexibility in transmission line siting and facilitate the development of viable alternatives in the transmission line planning process.

**Comment:** Finally, UAMPS recognizes the BLM's Visual Resource Management objectives, but we encourage the planning process to consider the future need and probable location of transmission lines when designating Visual Resource Management classifications within the planning area. This will increase flexibility in transmission line siting and facilitate the development of viable alternatives in the transmission line planning process.

**Comment:** Finally, while Dixie Escalante recognizes the BLM's Visual Resource Management objectives, it also encourages the BLM to consider the future need and probable location of transmission lines when designating Visual Resource Management classifications within the planning area. This will

increase flexibility in transmission line siting and facilitate the development of viable alternatives in the transmission line planning process.

**Comment:** I also support and recommend that the BLM SGFO develop a proposed Zion Scenic Corridor ACEC to maintain and protect the world-class scenic quality of Highway 9 as it winds west of Zion National Park. This scenic byway is appreciated by visitors from around the nation and the world. Similarly, and in addition to this proposed ACEC, BLM should consider restrictive Visual Resource Management (VRM) decisions to complement the ACEC and ensure protection of the undeveloped BLM lands that comprise the byway's viewshed.

**Comment:** In amending its RMP, BLM must update its visual resources inventory, and conduct thorough inventories of all visual resources in the St. George planning area. Since the St. George RMP was prepared in 1999, changes to visual resources throughout the planning area may have occurred, and it is important for BLM to conduct a new inventory that will reflect current conditions.

**Comment:** The Beaver Dam Wash and Red Cliffs NCAs, as well as lands identified as possessing wilderness characteristics, should be managed as Class I, or at a minimum Class II, areas in order to protect visual resources. The NCAs are congressionally-designated areas "where decisions have been made to preserve a natural landscape," and thus also must be given one of the most protective visual classifications.

**Comment:** In addition, certain designated ACECs should be managed as VRM Class II areas in order to protect scenic landscapes and viewpoints. ACECs should contain clear stipulations to mitigate the negative impacts from off-road vehicle routes and other human disturbance.

**Comment:** BLM must update its inventory for visual resources on all lands within the planning area. We urge BLM to prioritize completion of this inventory, as well as to keep the public apprised of the values identified. Updated VRM classifications should be incorporated into the new RMPs and the RMP Amendment to reflect the inventory and the new designations.

**Comment:** Finally, the City recognizes the BLM's Visual Resource Management objectives, but we encourage the planning process to consider the future need and probable location of transmission lines when designating Visual Resource Management classifications within the planning area. This will increase flexibility in transmission line siting and facilitate the development of viable alternatives in the transmission line planning process.

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**Comment:** Finally, the City recognizes the BLM's Visual Resource Management objectives, but we encourage the planning process to consider the future need and probable location of transmission lines when designating Visual Resource Management classifications within the planning area. This will increase flexibility in transmission line siting and facilitate the development of viable alternatives in the transmission line planning process.

**Comment:** BLMs VRM management areas are out of date and need to be updated to reflect the public's wish to preserve the scenic landscape in the Vision Dixie process. BLM should ensure that scenic value is a resource that is conserved and must establish clear management direction describing areas inventoried

and possessing high scenic importance with clearly defined objectives that limit surface disturbance within important viewsheds. Important scenic areas should be protected. CDF recommends BLM change VRM designations to:

VRM class I:

- The highway SR9 corridor from the LaVerkin twist to Zion National Park
- The NCAs
- All wilderness areas and ACECs
- The cliff face and ridge line of Canaan Mountain; the wilderness boundary is on the top of Canaan Mountain and leaves the cliff face of Smithsonian Butte unprotected
- Silver Reef-Leeds Navajo sandstone formations
- The ridge line of the Black Ridge
- The Hurricane Cliffs
- The Virgin, Santa Clara River and North Creek corridors

VRM class II:

- The red cliff face of Sand Mountain in Warner Valley
- Beaver Dam Mountains
- East face of the Apex slope, Little Creek Mountain, Castle Cliff Wash Area, Tobin bench
- Hwy 18 corridor

## GENERAL COMMENTS

**Comment:** I have a unique perspective, I have horses and enjoy riding in the hills in the winter and hunting deer in the surrounding mountains in the summer and fall seasons. I love the quality of life the outdoors bring to myself and my family. I want to preserve our open spaces and the access to them at any cost.

I also work for Questar Gas Company. I am the Operations Manager for the area. Over the past two years I have been working with local engineers, City and County Officials, BLM Representatives, Economic Development Leaders, Shivwits Band Tribal Counsel of the Piute Indian Tribe and others to identify potential corridors for a 24" reinforcement natural gas line coming into the area. This gas line is needed to assure future energy requirements for Washington County. During this time our options of corridors have become very limited because of the new declaration of Wilderness to our south and west. Our options have become very limited and this concerns me. We must not restrict the land to the point that we limit our ability to provide recourses to our area. I have worked for Questar Gas Company for over 23 years and have seen many pipelines constructed with sensitivity to the environment. It can be done with logic and team work. Please do not restrict the land so much that we cannot access them for recreational and practical needs. We can work together and maintain the pristine land and meet the needs of a growing economically healthy City, County and State.

**Comment:** Yours seems to be a state that is in favor or increased mineral mining. It seems to be a long tradition that Utah claim the lands for itself and its own uses in order to aid the economy. This however can be a bit wrong-headed and our comment is not the work of errant "environmentalists" as some Utahans have tagged us. Your wildlands and national and state parks garner much, much tourism and they increase your state's economy simply by being left natural. The grandeur and the beauty of highway 12 should make you want to balance mineral mining in a better way instead of fighting preservationists.

**Comment:** I am writing to urge the BLM to devise appropriate off-road vehicle routes. While I recognize that BLM lands are for multiple use, and that OHVs have recreational value, it is important to recognize that off-road vehicle use and oil and gas drilling and other intensive uses are incompatible with less intensive uses, such as the search for solitude, peace and quiet, or quality wildlife habitat. Simply put, off-road vehicles are loud, and they tear up the fragile desert topsoil, an impact with several indirect impacts such as lower water quality, lower air quality, and increased albedo on the snow pack in Colorado. The loud motors disturb wildlife, reducing the quality of wildlife habitat. In an age of climate change, it makes no sense to have a resource management plans that prioritizes obtaining and burning more carbon fuel. Please move us to the next step of resource management. One that recognizes the dire situation in which we currently sit. We have no choice but to reduce address climate change quickly and immediately. The amended resource management plan and the associated EIS should recognize this imperative shift in priorities.

**Comment:** ask you to consider protecting more of this land in Utah - and from irresponsible drilling, which Utah seems to have been "plagued" by during the past administration

**Comment:** I would like to see the mountain biking trails maintained and expanded in our area. I ride the local trails 5-6 times a week including the Bloomington trails - Bear Claw Poppy, Santa Clara trails, Church Rocks, JEM trail, Gooseberry Mesa, Little Creek Mesa and others. These trails/scenery rival anything that "Moab" has and brings enjoyment and exercise to locals and tourists. The trails during the winter are used by many for Salt Lake and other communities to the North. When everything else is frozen to the North, we still have rideable trails and it becomes a big draw and helps our economy locally.

**Comment:** Please consider this in making your decisions. Know that if the land was no longer accessible, we would have little to no reason to visit the St. George area. I know it is the same for at least a few other families that ride down there.

**Comment:** Utah and many of the towns of Utah need the revenue brought in by recreationists going to see these areas, If the roads and access to these areas are closed these towns will be severely affected economically.

These areas not only need to remain open to the public but free to use unobstructed by access tax more commonly called "fees". Do not create any areas of critical environmental concern. This is restricting the public's use of public land and is another form of the government taking away our freedom we so cherish in this country.

**Comment:** Our wilderness areas must be protected at all costs. They are being assaulted on all sides from companies that only want to use up these areas for the sake of profit. The American public values these areas for their recreational uses not for what can be wrung out of them for money!

**Comment:** The BLM, St. George Field Office is to be applauded for their continued use of the scientific processes of Benefits Based Management and Preferred Use. IMBA is pleased to see and encourages the continued dedication to the scientific decision making tools of Benefits Based Management and Preferred Use Classification in the St. George Field Office. These sociological studies combined with ecological and biological studies provide sound reasoning that results in user experiences that are inline with their expectations and results in efficient use of natural resources. Moreover, the proper use of these scientific methods is exactly the type of study envisioned by Congress when drafting the laws governing agency action.

**Comment:** Please listen to the local citizens. Their opinion matters the most because they will be most significantly affected by how neighboring public land is designated (or not designated). Yes, it is public

land and everyone should have a say; but the local communities and citizens should have the MOST say, without a doubt. Please don't force any particular designation down their throats. They are those who will be living, on a daily basis, with the decision you make so please listen to them. As a Utahan myself, but one that resides in Northern Utah, I understand that that I'm discounting my own opinion, and I'm okay with that.

**Comment:** Like many of us who are retired, we are not around much in the summertime-- we travel to escape the heat. I am saddened to see that the Scoping Meetings in the area regarding the planned use of the new NCAs all seem to be scheduled for June. Is this a coincidence, or a cynical decision to help exclude large numbers of retirees, many of whom moved to this area in the first place because of the existence of the Red Cliffs Desert Reserve and other outdoor recreation?

**Comment:** Additionally, please include and reference for our public comments the social and economic analysis of, the "Recreational Off-Highway Vehicle USE On Public Lands In Utah", by Utah State University, dated April 2008, prepared for the state of Utah and the office of the Governor. Authors: Steven W. Burr, and Paul Jakus.

<http://extension.usu.edu/iort/files/uploads/pdfs/OHV%20Final%20Report%209-30-09rev.pdf>

**Comment:** As part of its planning process, BLM should conduct qualitative or social research to support its decision to allow ORV use in particular areas or on particular routes. BLM must then make this data available to the public for comment. Specifically, the St. George field office should undertake a visitor survey to ascertain actual visitor preferences and uses (motorized and non-motorized) throughout the field office. Having actual visitor information will be a useful guide for BLM's long-term recreation management decisions and ORV route designations.<sup>7</sup> The data should then be incorporated into the environmental assessment of the TMP to accurately depict impacts to resources and non-motorized users from BLM's route designations. BLM must similarly analyze the ongoing impact of existing ORV use in Washington County and include an analysis of whether the route designations are sustainable over the long term.

**Comment:** BLM should analyze the socioeconomic impacts of the proposed management alternatives in accordance with the approach set out in "Socio-Economic Framework for Public Land Management Planning: Indicators for the West's Economy," including the more specific considerations detailed above. The values of protected lands and the costs associated with motorized recreation should be incorporated into economic analysis.

**Comment:** To protect the right of a free people to conduct commerce all roads to and from private property and State trust land must remain open!

**Comment:** Rockville Rd. is a designated Scenic Route. This road is torn up every time it get wet by the people who use it for recreation, viewing the scenic views or traveling to work from 59 to highway 9. The road is probably illegal because of the grade on the Rockville side. Someday someone will be injured trying to use this by-way. Thanks. P.S. It costs a lot to keep grading it.

**Comment:** Put ATV trails through all your wilderness & HCP property - so we can all enjoy.

**Comment:** Take over (obtain) the SITLA land in the Warner Valley area.

**Comment:** The off highway designation maps displayed were slightly misleading. The National Park & Forest area aren't marked in any way, as far as access is concerned. Just glancing at the maps would lead one to believe most of the area of the map is not closed to vehicles.

**Comment:** Please be mindful of the need for utility corridors between Red Butte & St. George. Present plans call for an upgrade to the line - increasing the capacity. This increase in capacity is necessary in the immediate future & is a life-safety issue. Hot summers & cold winter mornings coupled with growth place severe demands & loads on existing infrastructure. An allowance is necessary for higher capacity lines & their needed right-of-way.

**Comment:** Another important aspect of the plan is that the area administer by the various agencies, all groups to be done in a cohesive fashion so they are all working together and not working at odds with each other or by different rules. Cohesive actions to designate, control, administer, patrol and maintain all of the areas together.

**Comment:** Need to also work as much as possible with all the various groups interested in the areas - environmentalists, ATV riders, hikers, horseback riders, photographers and general visitors. All are important to end up with a comprehensive plan for the area. Also need to keep in mind the overall ideas of limited development and importance of open space & open vistas as wanted by the citizens of Washington County as specified by the report of citizen under Vision Dixie. Insure that there is adequate input and public comment for all sides to air their views and even though not everyone will be entirely satisfied with the result, there can be plenty of available recreation for all. Keep multiple use in mind always.

**Comment:** Hurricane City is a member of UAMPS and is connected to the power grid through a UAMPS transmission line that originates in Central, Utah at the Central/Red Butte substations. This transmission line brings power to Hurricane and other power entities in Washington County along a power corridor that terminates at the St. George Substation in the area of the Old Turkey Farm north of St. George. From the St. George Substation, several smaller lines exit to supply the needed power capacity to the many different power entities in the area. These smaller lines are adequate to supply the current power needed but do not have enough capacity to supply the area's needs for the future. Hurricane is at great risk of not having enough capacity for future growth. Upgrades of existing lines or the construction of new lines are required to get the capacity Hurricane will need in the near future. These needs are expected within the current decade. The Central to St. George transmission line and the other smaller lines have sections that are located within Conservation Area Boundaries

UAMPS, Rocky Mountain Power and Dixie REA are working together to limit the number of new lines that need to be built in Washington County. This group meets as a Joint Task Force and have studied the options of how to best get the needed capacity and redundancy into Washington County. The preferred option for this capacity is to build one 345 KV transmission line from Sigurd to Three Peaks in Cedar City to Hurricane and then over to the St. George Substation. This one line would need to be routed through the Red Cliffs Conservation Area but would negate the need to build multiply lines. This one large line would supply the needed capacity to Hurricane and other power entities on the east side of Washington County. The 345 KV line would also supply the entire Washington County with the needed power supply redundancy. In association with the projected 345 KV line, a new substation will need to be built. We are currently calling this future substation "Hurricane West".

Failure to allow for one or more future transmission corridors across the Red Cliffs Conservations will in essence cut Hurricane off from the power source at the St. George Substation. Hurricane's future depends on access to the St. George Substation and/or capacity from Three Peaks in Cedar City.

Hurricane City Power is requesting that one or more power corridors from Hurricane to St. George Substation be included in the Conservation Management Plan or that wording be included to allow for such corridors.

Hurricane City Power is also requesting that any exiting power corridors within the management area be preserved and access allowed for future maintenance and upgrades of the corridors and power lines.

Hurricane City Power is supportive of the Conservation Area Management area and has worked with the other power entities over the years to limit the impact of power lines on public land.

**Comment:** a joint task force was created in an effort to coordinate transmission needs for southwest Utah. The joint effort was intended to minimize the number of mid-size transmission lines such that a larger-size transmission line replaces multiple mid-size transmission lines. The joint task force combined forecast reflects growing population and electrical demand into the foreseeable future, necessitating additional high-voltage transmission lines within the timeframe of the Bureau of Land Management's (BLM) planning process. Therefore, we encourage the BLM to retain existing designated utility corridors and consider designation and use of new major utility corridors as acceptable future actions in the resource management planning process so that construction of future high voltage transmission lines and other transmission projects across these lands would not require plan amendments.

There is currently an application for the Energy Gateway South high-voltage transmission line and presentations have been made to the BLM and U.S. Forest Service discussing joint task force long-term plans for additional high-voltage transmission lines. One of these is a planned 345 kV transmission line from Sigurd to Three Peaks to Hurricane to St. George substations. As part of this transmission line a new Hurricane substation would need to be constructed. A portion of this project, from Hurricane to St. George, would replace the need for up to three lower voltage 138 kV lines with a single 345 kV line, reducing the footprint for transmission facilities throughout the area. This 345 kV line should be included in the planning process as a reasonably foreseeable action.

**Comment:** The Company encourages the BLM to consider not imposing seasonal restrictions on the operation and maintenance requirements of existing utility facilities. Allowing normal operation and ongoing routine maintenance of facilities without imposing seasonal limitations can reduce unscheduled interruptions to service and the need for larger corrective maintenance actions. As part of this request, we respectfully ask for continued use of existing roads allowing access to Company rights of way for the performance of inspections and ongoing operation and maintenance activities.

**Comment:** UAMPS strongly advocates that the BLM retains existing designated utility corridors and consider designation and use of new major utility corridors as acceptable future actions in the resource management planning process so that construction of future high voltage transmission lines and other transmission projects across these lands would not require plan amendments.

**Comment:** After a detailed process that evaluated all options, the joint task force long-term plan concluded that a 345 kV transmission line from Sigurd to Three Peaks to Hurricane to St. George substations is necessary for the reliable service of electric power to the County. As part of this transmission line the Hurricane West substation would need to be constructed. The portion of the project from Hurricane West to St. George would replace the need for up to three lower voltage 138 kV lines with only one 345 kV line, reducing the footprint for transmission facilities throughout the area. This 345 kV line should be included in the planning process as a reasonably foreseeable action.

**Comment:** UAMPS also encourages the BLM to consider alternative utility corridors that are not already congested with existing utilities. While co-locating linear facilities may appear to be good planning, the net outcome may be a less reliable system which would necessitate construction of additional facilities in distinct geographic areas away from existing facilities thereby compromising the Federal Land Policy and Management Act's (of 1976) objective to discourage the proliferation of rights-of-way. Currently the single major transmission path from the Central to St. George substations is the only transmission path for

all of the customers in the St. George area served by the Rocky Mountain Power, UAMPS, and DG&T. This is a significant problem for the delivery of electricity to these customers because this path has experienced several outages in recent years due to wildfires resulting in extended outages lasting up to several hours. An important function of the planned new 345 kV transmission line described above is to provide a more reliable and robust delivery system to serve the ongoing growth in the area. This path will provide a "loop" feed allowing continued service in the area in the event one path has disruption to service.

**Comment:** UAMPS respectfully requests that the planning process allows for the continued use of existing roads allowing access to utility facilities rights of way for the performance of inspections and ongoing operation and maintenance activities.

**Comment:** Therefore, we encourage the BLM to retain existing designated utility corridors and consider designation and use of new major utility corridors as acceptable future actions in the resource management planning process so that construction of future high voltage transmission lines and other transmission projects across these lands would not require plan amendments.

**Comment:** The portion of this project from Hurricane to St. George would replace the need for up to three lower voltage 138 kV lines with a single 345 kV line, reducing the footprint for transmission facilities throughout the area under discussion. This 345 kV line should be included in the planning process as a reasonably foreseeable action.

**Comment:** Dixie Escalante strongly encourages the BLM to consider alternative utility corridors that are not already congested with existing utilities. While co-locating parallel facilities in close proximity to one another may appear to be good planning, the net outcome is a less reliable system which would necessitate construction of additional transmission facilities in distinct geographic areas away from existing facilities, thereby compromising the Federal Land Policy and Management Act's (of 1976) objective to discourage the proliferation of rights-of-way. Further, the existing transmission path from the Central to St. George substations is the single major transmission path for all of the customers in the St. George area served by Dixie Escalante, UAMPS, DG&T, and PacifiCorp. Reliance on this single, major path has proven to be a significant reliability problem for the delivery of electricity to St. George area customers, as this path has experienced several extended outages in recent years due to wildfires. An important function of the planned new 345 kV transmission line described above is to provide "looped" feeds from geographically separated right-of-ways, allowing continued service in the area in the event one path has disruption to service.

**Comment:** Dixie Escalante encourages the BLM to consider not imposing seasonal restrictions on the operation and maintenance requirements of existing utility facilities. Allowing normal operation and ongoing routine maintenance of facilities without imposing seasonal limitations can reduce unscheduled interruptions to service and the need for larger corrective maintenance actions. As part of this request, we respectfully ask for continued use of existing roads allowing access to utility rights of way for the performance of inspections and ongoing operation and maintenance activities.

**Comment:** That the configuration and status of private and public lands in the planning area be explicitly outlined so the public can understand the baseline from which future land exchanges and sales will be proposed. We would like to see detailed maps of land ownership—state, county, private, federal.

That the analysis provide clear overall goals for any changes in land configuration that will be proposed under the new RMP.

That it include some history of land exchange policies and actions in the area that resulted from the creation of the Washington County Habitat Conservation Area. This would include legislation passed in 1996 (PL 104-333) that mandated an appraisal process for land trades (in Washington County alone) that acts to the advantage of private land owners

**Comment:** Local impact of BLM planning. I am concerned that the current planning process is leading to further disparity between federal resource management and local values and desires for public land use. This is reflected further in my comments below. Considering the huge areas of land managed by federal agencies in the Washington County area, the potential impact on both local economics and local culture cannot be underestimated. As a result, I believe that greater deference to local values, culture, and desires for local public lands should be given, over policies set by agencies and individuals outside of Washington County. However, I fear that this is not the case and that local interests will be discounted in favor of outside politics and policies, including but not limited to the desires of environmental groups whose extreme views include prohibiting all beneficial human use of natural spaces.

**Comment:** 7. Sale into private ownership. I believe that lands designated for private sale should be sold into private ownership as soon as reasonably possible under the given circumstances, market conditions of course being taken into account. As a general rule, more private lands means more private ownership and more local control over these lands, which I believe is generally a good thing when contrasted with federal control, especially here in Washington County where federal lands are so vast.

**Comment:** BLM, Please follow the suggestions of Citizens for Dixie's Future and implement "Vision Dixie" as they have outlined it. It has been thoroughly and thoughtfully researched and represents what is best for the area.

**Comment:** Groups opposing motorized recreation are well-funded and usually create a perception of having broad support when in reality they represent only a fringe of the population. The reality is that the vast majority of people do not support the narrow agenda of the radical environmental groups, but you won't hear from them proportionately to their numbers because they are not well-funded and well-organized like the racial environmental groups are. Please consider this when you are evaluating input. The radical environmental groups are hiring people to provide "manufactured input" that is essentially just their own propaganda.

It is important to keep these areas open to motorized recreation for the impact it has on the economy and to protect the rights of the majority to use public lands responsibly in motorized recreation.

**Comment:** Item #1: This RMP Amendment process provides a great opportunity to integrate the ten Vision Dixie Principles and is an opportunity that the BLM should seize. I participated in the Vision Dixie process by facilitating the mapping process at several Vision Dixie workshops and by attending Steering Committee meetings as an interested citizen. Political and development pressures in our county are strong and sometimes overwhelming as we've seen before the recent economic downturn. When the 2006 Washington County Growth and Conservation Act was introduced, there was a lot of concern among the county's citizens about the process and political and developmental pressures that were brought to bear in the development of the document. The upheaval created by the 2006 bill resulted in the creation of the Vision Dixie process. Thousands of Washington County residents took their precious time to participate in the Vision Dixie workshops – to make their voices heard and choose a future for our county. This should not be negated by making decisions that fly in the face of those principles just because political pressure may be brought to bear. BLM can – and in fact should – serve as a leader in this county by making decisions that protect the health of our lands, water and air – standing behind the citizens who gave freely and generously of their time and energy to the Vision Dixie process. The Washington County Commission created and ostensibly stands behind the Vision Dixie process and its

results, which are clear and unarguable, and which should be used in this RMP Amendment process. I will not take time to list the Vision Dixie Principles here as they are easily obtainable. Although the local development community and politicians believe that growth is a good and necessary thing for this county, BLM should be aware of the growth studies that have been done and which show that areas that preserve their uniqueness and don't destroy those qualities through excessive and unconstrained growth are often the areas that do the best economically in the long run for all citizens – not just a choice few -- and maintain what's important to their communities. With the current economic downturn and slowing of growth in Washington County, now is the time to make decisions that will have a positive impact when development and growth pick up again, and we know they will. I recognize that the checkerboard pattern of SITLA land in our county will result in challenges as we move forward with implementing the Vision Dixie Principles county wide, but close coordination between BLM and SITLA is demanded to ensure that the vision set forth by the county's residents is realized. There is no doubt that the schools of this state are important and funding them through SITLA land sales is a valuable thing but it should not be done at the expense of other issues in our lives. I believe a balance can be achieved. Perhaps smaller SITLA bonuses will help them meet their bottom line more effectively without sacrificing what's important to other citizens.

**Comment:** Item #3: The Virgin River is critical to our area and should be protected by whatever means the BLM has. I am not a believer that the Lake Powell Pipeline would have a positive effect on the Virgin River basin as is put forth by our local water organization, which contends the demands on the Virgin River will increase if the pipeline is not built. In fact, excessive growth in our area, which would be promoted by the extra Colorado River water, would put demands on both rivers. So ultimately, the demands of growth will put pressure on the Virgin River with runoff from growth and the pollutants it may carry having a negative effect on the Virgin River ecosystem. In scoping comments submitted to FERC for the Lake Powell Pipeline Project, the National Parks Service voiced their concerns that the pipeline would have a negative effect on the Virgin River. The BLM should, in my opinion, make this a special area of study and concern before the river and its species are threatened beyond repair. Protective management is required to ensure this river is protected adequately.

**Comment:** With this background in mind, I'd like to make some introductory overview comments. First, I believe that BLM may be taking a too narrow approach to the subject of the Dixie RMP revision. The new statute does call upon BLM to identify and better protect areas of ecological rarity, sensitivity, or importance, and that is properly an important "driver" of the revision process. However, the 1999 Dixie RMP is now eleven years old, which is approaching the normal fifteen-year lifespan for BLM RMPs. Given another four years of arguable shelf life, it seems somewhat silly and wasteful to conduct a somewhat narrow revision process now based on the statutory guidance, and then to shortly turnaround (perhaps a year or two after the new Record of Decision (ROD) goes into effect) to start another de novo RMP revision process. My point is that it may not be too late to revise the scope of the current Dixie RMP revision so that other relevant (and arguably interconnected) issues and concerns can be addressed now. That way, a full revision would occur, and the new Dixie RMP ROD could serve for the next fifteen years.

**Comment:** Another overview comment relates to BLM's use of possible new or expanded Area of Critical Environmental Concern (ACEC) designations to fulfill the new statutory objective to better identify and protect priority ecological resources. Such designations are indeed an important tool, and the actual land use restrictions decided upon to achieve the purposes of those designations are crucial. Adding an ACEC polygon to a map does little; it is the decisions tied to the designation, and their adequate implementation, which are the keys to an ACEC's success. In addition, there are other management tools to achieve this new statutory objective.

For example, allowing continued livestock grazing in an ACEC established to protect riparian habitats and associated special status species may greatly weaken or undermine the basic integrity of that ACEC. The same may be said about an upland ACEC or NCA established, in whole or in part, to protect Mojave desert tortoises or other special status species. This is due to the link between livestock grazing, breaking up of cyptobiotic soil crusts, higher densities of cheatgrass, and the associated increased risk of more devastating habitat-converting fires. I realize that there may be strong political pressures to retain historic livestock grazing uses. However, BLM is obligated to follow the law and best available scientific information which I believe means that some meaningful management changes are reasonable, necessary, and even long overdue. Since decisions on whether existing BLM livestock grazing allotments should remain available or become unavailable for continued grazing can only properly be made during an RMP revision process, I recommend that the current Dixie RMP revision process include the fresh consideration of those decisions. The longer this consideration may be deferred or postponed, the worse damage that may occur, whether to riparian or upland habitats and associated special status species.

**Comment:** I urge you to give favorable consideration to the recommendations made by the Southern Utah Wilderness Alliance group in your development of all plans for managing Utah BLM lands, some of which have been highly abused to date. Although an eastern "outsider", the SUWA group has greatly impressed me with their ability to come up with intelligent, well -studied proposals for "best use" of what's left of America's truly wild lands.

**Comment:** believe a good relationship between the using groups and the controlling agency is critical for the land and the people who use it.

**Comment:** I have been active in advocating preservation of southern Utah for a long time now. I am a supporter of the Wilderness Society's aims. I hope the BLM will stand strong to preserve this one-of-a-kind environment.

**Comment:** There is no other place on this planet as beautiful as this area. It should never be touched by developers, oil and gas diggers, etc.

**Comment:** Please protect the Red Rock areas of the Colorado Plateau and beyond.

**Comment:** Prepare an off-road vehicle Transportation and Travel Management Plan. Prepare Resource Management Plans for Beaver Dam Wash NCA and Red Cliffs NCA.

By implementing the points listed above, you will ensure protection of habitat and wildlife, set an important precedent for BLM offices throughout the state as more public lands bills become law, and designate appropriate off-road vehicle routes.

**Comment:** there is nothing worse than encountering motorized vehicles and their accompanying damage. Please try to limit their impact into Utah's back country. Motorized travelers tend to cover so much ground in such short time they impact a huge area and all the animals, including people in a wide area. Hikers move slowly, tend not to disrupt wildlife, clean up after themselves and virtually leave no trace. The pristine nature of Utah's back country is its chief draw.

**Comment:** Please do all in your power to protect the Red Rock wild lands of Utah. They are a National Treasure.

**Comment:** I hope you will keep that in mind when you manage the Mohave Desertlands and Red Rock country of Utah, as these lands are entrusted into your hands. I hope you will keep ORVs from scarring and raping the wilderness and landscape.

**Comment:** Fourth, it is my understanding that the BLM has a responsibility to protect the land as well as manage in for multiple uses. So, in this case which is more important: protecting a fragile land area or allowing recreational vehicles to destroy it? Please, rule in favor of protecting the land and protecting the use of the area for hikers.

**Comment:** As a citizen of Dixie, I urge you to preserve the unique geologic features and recreational areas of this part of southern Utah for future generations. In addition to the preservation of the unique landscape and recreational and open areas, in this arid land water conservation, quality and protection is also a primary concern! I've watched Citizens for Dixie these past years spend thousands of hours getting public input on Dixie's future growth and how that can be done while preserving the natural habitat, splendid geologic formations, clean water, etc. I ask that BLM work with all the locally involved agencies in this area and especially the recommendations which have come from the citizenry through Citizens for Dixie recommendations. This part of Utah's landscape is unlike any other in the nation and any changes or decisions regarding the preservation or use of open areas, trails, water use and quality should be made only by getting all concerned agencies involved. I have studied CDF's recommendations. They are well thought through and very accurately reflect the growth and land and habitat preservation concerns of this southern Utah area.

**Comment:** I once wrote a letter-Spectrum-that as a newcomer, I was amazed by the extensive OFF ROAD destruction. I almost didn't move here but El Paso Texas was worse...hard to believe. I see this area as was/and is getting to be more, a WRECK-CREATION area to satisfy the money interest. Money interest is what got us into the Gulf oil crisis. Let us not have Washington County (and Utah) get sucked into the same morass.

**Comment:** Attending the meeting on June 14th in St. George was a real eye opener. I can see your idea of not really having a meeting in the sense of a meeting but rather a place to look at stuff. What a disappointment this was to me and probably most everyone who showed up. It was a lot of fancy showy stuff but not a lot of your people that I talked to knew much about what I wanted to know. I understand why you do it this way is to avoid conflict and you never really have to face the public. Those type of meetings can go on for ever.

**Comment:** A. Management Requirements of the Washington County Bill

The Washington County bill designated the NCAs in order to “conserve, protect, and enhance” the cultural, historical and other specific resources of the areas and directed BLM to manage the NCAs “in a manner that conserves, protects, and enhances” those resources. Thus, the “principles of multiple use and sustained yield”, which normally guide BLM’s management of the public lands, do not apply here—or only apply to the extent they do not conflict with the conservation mandate in the Washington County bill. See 43 U.S.C. § 1732(a) (directing BLM to manage special designations in accordance with their establishment acts). This overarching conservation mandate must guide the development of the RMPs for the NCAs.

In addition to this conservation mandate, Congress also included specific requirements concerning the management of the NCAs within the Washington County bill. These requirements include a prohibition on motorized vehicle use on anything but designated “roads” within the NCAs. Thus, in the RMPs, BLM must ensure that it only designates “roads” and not “areas” or “trails” and affirmatively prohibits “off road” vehicle use within the NCAs. The Washington County bill also restricts all other uses of the NCAs to those that further one or more of the conservation purposes listed in the bill. Lastly, the bill authorizes BLM to designate and allow OHV use on a so-called “High Desert Off-Highway Vehicle Trail” (Trail). However, in designating and managing the Trail, Congress stated that BLM must “minimize any damage”

to cultural resources. Thus, in the RMPs, BLM must explain how it will satisfy this minimization standard for the Trail.

**Comment:** B. Management Requirements of Instruction Memoranda 2009-215 & 2009- 226

Last year, BLM's Washington Office issued two instruction memoranda (IMs)—2009-215 and 2009-226—that govern the planning process and management of “special designations.” First and foremost, IM 2009-215 confirms that because the “designating language is the controlling law”, in this case, the Washington County bill, the RMPs for “special designations” must “comply with the purposes and objectives of the [designating language] regardless of any conflicts with the FLPMA’s multiple-use mandate.” IM 2009- 215.

Second, IM 2009-215 requires BLM to: (1) identify the resources for which Congress designated the NCAs (i.e., the cultural, historic and other resources listed in the bill); and (2) illustrate how the RMPs protect those resources. We encourage BLM to comply with this requirement expressly during the planning process and provide the public with as clear an illustration of how the RMPs protect the NCAs’ conservation resources as possible. Similarly, IM 2009-226 requires BLM to “inventory” the “values for which” Congress designated the NCAs.

**Comment:** I am the Public Lands officer for the Back Country Horseman of Utah (BCHU). I am interested in the planning process your office will be going through for the implementation of the Omnibus Public Lands Management Act of 2009. I understand that you are planning some scoping meeting for plan amendments for the RMP to implementation this bill. I would like to be kept informed of when these meetings are planned and where. As you are aware, your bill is the example that a number of other public land bills within Utah is being patterned after. BCHU has been very involved in volunteering to maintain horse trails and assisting the BLM with their mission to manage public lands. We have enjoyed an excellent relationship with your organization and would like to be involved in this planning process.

**Comment:** A. Key Comment: The route designation process should be incorporated into the RMP amendment process.

BRC requests review of the decision to leave Individual route evaluations and designations until after the St. George RMP amendment is final.

During BLM's revision of the Moab, Price and Monticello RMP/Travel Plan BRC argued for a more traditional “tiered” process, where the RMP would be completed prior to the site specific route designation plans. BLM ignored our input and developed a statewide policy of preparing two simultaneous EIS's, one for the RMP revision and the other for the comprehensive travel planning. Here, BLM is consistent with the State policy, except the SGFO intends to prepare an EA instead of a EIS. We request a review of that decision.

First, and most importantly, an EA may not be sufficient to comply with the mandates under the National Environmental Policy Act (“NEPA”). We note that travel management planning appears to constitute an activity which “[n]ormally requires an environmental impact statement.” 40 C.F.R. § 1501.4(a). NEPA requires a federal agency to prepare an EIS for all major federal actions that “may significantly affect the quality of the human environment.” 42 U.S.C. § 4332(2)(C). The term “human environment” refers not only to the physical environment but “shall be interpreted comprehensively to include the natural and physical environment and the relationship of people with that environment.” 40 C.F.R. § 1508.14.

This project contains too many interrelated decision elements over too broad and diverse a land mass to be properly analyzed in an EA. It is telling that even outside Utah, the vast majority BLM offices conducting travel management activities are analyzing projects of this nature through an EIS.

Please also consider the fact that Utah's conservation groups are known for a very active litigation program. What happens to the EA if your ROD is appealed, or heaven forbid, litigated?

If an agency decides not to prepare an EIS, it must supply a “convincing statement of reasons” to explain why a project’s impacts are insignificant.

We request the agency consider incorporating the route designation EA into the RMP amendment EIS. Doing so will allow timely implementation of Section 1977 of the Washington County Growth and Conservation Act, provides appropriate level of environmental analysis and protects against appeal and litigation.

**Comment:** C. BLM should develop a wide range of Alternatives

BRC supports active recreation management on all public lands and National Forests. Insofar as active management of OHV use, the OHV community generally supports the “travel limited to designated roads, trails and areas” paradigm. The OHV community also supports the need to revise Land Use Plans in response to changing conditions. And the OHV community also understands that not every area is appropriate for OHV use, and areas need to be provided for non-motorized and primitive recreation opportunity.

What we do not support is being presented with a “range” of management alternatives which all represent a significant reduction in OHV and other recreation opportunity.

NEPA imposes a mandatory procedural duty on federal agencies to consider a reasonable range of alternatives or preferred alternatives analyzed during a NEPA process. 40 C.F.R. § 1502.14; 40 C.F.R. § 1508.9. “[A]gencies shall rigorously explore and objectively evaluate all reasonable alternatives.” 40 C.F.R. § 1502.14. The alternatives section is considered the “heart” of the NEPA document. 40 C.F.R. § 1502-14 (discussing requirement in EIS context).

There is a need for, and BRC strongly encourages the SGFO to develop, an Alternative that focuses on providing a wide range of diverse recreation opportunity, including an Alternative that provides a wide range of diverse opportunity for motorized and mountain bike enthusiasts.

**Comment:** D. Proper formulation of the Purpose and Need, Planning Issues and Planning Criteria is critical for a successful planning effort.

BLM's planning team and the decision maker should prioritize the development of the Purpose and Need, the Planning Issues and the Planning Criteria. Special attention should be given to the development of these key items.

The distinction between planning criteria, planning issues and the term “issues” as it is used in the generic sense in BLM's scoping materials should be disclosed and discussed in the EIS (and EA).

The Purpose and Need for the NCA management plans, the comprehensive travel plan and management for priority biological areas is properly driven from the legislation, specifically, sections 1977 and 1979.

Given that existing OHV designations are consistent with the “limited to designated roads and trails” mandate of the Washington County Growth and Conservation Act, the public must be able to understand the Purpose and Need to revise OHV designations. The public needs to understand the need for change.

BLM should not allow redundant planning issues and planning criteria narrow the range of Alternatives and/or diminish the agency's multiple-use/sustained yield mandate.

For example, the NOI states:

Preliminary issues for the planning area have been identified by BLM personnel; Federal, state, and local agencies; and other stakeholders. The issues include: Air quality, management of Beaver Dam Wash NCA, management of Red Cliffs NCA, and priority biological conservation areas.

Our understanding is that a planning issue is a matter of controversy or dispute over resource management activities or land use that is well defined and entails alternatives among which to choose. Planning issues may be a concern expressed by the public, state/local government or other stakeholder, and may include concerns about potential serious deterioration of public land, significant impacts or conflict, or uses that may not be in the best public interest. Planning criteria are different, usually described as “sideboards” or parameters established by laws, regulation, policy or other planning guidance.

When examining the SFGOs preliminary planning issues and planning criteria we find items that are more properly discussed under a purpose and need statement or planning criteria. The management of the NCA's and priority biological conservation areas have been mandated by the Act. These are not planning issues in the traditional sense. They seem more appropriate as planning criteria.

The concern is that ill-formed planning issues sometimes serve as justification for unlawfully narrowing the range of alternatives.

**Comment:** G. Comment on preliminary planning criteria

1. The public planning process for these NCAs will be guided by Public Law 111–11, in addition to FLPMA and NEPA.

FLPMA Sec. 202, particularly subsection (c)(1) that specifically requires development and revision of land use plans on the basis of “principles of multiple-use and sustained yield.” FLPMA section 102(a)(7) also specifically requires that “goals and objectives be established by law as guidelines for public land use planning, and that management be on the basis of multiple-use and sustained yield unless otherwise specified by law.”

43 C.F.R. 1601.0-8 provides, “The development, approval, maintenance, amendment and revision of resource management plans will provide for public involvement and shall be consistent with section 202 of the Federal Land Policy and Management Act of 1976. ...”

43 C.F.R. 1610.4-4 states, “The analysis of the management situation shall provide, consistent with multiple-use principles, the basis for formulating reasonable alternatives, including the types of resources for development or protection.” 43 C.F.R. 1610.4-5 states: “All reasonable resource management alternatives shall be considered and several complete alternatives developed for detailed study. ...”

**Comment:** G. Comment on preliminary planning criteria

5. New Wild and Scenic River proposals will not be evaluated or analyzed in this plan amendment process. One suitable river segment under SGFO administration that was not designated into the National System of Wild and Scenic Rivers by Public Law 111–11 will continue to be managed in accordance with BLM Manual 8351 Wild and Scenic Rivers—Policy and Program Direction for Identification, Evaluation, and Management.

The EIS should disclose any impacts to existing recreational uses within and adjacent to potential W&SR segments. This is especially important if a potential W&SR designation will result in roads or trails being closed.

**Comment:** G. Comment on preliminary planning criteria

6. Area designations (Open, Closed, or Limited Use) for motorized recreation will be consistent with the BLM National Management Strategy for Motorized OHV Use on Public Lands and transportation and travel management policy.

BLM needs to clarify the purpose and need to change the OHV area designations. It should be noted that the “Limited” category is consistent with “limited to designated roads and trails.” The public must be able to find a nexus between conditions on the ground and the need for change in each Alternative.

**Comment:** G. Comment on preliminary planning criteria

9. At least one alternative will identify a “northern transportation corridor,” as mandated by Public Law 111–11.

I participated in the Washington County Land Use Working Group initiated by then Governor Olene Walker. During those meetings and field trips we supported the original proposal that was proposed in the very first High Desert Trail working group. At least one Alternative should include this proposal.

**Comment:** H. Comments regarding the agency’s requirements for disclosure and analysis

1. The SGFO should develop logical significance indicators for recreation

The analysis must determine logical significance criteria for socio-economic and recreational opportunity impacts. Indicators such as miles of routes available for motorized use are useful, but others are needed for adequate analysis, such as number of loops, diversity of modality, number of existing routes closed, number of campsites closed, level of difficulty, and similar factors.

2. The analysis must disclose and analyze effects of the human environment in the proper context

Far too often agency analyses are plagued by a preoccupation with documenting impacts to physical resources. Environmental impact analysis documents often include statement after statement regarding various negative impacts of roads and vehicle use; i.e., trampled vegetation, compressed soils, increased sediment loading, disturbed wildlife, etc. while including little or no information about what the existing condition is, or how the existing motorized and non-motorized uses are actually impacting resources, or whether that impact is significant, let alone a meaningful contrast between the current condition and the various alternatives. In addition to these physical resource issues, the agency must evaluate human and socioeconomic impacts, both positive and negative, including quality of visitor experience and economic impacts.

Impacts should be evaluated and disclosed in a fair and unbiased manner and with a relative sense of magnitude. Analysis of vehicle use should be compared and contrasted to baseline data in order to establish a threshold on which the significance of the impacts of the proposed actions can be determined.

Impacts should be described in sufficient detail for the public to fully understand the nexus between the impacts and the conclusions and, ultimately, the decision reached by the Deciding Officer.

### 3. Wildlife and habitat impact analysis:

An assumption that is often proffered by other stakeholders is that closing roads and trails to motorized uses will dramatically improve the effectiveness of wildlife habitat. In our opinion, much of the rationale expressed for restricting motorized vehicle use is tied to incomplete research and grossly excessive extrapolation of research data, and often directly contradicted the current condition on the ground today.

The SGFO must not automatically assume that closing roads and trails to motorized use will instantly increase habitat effectiveness. The analysis must not improperly assume or over-estimate the beneficial effects to wildlife resulting from motorized route closures.

It should not be assumed that the elimination of motorized use would drastically reduce disturbance of wildlife or improve “wildlife vulnerability” when walking persons, persons on horses, mountain bike use, bird watching, hunting and numerous other uses that are documented to disturb, harass or kill wildlife are still allowed.

### 4. Soils and watershed analysis

Conclusions regarding impacts to soils and watersheds in the DEIS must be supported with site-specific analysis sufficient to comply with NEPA.

Routes should not be categorically excluded from being incorporated into the classified road and trail system simply because they lie within a soils or watershed “polygon.” The mandates of the Act does not absolve the agency from complying with other applicable law, including NEPA, which requires relevant, site specific analysis as well as the development of a wide range of Alternatives.

Soils and watershed resources can benefit most from proper route alignment and provisions to monitor, maintain routes to minimize impacts. Closing routes to motorized use while still allowing hiking, mountain biking and equestrian use does not stop soil or watershed damage.

### 5. Species of concern

The SGFO must support any claim that various recreational activities (e.g., off-highway vehicle use, camping, equestrian use, hunting etc.) pose significant threats to any sensitive, threatened, endangered or other species of concern. Claims that are highly speculative and based on little or no reliable data should be excluded from the environmental analysis.

The agency must establish more than a causal connection between recreation activities and any perceived declines in the population of any threatened or endangered species known to reside in the planning area. At most, the technical data shows that some recreational activities, in some areas, have the potential to displace some species on a very local level. This, however, cannot establish that recreational activities pose a substantial threat to an entire population or subpopulation of a particular plant or animal.

Impacts should be evaluated and disclosed in a fair and unbiased manner and with a relative sense of magnitude. Analysis of vehicle use should be compared and contrasted to baseline data in order to establish a threshold on which the significance of the impacts of the proposed actions can be determined.

Impacts should be described in sufficient detail for the public to fully understand the nexus between the impacts and the conclusions and ultimately the decision reached by the Deciding Officer.

**Comment:** I. Regarding funding for implementation, maintenance and enforcement of motorized routes

The Washington County Growth and Conservation Act mandates BLM to promote citizen-based opportunities for the monitoring and stewardship of the trail; and trail system management; and to support law enforcement officials in promoting compliance with off-highway vehicle laws (including regulations); and effective deterrents of abuses of public land.

BRC's members and supporters understand that monitoring maintenance are legitimate concerns. They are incorporated into the "Four E's" management paradigm promoted by the National Off Highway Vehicle Conservation Council ([www.nohvcc.org](http://www.nohvcc.org)).

BRC supports these important goals and ask the planning team consider the following comments. But we also want the planning team to know that the trail using public doesn't want the agency applying a strict maintenance budget criteria only to motorized trails and not to other programs. And BRC strongly objects to using funding for implementation, monitoring and maintenance and enforcement as a "designation criteria."

It has been our experience that: "if you plan for it, the dollars will come." The current travel planning activities mandated by the Washington County Growth and Conservation Act create an unprecedented opportunity to apply available resources to long-neglected travel management duties.

Fortunately, the agency has the tools to address legitimate concerns about route maintenance. There are many grant and volunteer opportunities available, including the Utah OHV Program. Our suggestion is that you include direction in your amended RMP and/or travel plan to train agency staff on how to apply for grants, use the challenge cost share program, effectively manage volunteer programs and learn about and apply for other funding sources. In addition, you might consider MOU's or other similar agreements with recreational groups.

The Record of Decision itself should provide clear direction to leverage partnerships, pursue MOU's or other agreements with OHV groups, involve volunteers and leverage grant programs to monitor and maintain the OHV route system. (Plan for it – the dollars will come.) The final plan should incorporate direction to pursue agreements with motorized users and user groups. For example, the final plan could incorporate direction to establish a Utah Trail Patrol in order to educate visitors and provide "peer enforcement" of the travel plan.

Some stakeholders are asking about the ability to enforce the travel plan. This issue is very difficult to incorporate as a planning issue or designation criteria. If it were, we would be arguing for the designation of the maximum number of routes as doing so would clearly be easier and less expensive to enforce.

Still, enforcement is an important concern. Our recommendation is that you give the motorized visitor sufficient and enjoyable opportunity. This is recognized as a critical component of compliance. For more information on this topic, the planning team may wish to consult the National Off Highway Vehicle Conservation Council and their "Four E's" concept for successful OHV management.

**Comment:** The end result of this plan should include an enjoyable and sustainable road and trail system that provides adequate opportunity for existing and future use.

I do NOT support being presented with a "range" of Alternatives in which all represent a reduction in OHV opportunity. Neither the letter nor spirit of the BLM's planning policies, BLM's existing Resource Management Plan or the Washington County Growth and Conservation Act suggests, let alone mandates, an aggressive closure plan.

The agency must develop a wide range of Alternatives, including an Alternative that enhances motorized and mountain bike trail-based recreation.

**Comment:** Use and integrate the Vision Dixie principles wherever appropriate and possible to ensure improved and more sustainable land management decisions and actions.

**Comment:** These lands are designated as multiple-use lands. We ask that management for sharing of these lands for multiple-use be selected as the preferred alternative. Sharing would include a 50/50 sharing and equal opportunity of non-motorized to motorized trails.

**Comment:** In all of the hundreds of federal actions in the past 7 years, we have yet to see a meaningful evaluation this cumulative effect. It seems that both the BLM and Forest Service are using forest planning and travel management planning as an opportunity to close as many motorized recreational opportunities as fast as possible. We are asking that this project establish a baseline evaluation and address this significant impact.

**Comment:** In all of the hundreds of federal actions in the past 7 years, we have yet to see a meaningful evaluation this cumulative effect. It seems that both the BLM and Forest Service are using forest planning and travel management planning as an opportunity to close as many motorized recreational opportunities as fast as possible. We are asking that this project establish a baseline evaluation and address this significant impact.

**Comment:** A reasonable alternative should include:

- a. Sharing non-motorized trails with mountain bikes and motorcycles,
- b. Creating new mountain bike and motorcycle trails,
- c. Creating ATV trails from roadbeds that both currently open and closed,
- d. Creating new ATV trails
- e. Creating new ATV trails that connect with converted roadbeds to create loops, and,
- f. Establishment of 4x4 challenge routes using roadbeds that are both currently open and closed including historic mining routes.

We would respectfully request that these points and others in the following comments be adequately addressed so that a reasonable pro-recreation alternative can be implemented.

**Comment:** A planning criteria that must be included is the need for actions to prevent unnecessary and undue degradation of these public lands that would result if the management prescription is not updated to protect the lands from encroachment for garbage dumping, target practice (which generally involves

garbage dumping to provide targets), OHV and other motorized use outside of designated roads and trails and similarly degrading activity

**Comment:** BLM has indicated, in its overview of the scope of planning issues, that “[o]ther issues beyond [those listed] will not be addressed in this planning process outside the NCAs. However, BLM is required to consider changed circumstances, and the need to reassess the appropriate mix of allowable uses by the LAND USE PLANNING HANDBOOK, H-1601-1. The Handbook specifies that public lands be managed in a manner that protects the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archaeological values; that, where appropriate, will preserve and protect certain public lands in their natural condition. The Handbook states that BLM should understand current conditions and trends of the resources and the uses/activities that will relate to potential decisions in the plan amendment. It also provides that new decisions may be required in the case of environmental disturbances that significantly change natural conditions, which can be derived from information from the public or others regarding conditions or uses of resources on public lands. This scoping comment provides just such information that calls upon BLM to reconsider its management for the area in question. The Handbook notes that when deciding whether changes in decisions or the supporting NEPA analyses are warranted, “A „yes” answer to any of the following questions suggests the need to revisit existing decisions and/or the NEPA analysis: ...Are the decisions in the current land use plan no longer valid, based on significant new information or changed circumstances? If decisions are not valid, the decisions need to be vacated, replaced, or changed through plan amendment or revision. Examples of situations that may require new or changed land use plan decisions include, but are not limited to ... public comment... supporting a different mix of uses on the lands that will better promote the long-term health and sustainability of the lands and their resources ...” pp. 38-40

Appendix D to the Handbook notes that “[a]s the human population continues to increase and social values evolve, resource conflicts are likely to increase.” The BLM should consider the impacts of the potential to open this area up to jeeps, trucks, OHVs and the attendant garbage dumping, shooting and other activities on the adjacent neighborhoods. If there is any doubt about this likely impact, a short jaunt across the highway to BLM lands that are readily accessible by legitimate roads will reveal that there is ample use of this nature to the east of Highway 18. BLM should consider the impacts of any action that might allow those uses to spread to the west. So, in addition to its statutory duty to take action to prevent unnecessary and undue degradation to the lands, the BLM must consider the degrading impacts of the situation created by the potential funneling of public use, in particular motorized use, into this narrow corridor adjacent to a residential neighborhood.

**Comment:** Both water development and water transmission lines must continue to be accommodated in the Conservation Area. In this desert environment, water is a critical element and must be utilized wherever it is found.

A major power transmission line is already planned along the 1-15 corridor going through the Conservation Area. This line will allow multiple power utilities to combine their transmission needs onto one line and to provide future capacity for the future citizens of this area. The line is critical for the future of Hurricane City Power.

**Comment:** I hope that the BLM will look at all sides when making the very important management plan. My family and I have been recreating in southern Utah for many years. It is very important to me to be able to for many years to come. We ride dirt bikes, ATV's, UTV's, horses, and hike.

**Comment:** 4. Commercial users: ranchers, seed harvesters, etc., do indeed depend on public lands for livelihood. I do not see gas companies & mining companies in the same category as ranchers. They don't depend on public lands - they make their fortunes off the citizen/taxpayers who pay for land management

agencies such as BLM. I hope those companies pay proportionate share of the costs to our agencies for the services.

**Comment:** 6. Your example of input seems biased to ATV/ORV users. How about some examples for equestrian users, mt. bikers, and hikers?

**Comment:** 1. Applicable Legal Standards

When completing its land use plans, including the Travel Management Plan, National Conservation Area RMPs, and amendments to the 1999 St. George RMP, BLM must comply with federal environmental laws and regulations, including the National Environmental Policy Act (NEPA), 42 U.S.C. § 4321 et seq., the Federal Land Policy and Management Act (FLPMA), 43 U.S.C. § 1701 et seq., the National Historic Preservation Act (NHPA), 16 U.S.C. § 470 et seq., the Endangered Species Act (ESA), 16 U.S.C. § 1531(b) et seq., the Clean Air Act (CAA), 42 U.S.C. §§ 7401, et seq., the Clean Water Act (CWA), 33 U.S.C. §§ 1251, et seq., Executive Orders and Secretarial Orders, and other applicable regulations.

**Comment:** NEPA dictates that BLM take a “hard look” at the environmental consequences of its proposed actions, including the field office-wide land use planning decisions being undertaken by the St. George field office. 40 C.F.R. § 1508.8; see *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 348 (1989). In order to take the “hard look” required by NEPA, BLM must assess impacts and effects that include: “ecological (such as the effects on natural resources and on the components, structures, and functioning of affected ecosystems), aesthetic, historic, cultural, economic, social, or health, whether direct, indirect, or cumulative.” 40 C.F.R. § 1508.8.

BLM’s hard look must be based on “accurate scientific information” of “high quality.” 1 40 C.F.R. § 1500.1(b). BLM cannot evaluate consequences to the environment, determine avoidable or excessive degradation, or assess how best to designate and protect Areas of Critical Environmental Concern (ACECs) without adequate data and analysis. In sum, the St. George field office must use the best available science, conduct appropriate analysis of the data, and make the data and analysis available to the public with a clear explanation of how it came to its land use planning decisions. Importantly, 40 C.F.R. § 1502.15 requires agencies to “describe the environment of the areas to be affected or created by the alternatives under consideration.” Thus, NEPA insists that agencies establish baseline conditions and data from which they can accurately describe the affected environment. In *Half Moon Bay Fisherman’s Marketing Ass’n v. Carlucci*, 857 F.2d 505, 510 (9th Cir. 1988), the Ninth Circuit found that “without establishing . . . baseline conditions . . . there is simply no way to determine what effect [an action] will have on the environment, and consequently, no way to comply with NEPA . . . The concept of a baseline against which to compare predictions of the effects of the proposed action and reasonable alternatives is critical to the NEPA process.” Thus, the St. George field office must obtain baseline data for the different parameters that will be impacted by its land use planning decisions, including air quality, water quality, visual resources, and wilderness characteristics.

**Comment:** The St. George field office must provide the public with an explanation of both the data used in analyzing the potential effects of management alternatives and the methods used to 5 conduct the analysis, as well as provide an opportunity for the public to comment and propose corrections or improvements.

**Comment:** The St. George field office must ensure that it analyzes mitigation possibilities in its land use plans and honestly explain their likely effectiveness.

**Comment:** The St. George field office must ensure that the decisions it makes in its plans will not violate the Clean Air Act, the Clean Water Act, or other air and water quality standards.

**Comment:** In conjunction with its travel plan and other land use planning decisions, the St. George field office must conduct a full-scale quantitative analysis of the air and water quality impacts expected in the planning area and model these impacts to ensure that national and state air and water quality standards will not be exceeded as a result of its land use plans.

**Comment:** In completing its Travel Management Plan, and other land use plans, the St. George field office must comply with Executive Orders and agency regulations implementing these Orders that limit off-road vehicle (ORV) use on public lands. Executive Order 11644 (1972), as amended by Executive Order 11989 (1977), and BLM's regulations (43 C.F.R. § 8342.1) require BLM to ensure that areas and trails for off-road vehicles are located:

- to minimize damage to soil, watershed, vegetation, air, or other resources of the public lands, and to prevent impairment of wilderness suitability;
- to minimize harassment of wildlife or significant disruption of wildlife habitats, and especially for protection of endangered or threatened species and their habitats;
- to minimize conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or neighboring public lands; and
- outside officially designated wilderness areas or primitive areas and in natural areas only if the agency determines that off-road vehicle use will not adversely affect the natural, aesthetic, scenic, or other values for which such areas are established.

These Executive Orders put the burden of proof on BLM to ensure that sensitive and protected conservation lands are not harmed by ORV use. Under these directives, the St. George field office should start from the position of evaluating all uses of lands that may harm or conflict with the directives outlined above. Then, BLM must take a hard look at a reasonable range of alternatives for ORV use and give adequate consideration to public input. BLM should provide objective evidence to show how the agency has located ORV areas and trails to minimize damage to natural and cultural resources, or should otherwise keep areas closed to ORV use. BLM must consider a "closed unless posted open" policy alternative for the entire field office and should designate routes with sensitive species, habitat, wilderness values, and other resources in mind. Only after comprehensive deliberation has occurred can BLM comply with its legal obligations of minimizing damage when designating ORV use areas and routes.

**Comment:** BLM must also comply with applicable secretarial orders, including Secretarial Order No. 3226 which requires BLM to "[c]onsider and analyze potential climate change impacts when undertaking long-range planning exercises, setting priorities for scientific research and investigations, and/or when making major decisions affecting DOI resources." Secretary of the Interior Order No. 3226 § 4(a) (2009). Particularly given the arid, sensitive desert environment in Washington County, the St. George field office's land use plans must analyze how its decisions might contribute to climate change effects, and how its ecosystems will be impacted by, climate change. The land use plans must examine the most current scientific studies of climate change in the southwestern United States, and must thoroughly analyze how the activities permitted in the land use plans, e.g. ORV use and grazing, will contribute to climate change.

**Comment:** A revision, as opposed to just an amendment of the St. George RMP, is justified to fully assess the impacts of the decisions that the agency is in the process of making, as well as the changes in the underlying conditions and assumptions that formed the basis of the 1999 RMP, on the multiple resources and uses of the planning area and provide consideration of alternatives to allow true multiple use and sustained yield. In developing and evaluating potential management alternatives, BLM should bear in mind the concept of multiple use in order to inventory and safeguard resources such as scenic values, cultural resources, and wildlife habitat and create ACECs and other appropriate administrative designations where appropriate.

In this way, BLM can ensure that the planning decisions made through these processes best reflect the current conditions of the public lands and surrounding community, and make the most of the information and public input that will be gained through the extensive efforts already underway.

**Comment:** It is critical that BLM develop management plans for the NCAs that are worthy of the conservation priorities articulated by Congress. The NCAs were designated specifically to “conserve and protect” the spectacular diversity of species and ecosystems in these unique areas. These lands are areas where BLM’s multiple use mission is subordinated to the conservation purposes for which the lands have been protected.

**Comment:** it is vital that the St. George field office quantify all of the routes that it designates in its TMP, estimate the rate at which they will generate fugitive dust when not being traveled by vehicles, estimate the number of vehicles that will use each route, and the likely fugitive dust generation rate, and then model those figures to understand the true impacts of fugitive dust emissions. BLM must inventory likely fugitive dust emissions differentiated for PM10 and PM2.5 in order to begin to understand the true impacts of the activities envisioned and authorized in the TMP and RMP Amendment. In addition, BLM must perform dispersion modeling to know how individuals, plants, and wildlife will be affected by these activities and route designations. BLM must conduct these analyses now before any routes are designated that would result in violations of air quality standards. As an example, BLM has prepared models and more comprehensive emissions inventories in its Farmington, New Mexico; Vernal, Utah; and Roan Plateau, Colorado RMPs, and can do so now in its St. George TMP and RMP Amendment. This methodology for inventorying dust generation should also be applied to any other activity that will cause fugitive dust (e.g. grazing) in order to estimate total dust emissions in the planning area.

Furthermore, as part of NEPA’s “hard look” requirement, BLM must determine baseline pollutant concentrations and air quality conditions so that it, and the public, can fully understand the implications of proposed activities, including grazing and travel management decisions, on air quality in Washington County. To comply with this duty, BLM must accurately describe conditions and activities in the planning area. The TMP and RMP Amendment must list the correct background concentrations for ozone, PM2.5, and PM10, among other pollutants, and perform modeling for these pollutants now since it is possible that these pollutants could be present at unhealthy levels even before any additional management decisions are made.<sup>6</sup> Especially given Washington County’s arid, desert environment, it is particularly important that BLM incorporate drought conditions into its baseline and projected emissions inventories. BLM must assume that the rate of fugitive dust and pollutant generation will be even higher during times of drought, which are expected to occur with greater frequency and intensity in the arid southwest as the dastardly effects of climate change take hold.

**Comment:** Pursuant to federal statutes, the St. George land use plans must address water quality and comply with all applicable water quality standards. 43 U.S.C. § 1712(c)(8); 42 U.S.C. § 4332(C).

**Comment:** To comply with the new laws and guidance on climate change, the RMP Amendment, TMP, and NCA RMPs must include more than a superficial, cursory discussion of climate change, and must explain the most current science and discuss how climate change will impact the resources in the field office, including threatened species, desert habitat, and water resources. The plans must also describe how the decisions made and the activities permitted in the plans will contribute to climate change effects.

**Comment:** BLM Must Conduct a Thorough Analysis of the Impacts of Habitat Fragmentation, and Use this Information in its TMP to Mitigate These Impacts

**Comment:** All proposed plans should explain to the public the location of riparian areas and whether they will be subject to ORV use or other surface disturbing activities. Information available to the public

should include maps of riparian areas indicating which areas will be subject to ORV use and/or grazing. Because riparian and wetland areas are particularly sensitive to disturbance, the plans should look to limit, and ideally prohibit, ORV use and grazing as much as possible and must ensure that Proper Functioning Condition is maintained. Furthermore, BLM may not permit new surface disturbance near riparian areas. Utah BLM Riparian Policy at 4.

**Comment:** The BLM should make every attempt to seek public input and encourage the public to participate in the RMPA, RMPs and TMP, including holding workshops, making a preliminary range of alternatives available for public comment prior to issuing the draft planning documents, providing interim information regarding inventories of routes and visual resources, posting GIS files, and posting analyses such as ACEC evaluations and analysis of comments submitted on the draft to the planning website.

**Comment:** The BLM should identify the agencies and tribal and local government entities granted cooperating agency status and post this information on the planning website.

**Comment:** BLM should craft management objectives and prescriptions that protect and do not impair the conservation values of the adjacent Zion National Park. This should include, but is not limited to, the air quality and visibility impairment of the Park from actions occurring within the planning area. For example, BLM should designate the Zion Scenic Corridor ACEC as proposed by Citizens for Dixie's Future to help protect this important airshed.

**Comment:** The BLM must uphold its responsibility to protect the abundant natural values present in the planning area when developing management alternatives in the St. George RMPA and TMP, and in evaluating their environmental consequences, as required by both FLPMA and NEPA.

**Comment:** BLM must complete an inventory of values for which the NCAs were designated and specifically describe how each of these values are being protected in the RMP. To assist in this inventory we've included an example of one such inventory of objects completed for the Grand Staircase-Escalante National Monument. See, Attachment 1.

To comply with the legislation, current guidance, and FLPMA, as discussed above, all of the management alternatives must conserve NCA resources first, and then make other management decisions that do not interfere with their protection and conservation. Thus, in order to comply with these requirements, the range of alternatives cannot include management decisions that will undermine protection of NCA resources and purposes in favor of other resources or uses, or that will harm these values. The decisions made in the RMPs are critical to maintaining the ecological integrity of these lands and the survival of the species that inhabit them, protecting cultural resources, and providing opportunities for enjoyment and study by future generations that do not compromise their ecological values. Some of the lands encompassed by the NCAs have been impacted and degraded by a number of factors, including the proliferation of invasive species, habitat fragmentation, and fire. In order to ensure that the goals for establishing the NCAs are reached, protecting and restoring habitat must be a guiding principle for management decisions in order to ensure that the most fragile resources highlighted in the legislation are protected.

**Comment:** A revision, as opposed to just an amendment of the St. George RMP is justified to provide for a full assessment of the impacts of the decisions that the agency is in the process of making, as well as the changes in the underlying conditions and assumptions that formed the basis of the existing RMP, on the multiple resources and uses of the planning area and consideration of alternatives to provide for true multiple use and sustained yield. In developing and evaluating potential management alternatives, BLM should bear in mind the concept of multiple use, as defined above, in order to inventory and safeguard

resources such as scenic values, cultural resources and wildlife habitat and create ACECs and other appropriate administrative designations.

At a minimum, the purpose and need and the planning criteria for an RMP amendment should clearly provide for:

- inventory and protection of the many resources and uses that are affected by the new RMPs, the TMP, and a 60% increase in population;
- consideration of new information and changed circumstances that require changes in management from the current St. George RMP;
- thorough evaluation of potential impacts from decisions such as designation of the High Desert Off-Road Vehicle Trail and other roads and trails for motorized use, and development of appropriate mitigation measures for the range of values present in the planning area; and
- development of management alternatives that provide for special designations (such as ACECs and Special Recreation Management Areas – discussed in more detail below) and protective prescriptions for lands outside the NCAs;

In this way, the BLM can ensure that the planning decisions made through these processes best reflect the current conditions of the public lands and surrounding community, and make the most of the information and public input that will be gained through the extensive efforts already underway.

**Comment:** The BLM should limit use of adaptive management to appropriate situations (where the risk of failure will not cause harm to sensitive resources). An adaptive management program should comply with the guidelines set out above and the RMPA must fully explain, with sufficient detail, how BLM will employ adaptive management, what the “triggers” are for its use, what opportunities the public will have to participate in adaptive management decisions, and how the agency will fund the program.

**Comment:** BLM should use a multi-faceted approach to add new land and new protection to the NCA and increase the viability of the desert tortoise populations therein including:

- acquiring new BLM ownership rights to lands already existing in the NCA; and
- acquiring new habitat that may be added to the NCA in the future.

**Comment:** The amendment to the land use plan for this area provides BLM with an excellent opportunity to analyze the impacts from climate change to the planning area over the next two decades, as well as the contribution to climate change from management decisions made in the plan. This analysis should in turn lead to the development of thoughtful management prescriptions and alternatives in the land use plan that will address how BLM will mitigate these causes and adapt its management over the coming years to prevent permanent impairment and unnecessary or undue degradation to the resources in the face of climate change. The St. George Field Office will especially be informative in broader climate change research efforts and recommendations due to the nature of the landscape and ownership (i.e. mostly federally-owned lands of different gradients and levels of protection).

**Comment:** Climate Change

The BLM should evaluate the planning area for key vulnerabilities, and the nature of the climate threat to selected ecosystem elements should be fully examined and presented as part of the plan amendment

process in order to comply with its legal obligations under NEPA and other relevant laws and regulations. Such an assessment should include careful consideration of species and habitats of conservation concern.

**Comment:** A risk assessment conducted as part of the plan amendment should identify the direct and indirect modes of exposure to climate change and attempt to quantify them based on the best available science as required by NEPA and other laws and regulations.

**Comment:** Pursuant to NEPA, BLM should identify and document known sources of uncertainty and data needs and initiate action to fill those gaps at the earliest possible point in the RMP amendment process. Where data gaps remain, the plan should include strategies to reduce uncertainties.

**Comment:** BLM has a legal duty to prevent permanent impairment and unnecessary or undue degradation to the resources, and to manage the resources for the long-term needs of future generations. This obligation requires the agency to reduce the vulnerability of the ecosystem to the very real threats posed by climate change.

**Comment:** BLM has a legal duty to prevent permanent impairment and unnecessary or undue degradation to the resources, and to manage the resources for the long-term needs of future generations. This obligation requires the agency to reduce exposure of the ecosystem to the very real threats posed by climate change.

**Comment:** Reducing uncertainty of baseline conditions and the impacts of management in the face of climate change should be a major priority of any risk management strategy set forth by the agency to reduce the risk posed by climate change. BLM should build in robust research, monitoring, adaptive management, and scenario planning into the land use plan in order to address this challenging aspect of risk management.

**Comment:** The Wilderness Society also endorses and requests BLM incorporate the management proposals submitted by others for designation of:

1. Zion Scenic Corridor ACEC
2. Virgin River ACEC
3. Gunlock-Squaretop ACEC
4. Santa Clara River ACEC
5. Moody Wash ACEC
6. Bull Valley SRMA
7. Beaver Dam, Pine Valley and Black Ridge ACECs for Wildlife Corridors
8. Beaver Dam Slope, Red Cliffs, and Zion Gateway ACECs for protection of desert tortoise

**Comment:** 13. Facilitate a committee of: Users, County, State and Federal people to chart long term goals and have the ability to change management plans, where and when needed.

**Comment:** 14. Allow new data to be submitted during the complete process.

**Comment:** My name is Todd Edwards and I am the Washington County Engineer. John Willie, the Washington County Special Planner, and other staff have been working on updating the Washington County General Plan over the past year. We have previously submitted to your office a GIS map of our county roads that will be incorporated into the 2010 General Plan. Portions of the plan have been submitted to the Planning Commission, including the section concerning the Bureau of Land Management (Section III). The planning commission has reviewed and made comments about section III, however it has not been through the public hearing process nor formally approved and adopted by the County Commission. The planning commission has agreed with me that we should submit this draft version of Section III to you as a comment concerning your scoping process for the Beaver Dam Wash and Red Cliffs NCAs. I have attached the document to this email. It addresses how the county believes we can best work with the BLM in managing the resources of Washington County. Please consider the ideas in this document in your planning process. In addition to transportation; utility corridor, trails, fire management, and addressing other areas of needed cooperation are discussed in the eighteen pages of this section of the General Plan. Specific concerns are referenced in addition to the general guidelines. Please keep us informed as to the progress of your planning process. We would like to be involved as much as possible.

**Comment:** the Bureau of Land Management (BLM) should consider the impacts the plan might have on important water resources and the ability to develop those resources, including the Ash Creek Project (including a pipeline from the existing Ash Creek Reservoir to a new reservoir to be located near Anderson Junction), the Warner Valley Reservoir Project, the Lake Powell Pipeline Project and the Navajo Aquifer. The plan should also preclude further limitations on management options that might affect the ability to access important potential groundwater reserves in the western portion of Washington County. And the plan should abide by the Wild and Scenic Rivers Act by removing any wild and scenic river management of segments not included in the OMNIBUS PUBLIC LAND MANAGEMENT ACT OF 2009 (the Act).

**Comment:** Similarly, the supply of electricity necessary to serve water facilities is also dependent upon facilities that must necessarily be located within the Red Cliffs NCA. The efficient and economical supply of electricity is essential to the efficient and economical supply of water. The need to allow these facilities to be protected and, to the extent necessary, further developed, should not be diminished by amendments to the RMP.

**Comment:** Designations for motorized off-highway vehicle (OHV) travel should also take into account the need to access water and power facilities, current or planned. Likewise, the Comprehensive Travel and Transportation Management Plan, should include specific route designations to access these facilities.

**Comment:** The RMP process should also consider water issues in the western part of Washington County, in particular groundwater resources that are scarce and valuable and the impacts the RMP might have on exploration and development of such resources.

**Comment:** The "Omnibus Public Land Management Act of 2009" that created the Red Cliffs NCA provided for consultation with local governments in developing the management plan and also authorized the incorporation of provisions of the HCP. The Act also provided that "Nothing in this section prohibits the authorization of the development of utilities within the National Conservation Area if the development is carried out in accordance with" the utility development protocols of the HCP. Clearly, the Act is consistent with the HCP in recognizing the importance of these utilities to the local communities and to the support of these communities for the success of the HCP and the NCA. The resource conservation and protection goals can be met while also honoring the established commitments to utility development and maintenance set forth in the HCP.

**Comment:** We support Vision Dixie's Principle #7: Direct growth inward. The BLM can support this as well by keeping those BLM areas that abut agricultural neighborhoods as open to equestrian activity.

**Comment:** By following the current HCP protocol and working closely with the various interested parties, the City as well as other utilities in the area has successfully completed maintenance activities and new installation projects over the past several years since the formation of the Red Cliffs Desert Reserve. This has allowed the utilities to meet the growing demand for services in the City and Washington County in general while minimizing impacts to the affected protected areas.

**Comment:** Over the past several years two joint study reports from the SWUTTF have been developed:

1. Washington County, Utah - Joint Planning Study Report - December 2007
2. Southwest Utah Joint Planning Study Report- June 2009

Included with this letter are copies of both of these studies. One of the major points of consideration in the studies was to minimize the number of transmission lines in the Red Cliffs Reserve and the county as a whole. After a detailed process that evaluated all options, the joint task force long-term plan concluded that a 345 kV transmission line from Sigurd to Three Peaks (near Cedar City) to Hurricane West to St. George (located in the Red Cliffs NCA) substations is necessary for the reliable service of electric power to Washington County. As part of this transmission line the Hurricane West substation would need to be constructed. The portion of the project from Hurricane West to St. George would replace the need for up to three (or more) lower voltage 138 kV lines, from the St. George substation, with only one 345 kV line, thus reducing the footprint for transmission facilities throughout the area. This 345 kV line should be included in the planning process as a reasonably foreseeable action. A portion of the new Hurricane West to Three Peaks line may also pass through the NCA. It should be noted that the location of the Hurricane West substation and the new transmission line from the St. George substation to Hurricane West have not been selected or finalized. All locations indicated are conceptual in nature at this point.

**Comment:** Presently all of the main power transmission feeds and one of the major water source transmission pipelines for Washington County pass through the study area. Therefore, the City strongly advocates that the BLM retain existing designated utility corridors and consider designation and use of new major utility corridors as acceptable future actions in the resource management planning process so that construction of future water and high voltage power projects located within the study area would not require plan amendments. The possibility of collocating some of the required new water and power facilities with other needs in the NCA, such as the transportation needs, can and should be considered.

**Comment:** The City also encourages the BLM to consider alternative utility corridors that are not already congested with existing utilities. While collocating linear facilities may appear to be good planning, the net outcome may be a less reliable system which would necessitate construction of additional facilities in distinct geographic areas away from existing facilities thereby compromising the Federal Land Policy and Management Act's (of 1976) objective to discourage the proliferation of right-of-way. Currently the single major transmission path from the Central/Red Butte to St. George substations is the only transmission path for all of the customers in the St. George area. This is a significant problem for the delivery of electricity to these customers because this path has experienced several complete outages in recent years due to wildfires resulting in extended outages lasting up to several hours. An important function of the planned new Three Peaks to Hurricane West to St. George 345 kV transmission line described above is to provide a more reliable and robust delivery system to serve the ongoing growth in the area. This path will provide a "loop" feed allowing continued service in the area in the event one path has a disruption of service.

**Comment:** The City respectfully requests that the planning process allow for the continued use of existing roads allowing access to utility facilities rights of way for the performance of inspections and ongoing operation and maintenance activities.

**Comment:** As you write this critical plan, I hope you will emphasize the conservation of these fragile lands, protecting the soils, plant communities, and wildlife.

**Comment:** After a detailed process that evaluated all options, the joint task force's long-term plan concluded that a 345-kV transmission line from Sigurd to Three Peaks to Hurricane to St. George substations is necessary for the reliable service of electric power to the County. As part of this transmission line the Hurricane West substation will need to be constructed. The portion of the project from Hurricane West to St. George would replace the need for up to three, lower voltage 138-kV lines with a single, 345-kV line, reducing the footprint for transmission facilities throughout the area. This 345-kV line should be included in the planning process as a reasonably foreseeable action. Deseret and Dixie (and, perhaps, other members of the joint task force) are willing to meet with the St. George Field Office to discuss this important project in more detail.

**Comment:** Deseret also encourages the BLM to consider alternative utility corridors that are not already congested with existing utilities. While co-locating facilities in common right-of-ways may appear to be good planning, the net outcome is a less reliable system, which may necessitate construction of additional facilities in distinct geographic areas away from existing facilities (thereby compromising the Federal Land Policy and Management Act's objective to discourage the proliferation of rights-of-way). At present, there is a single major transmission path (Central to St. George substations) to serve the St. George area load of all three electric suppliers (Rocky Mountain Power, UAMPS, and Deseret). This reliance on a single path has posed a significant problem for the reliable delivery of power to these customers. This path has experienced several outages in recent years due to the wildfires, resulting in extended outage lasting up to several hours. An important function of the planned new, 345-kV transmission line described above (involving Hurricane West) is to provide a more reliable and robust delivery system to serve the ongoing growth in the area. This path will provide a "loop" feed allowing continued service in the area in the event one path has disruption to service.

**Comment:** In addition, for the existing and proposed transmission facilities, Deseret would like the planning process to incorporate the ongoing operation and maintenance requirements of all utility facilities. Allowing normal operation and ongoing routine maintenance of facilities without imposing burdensome, inflexible limitations can reduce unscheduled interruptions to service and the need for larger, corrective maintenance actions. Deseret requests that the planning process allow for the continued use of all existing roads allowing access to utility rights-of-way for the performance of inspections and ongoing operation and maintenance activities.

**Comment:** I have been a resident of Washington County my whole life @7 years) and I am an advocate for preserving our environment, but not to the extent that we lose the ability as residents to use the lands for public use. The purposes of the National Conservation Areas (NCA) are to conserve, protect and enhance the lands for the benefit of present and future generations. The resources we are conserving, protecting and enhancing are, ecological, scenic, wildlife, recreational. cultural, historical, natural, educational and scientific. None any more important or less important than the others, Historically there have been many families make their living by being able to use the public lands. Roads that have been used in the past should remain open to motorized vehicles as well as hikers areas that have been used to graze animals should remain that way. Please let's not make it so we limit the ability of everyone to use the public lands as they are intended.

**Comment:** This letter is to inform the St George field office of the BLM that the Paiute Indian Tribe of Utah (PITU) and the Shivwits Band of the Paiutes have strong interests in the future management of public lands in Southern Utah and plan to submit comments in the coming weeks to help guide the management of the legislated amendments to the 1999 St. George Resource Management Plan.

PITU is currently in the process of interviewing elders toward the goal of developing a "Paiute Land-Use Plan, which will assess the important role which public lands and natural resources play" maintaining Paiute culture and the connections which have developed to this land over thousands of years. As this is developed in the coming years, PITU hopes to work with the BLM to discuss these lands and uses of them by Tribal members. In the current NEPA analysis, the tribe anticipates making specific recommendations to guide the management of Areas of Critical Environmental Concern (ACEG), roadless areas which have not been designated as wilderness in the Washington County legislation, Transportation and Travel Management Planning, and the creation of Resource Management Plans for Beaver Dam Wash NCA and Red Cliffs NCA. In general, PITU elders and leaders want to see their ancestral landscapes protected from developments and managed to ensure long-term sustainable use by PITU members and the larger public. General recommendations from the Tribe include:

- 1) Protection of cultural antiquities, native plants, and wildlife
- 2) Assurances of access to public lands for utilization of these areas for hunting, fishing, gathering, and carrying out ceremonial/spiritual practices, and
- 3) Opportunities to recommend and/or be involved in the management of PITU interests across the landscape.

**Comment:** Please follow the suggestions of Citizens for Dixie's Future and implement "Vision Dixie" as they have outlined it. It has been thoroughly and thoughtfully researched and represents what is best for the area.

**Comment:** With the designation of wilderness areas and NCAs, within very close proximity to developed areas, it is our feeling that fire suppression guidelines and fire management prescriptions need to be addressed in the planning effort. One major concern is imposing restrictions on suppression efforts in wilderness and other natural areas that preclude the use of the most appropriate and effective suppression tools. With the wilderness areas and NCAs more hands-off approach to management, there is a concern that management of natural fire could have very serious and long-lasting consequences.

An example is the disaster that occurred in New Harmony in the summer of 2009, where appropriate tools were restricted until after homes and property were destroyed. Managers and fire suppression personnel must have the latitude and flexibility to employ the most appropriate and effective tools and to employ them when the need and opportunity is presented. Failing to act quickly and decisively during a fire event can have far-reaching and disastrous consequences. Other issues include pre-suppression efforts and techniques that need to be considered and evaluated to allow maximum advantage should fires start. Some of these include the need to maintain or have appropriate access available for equipment and personnel to allow rapid response and aggressive suppression.

**Comment:** The effort to identify roads and ways that are open to vehicles should not preclude using existing routes for fire and emergency access in critical habitat or other normally restricted areas. Access to and use of available water sources for fire suppression should be considered and evaluated. Such opportunities might include use of the several springs and pipelines on the Beaver Dam Slope for example. Using existing storage facilities or even constructing additional storage that could serve multiple purposes and be available for suppression efforts would be very beneficial and proactive for fire

suppression on the Beaver Dam Slope, including the NCA. It would be important to access those facilities and use them in support of helicopter operations within roadless or even wilderness areas for example.

The planning effort should also evaluate all options available in establishing defensible space and fire breaks, including chemical, mechanical, and biological methods. Serious consideration for the use of both native and non-native species to create "green strips" must be part of the effort. The use of non native species even within the NCAs and wilderness areas, to accomplish rehabilitation or create fire-resistant barriers or buffers is a necessity for the tool bag of managers.

The need to find means to compete with the fire promoting invasive annual grasses that have in themselves altered the natural ecological processes within most, if not all, of the plant communities of the county, including the Beaver Dam Slope and Red Cliffs NCAs, is paramount. Without the ability to use known, and yet to be determined, plant materials, be they native or non-native, in the fight against these prolific species will leave us vulnerable to loss of the native plant communities and dependant species that we are trying to protect.

**Comment:** The City supports the planning process and requests to actively participate in the process to make sure the ultimate plan contains adequate provisions for water and power supply facilities, with are needed to provide reliable service to the citizens of the City.

**Comment:** The City has reviewed the comments submitted to your office from, the City of St. George, Washington County Water Conservancy District, Rocky Mountain power and UAMPS. Washington City fully endorses these entities and their comments.

**Comment:** 2. Solutions

A. Integrate the Vision Dixie Principals into the Plans

The RMP amendment is an opportunity to implement the Vision Dixie Principals and the federal mandate into standards, guidelines to protect natural areas in the county.

**Comment:** 3. Approach to Planning

A. Management Zoning

B. Benefits-Based Planning & Management (BBM)

C. Travel Management Zones

D. Special Area Zones

E. Adjacent Lands

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. CDF suggests this is the best response to solve issues in this planning effort.

CDF recommends BLM adopt a zoning concept for the whole St. George Field Office area. These management zones would not trump any underlying resource values, but instead would serve as an additional tool in the decision tree matrices and would serve as a set of goals and objectives for the future

management of the lands within. lands and travel options could be simplified into five primary zone types for different priorities and experiences; motorized recreation zones, passage zones/ motorized backcountry zones; primitive zones; and pristine zones. It could make management of the district easier over the long term. (see Exhibit "T1" Travel and Transportation Zoning Map)

**Comment:** L. Adequate Funding

BLM must include a fiscal analysis of alternative implementation and mitigation, and restoration costs. Of utmost importance is sufficient funding to enable enforcement of designated routes and closures, with a comprehensive education and outreach efforts ranging from readily available travel maps to on-line information and rider education courses.

The BLM needs to consider budget constraints when evaluating each management alternative as part of the NEPA process. This will require more detail as to where money will be spent, which programs will be fully funded and which ones will not. Planners should, for example, estimate the labor and capital costs of fully mitigating the environmental consequences that will result from implementing each management alternative. By ignoring budget constraints, the plan presents the public with an unrealistic picture of what would be accomplished given limited financial resources.

**Comment:** CDF recommends the Colorado Canyon NCA Management plan as 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.

**Comment:** The RMP Amendment must analyze the management alternatives in terms of cumulative impacts to the NCA objects and from the roads and trails. NEPA dictates that the BLM take a "hard look" at the environmental consequences of a proposed action, and the requisite environmental analysis "must be appropriate to the action in question". In order to take the "hard look" required by NEPA BLM is required to assess impacts and effects that include: "ecological (such as the effects on natural resources and on the components, structures, and functioning of affected ecosystems), aesthetic, historic, cultural, economic, social, or health whether direct, indirect, or cumulative. BLM should consider the following cumulative actions over the life of the plan:

1. What will be the cumulative impact of designating the High Desert OFIV Trail and its impact over time on the fragile desert landscape?(including the popular Tri-Stab ATV Jamboree, Rhino Rally motorcycle events and races)
2. What will be the impacts of the Southern Corridor Highway and Lake Powell Pipeline right-of-way opening up more areas for ATV use have in sensitive areas? And its impact they may have on special status species plant and wildlife habitat.
3. What will be the impact from Quail Lake Stab Park promotions that will also increase ATV use, which had 95,239 visitors in 2008?
4. Since Washington County already has a fugitive dust problem and high ozone levels in the summer. BLM must consider the impact of increased OHV use on dirt roads on air quality causing higher levels of suspended dust over the life of the plan as well as increased gas emissions. "Recent studies indicate that road dust may contribute substantially to visibility impairment throughout the Colorado Plateau." In the summer, the county also has high ozone levels in the St George valley from vehicle emissions.
5. Impacts of dust from OHV use on water quality and reducing snow pack?

6. What are the current and future impacts of OHV use in ACECs and riparian areas?
7. What will be the impact of OFIV trails on critically eroding soils?
8. How will OFIV travel routes spread noxious weeds? OHV travel can dramatically increase the transport of invasive weed seeds. The Montana State University, Center for Invasive Plant Management, Dr. Lisa Rew conducted a study and they saw that OHVs were capable of picking up as many as 200,000 seeds over 48 miles of travel.
9. Impacts of vandalism of historic structures from OHV trails
10. Impacts of scarring the landscape from unmanaged OHV use
11. Impact on wildlife from OHV noise. A study in March 2010 issue of the journal *Trends in Ecology and Evolution*, found anthropogenic noise affects wildlife by interfering with animals' abilities to mate, avoid predators, locate prey, forage and perform other essential behaviors. And that noise has increased substantially in recent decades, both in reach and intensity.

**Comment: F. Water Resources**

Close OHV use to Curly Hollow and Frog Hollow critical watersheds and specific areas of critically eroding soils. Include maps of the critical watershed areas in the Plan Amendment. The 1999 RMP did not include these maps.

**Comment:** BLM should proactively manage both the quality and quantity of water resources. FLPMA establishes a general requirement that land use planning and the resulting plan provide for compliance with "pollution control laws." 43 U.S.C. S 1712(c)(8). Compliance with the Clean Water Act (CWA) is an important element of this requirement

**Comment: B. Climate Change**

The plan Amendment must anticipate the impact of climate change over the life of the plan on natural resources.

**Comment:** GPS & physically look at the roads and make a comprehensive travel plan.

**Comment:** Existing routes and trails need to be GPS'd and included in a comprehensive route inventory (many are already gone!).

**Comment:** I would really like to understand the wilderness study area on Canaan Mtn. I think that the trail out on Canaan should remain open. There is a lot of history on that mountain. I would like to see the Sawmill Trail remain open to OHV usage. Also there are many side roads used for hunting on that mountain. They also need to remain open. The other main trail is the Mail Drop. This trail also needs to remain open. I think we need to map all the roads and trails that are in use now and get them on a map so people can use them for any type of recreation.

**Comment:** Smith Mesa has a road/trail off the eastern side - not on the map. Add to map.

**Comment:** The off highway designation maps displayed were slightly misleading. The National Park & Forest area aren't marked in any way, as far as access is concerned. Just glancing at the maps would lead one to believe most of the area of the map is not closed to vehicles.

**Comment:** As search & rescue we are very concerned in preserving routes and trails. Many of them not on maps. We will take your staff or equipment out to verify trails in this RMP free of charge. We have very extensive knowledge of routes that make our job easier in the event of an emergency. Please call and we will also contact you with the routes we have available in GPS form.

**Comment:** Our main areas of concern, which will affect the public, in regards to, motorized recreation. We have extensive knowledge of the area. We use routes and trails county wide very extensively. We use these routes mainly for recreation. We have an extensive collection of GPS data for the Washington county area.

In Washington County we have many areas off limits to motorized recreation. We believe what still exists can be managed responsibly with protection of ACES. In our perspective we need to manage and preserve any and all routes that currently exist. Many existing trails may not be on your maps or were excluded from the 1999 RMP because the BLM did not know they existed. PLEAA and/or many of the local clubs will offer assistance and guidance on areas of concern. Your office has a great working relationship with the motorized community and we would like to see that relationship continue. We feel it is the responsibility of the BLM to take into consideration every known route as part of this plan and to include them as part of the High Desert ATV trail system. Many trails have connector routes and you can nearly ride anywhere in the county if you know what route to travel.

**Comment:** 1. Extensive work has been done to prepare a “Washington County OHV Map” which is currently being distributed at the St. George Field Office. This map shows a large percentage of the motorized recreation routes in the county – but not all. I would urge BLM to use this as a minimum base map and add additional routes that will be gained in the public scoping process.

**Comment:** 1. Include a map in the draft plan showing the areas BLM found to have wilderness characteristics. No consideration of wilderness designation is involved, but the information on wilderness values tells decisionmakers something about the resources of the area, and it can help BLM make decisions about appropriate uses in the new plan.

**Comment:** Could you send me topographical maps of the current ACECs in Washington County? It is hard to tell the boundaries from the 1999 RMP map.

**Comment:** This is a general question but would like to know how it would affect the St. George plan. Will the BLM accept old geodetic survey maps and present day satellite maps with road and trail designations or will these have to be individually pointed out as being under current use even though a satellite map can not lie.

**Comment:** Per our conversations at the open house, we will be electronically submitting maps of the many trails that we ride.

# APPENDIX B — FEDERAL REGISTER PUBLICATION: NOTICE OF INTENT

25876

Federal Register / Vol. 75, No. 89 / Monday, May 10, 2010 / Notices

Presidentially Declared Disaster Assistance—Disaster Housing Operations for Individuals and Households; 97.050, Presidentialy Declared Disaster Assistance to Individuals and Households—Other Needs; 97.036, Disaster Grants—Public Assistance (Presidentially Declared Disasters); 97.039, Hazard Mitigation Grant.

W. Craig Fugate,  
Administrator, Federal Emergency  
Management Agency.  
[FR Doc. 2010-10976 Filed 5-7-10; 8:45 am]  
BILLING CODE 9111-23-P

## DEPARTMENT OF THE INTERIOR

### Bureau of Land Management

[BLUTC03000-16100000-LXSS004J0000]

#### Notice of Intent To Prepare Resource Management Plans for the Beaver Dam Wash and Red Cliffs National Conservation Areas and an Amendment to the St. George Field Office Resource Management Plan, and an Associated Environmental Impact Statement, Utah

AGENCY: Bureau of Land Management, Interior.

ACTION: Notice of intent.

**SUMMARY:** In compliance with the National Environmental Policy Act (NEPA) of 1969, as amended; Federal Land Policy and Management Act (FLPMA) of 1976, as amended; and the Omnibus Public Land Management Act of 2009 (Pub. L. 111-11), the Bureau of Land Management (BLM) St. George Field Office (SGFO), St. George, Utah, intends to prepare Resource Management Plans (RMP) for the Beaver Dam Wash and the Red Cliffs National Conservation Areas and an amendment to the St. George Field Office RMP. The BLM SGFO will prepare a single Environmental Impact Statement (EIS) to satisfy the NEPA requirements of this planning process. By this notice, the BLM is announcing the beginning of the scoping process to solicit public comments and identify issues.

**DATES:** This notice initiates public scoping for this planning process and associated EIS. Comments on issues may be submitted in writing until June 9, 2010. The date(s) and location(s) of any scoping meetings will be announced at least 15 days in advance through local media and at the following BLM Web site: [http://www.blm.gov/ut/st/en/fo/st\\_george.html](http://www.blm.gov/ut/st/en/fo/st_george.html). In order to be considered in the Draft RMPs and Draft RMP Amendment/EIS (hereinafter Draft Plans and Amendment/EIS), all comments must be received prior to the

close of the 30-day scoping period or 30 days after the last public meeting, whichever is later. We will provide additional opportunities for public participation upon publication of the Draft Plans and Amendment/EIS.

**ADDRESSES:** You may submit comments on issues and planning criteria related to this planning effort by any of the following methods:

- **Web site:** [http://www.blm.gov/ut/st/en/fo/st\\_george.html](http://www.blm.gov/ut/st/en/fo/st_george.html).
- **E-mail:** [utsgrmp@blm.gov](mailto:utsgrmp@blm.gov).
- **Fax:** 435-688-3252.
- **Mail:** Bureau of Land Management, Attn: Project Manager, 345 E. Riverside Drive, St. George, Utah, 84770.

Documents pertinent to this proposal may be examined at the SGFO.

**FOR FURTHER INFORMATION CONTACT:** For further information and/or to have your name added to our mailing list, contact Keith Rigrtrup, Project Manager, telephone (435) 586-2401, address Bureau of Land Management, 345 E. Riverside Drive, St. George, Utah 84770; e-mail [utsgrmp@blm.gov](mailto:utsgrmp@blm.gov).

**SUPPLEMENTARY INFORMATION:** This document provides notice that the BLM SGFO, St. George, Utah intends to prepare RMPs for the Beaver Dam Wash and the Red Cliffs National Conservation Areas and an amendment to the SGFO RMP with an associated EIS; announces the beginning of the scoping process; and seeks public input on issues and planning criteria. On March 30, 2009, Public Law 111-11 was signed into law. Section O of this legislation designated new units of BLM's National Landscape Conservation System in Washington County, Utah, including two National Conservation Areas (NCAs)—the approximately 63,500-acre Beaver Dam Wash NCA and the approximately 45,000-acre Red Cliffs NCA. The new NCAs have as their identified purposes, the conservation, protection, and enhancement of their ecological, natural, cultural/historical, recreational, scenic, educational, wildlife and scientific values, and to protect each species located in the NCA that is listed as a threatened or endangered species. The preparation of management plans for the two NCAs is mandated by Public Law 111-11 and will be completed through this planning effort. To bring the existing SGFO RMP into compliance with the new designations and mandates from Public Law 111-11, the SGFO proposes to amend the RMP to address specific issues and public land uses. The purpose of the public scoping process is to determine relevant issues that will influence the scope of the environmental analysis, including

alternatives, and guide the planning process. The plan amendment will be guided by the planning criteria and will identify the issues to be resolved, explain or identify the current management situation, desired resource conditions to be maintained or achieved, and the management actions necessary to achieve those objectives. Specifically, the plan amendment will consider changes to the Oil-Highway Vehicle (OHV) area designations (Open, Closed, and Limited) approved through the 1999 SGFO RMP. The plan amendment will also consider nominations for Areas of Critical Environmental Concern on public lands in Washington County "where biological conservation is a priority," pursuant to section 1979 of Public Law 111-11. Preliminary issues for the planning area have been identified by BLM personnel, Federal, state, and local agencies; and other stakeholders. The issues include: Air quality, management of Beaver Dam Wash NCA, management of Red Cliffs NCA, and priority biological conservation areas.

Preliminary planning criteria include:

1. The public planning process for these NCAs will be guided by Public Law 111-11, in addition to FLPMA and NEPA.
2. The BLM will use current scientific information, research, technologies, and results of inventory, monitoring, and coordination to determine appropriate local and regional management strategies that will enhance or restore impaired systems.
3. The Joshua Tree Instant Study Area within the Beaver Dam Wash NCA will be carried forward in all alternatives for management of the Beaver Dam Wash NCA and the area will continue to be managed under Interim Management Policy for Lands Under Wilderness Review.
4. The Joshua Tree National Natural Landmark within the Beaver Dam Wash NCA continues to be a valid designation and will be carried forward in all alternatives for management of Beaver Dam Wash NCA.
5. New Wild and Scenic River proposals will not be evaluated or analyzed in this plan amendment process. One suitable river segment under SGFO administration that was not designated into the National System of Wild and Scenic Rivers by Public Law 111-11 will continue to be managed in accordance with BLM Manual 8351 Wild and Scenic Rivers—Policy and Program Direction for Identification, Evaluation, and Management.
6. Area designations (Open, Closed, or Limited Use) for motorized recreation will be consistent with the BLM

National Management Strategy for Motorized OHV Use on Public Lands and transportation and travel management policy.

7. The designated OHV "Open" area of the Sand Mountain Special Recreation Management Area will remain Open under all alternatives of the plan amendment, consistent with the agreement for joint management by the State of Utah's Sand Hollow Reservoir State Park.

8. Motorized travel routes designated through the Red Cliffs Desert Reserve Public Use Plan (2001) will be carried forward under one or more alternatives.

9. At least one alternative will identify a "northern transportation corridor," as mandated by Public Law 111-11.

You may submit comments on issues and planning criteria to the BLM in writing, at any public scoping meeting, or you may submit them to the BLM using one of the methods listed in the ADDRESSES section above. In order to be considered in this planning process, all comments must be received prior to the close of the scoping period or 30 days after the last public meeting, whichever is later. Before including your address, phone number, e-mail address, or other personal identifying information in your comment, you should be aware that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so. The minutes and list of attendees for each scoping meeting will be available to the public and open for 30 days after the meeting to any participant who wishes to clarify the views he or she expressed. The BLM will evaluate identified issues to be addressed in the plan, and will place them into one of three categories:

1. Issues to be resolved in the planning process;
2. Issues to be resolved through policy or administrative action; or
3. Issues beyond the scope of this planning process.

The BLM will provide an explanation in the Draft Plans and Amendment/EIS as to why an issue was placed in category two or three. The public is also encouraged to help identify any management questions and concerns that should be addressed in the plan. The BLM will work collaboratively with interested parties to identify the management decisions that are best suited to local, regional, and national needs and concerns.

The BLM will use an interdisciplinary team approach in the planning process to consider the variety of resource issues and concerns identified. Specialists with expertise in the following disciplines will be involved in the planning process: Air quality, archeology, biology, botany, climate change, ecology, lands and realty, paleontology, recreation, socio-economics, and soils and vegetation.

Approved:  
Selma Sierra,  
State Director.

Authority: 40 CFR 1501.7, 43 CFR 1610.2.  
[FR Doc. 2010-10990 Filed 5-7-10; 8:45 am]  
BILLING CODE 4310-02-P

## DEPARTMENT OF THE INTERIOR

### Bureau of Land Management

[LLCAC069 L1711.0000 AL.0000 025E]

#### Notice of Intent To Solicit Nominations, Carrizo Plain National Monument Advisory Council, California

AGENCY: Bureau of Land Management, Interior.

ACTION: Notice of call for nominations.

**SUMMARY:** The Bureau of Land Management (BLM) is soliciting nominations from the public to fill positions on the Carrizo Plain National Monument Advisory Committee (MAC). MAC members provide advice and recommendations to the BLM on the management of public lands in the Carrizo Plain National Monument.

**ADDRESSES:** Nominations should be sent to the Monument Manager, Bureau of Land Management, Bakersfield Field Office, 3801 Pegasus Drive, Bakersfield, California 93308.

**FOR FURTHER INFORMATION CONTACT:** Johna Hurl, Monument Manager, Bakersfield Field Office, 3801 Pegasus Drive, Bakersfield, California 93308, (661) 391-6093, [Johna.Hurl@ca.blm.gov](mailto:Johna.Hurl@ca.blm.gov).

**SUPPLEMENTARY INFORMATION:** The MAC provides representative citizen counsel and advice to the Secretary of the Interior through the BLM with respect to the revision and implementation of the comprehensive plan for the Carrizo Plain National Monument.

The MAC consists of nine members:  
(1) A member of, or nominated by, the San Luis Obispo Board of Supervisors;  
(2) A member of, or nominated by, the Kern County Board of Supervisors;  
(3) A member of, or nominated by, the Carrizo Native American Advisory Council;

(4) A member of, or nominated by, the Central California Resource Advisory Council;

(5) A member representing individuals or companies authorized to graze livestock within the Monument; and

(6) Four members with recognized backgrounds reflecting:

- (a) The purposes for which the Monument was established; and
- (b) The interests of other stakeholders, including the general public, who are affected by or interested in the planning and management of the Monument.

Terms of three present MAC members (two public-at-large and one San Luis Obispo County Board of Supervisors) expire on August 25, 2010. Individuals may nominate themselves or others.

Nominees must be residents of the counties or neighboring county in which the MAC has jurisdiction. The BLM will evaluate nominees based on their education, training, and experience and their knowledge of the geographical resource.

The Obama Administration prohibits individuals who are currently federally registered lobbyists from serving on all Federal Advisory Committee Act (FACA) and non-FACA boards, committees or councils.

The following must accompany nominations received in this call for nominations:

- Letters of reference from represented interests or organizations;
- A completed background information nomination form; and
- Any other information that speaks to the nominee's qualifications.

Nominations will be accepted for a 45-day period beginning the date this notice is published.

Authority: FACA, 5 U.S.C. App. 2 and the Federal Land and Policy Management Act of 1976, 43 U.S.C. 1701 *et seq.*

Timothy Z. Smith,  
Field Manager, Bakersfield Field Office.  
[FR Doc. 2010-10984 Filed 5-7-10; 8:46 am]  
BILLING CODE 4310-40-P

## DEPARTMENT OF THE INTERIOR

### Bureau of Reclamation

#### Colorado River Basin Salinity Control Advisory Council

AGENCY: Bureau of Reclamation, Interior.

ACTION: Notice of public meeting.

**SUMMARY:** The Colorado River Basin Salinity Control Advisory Council (Council) was established by the Colorado River Basin Salinity Control

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## APPENDIX C — PRESS

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### PRESS RELEASE



For Immediate Release: May 12, 2010

Contact: Public Affairs Officer Rachel Tueller 435-865-3032

### *St. George BLM to Host Scoping Meetings for Management Planning Efforts*

**St. George** - The Bureau of Land Management's (BLM), St. George Field Office will host four public scoping meetings to kick off the preparation of management plans for the Beaver Dam Wash and Red Cliffs National Conservation Areas (NCAs), and an amendment to the St. George Field Office Resource Management Plan (RMP), approved in 1999. A single Environmental Impact Statement (EIS) will be prepared to support these planning efforts.

The St. George BLM Field Office is excited to lead the development of the 45,000 acre Red Cliffs NCA and the 63,500 acre Beaver Dam Wash NCA, both established with the passage of the Omnibus Public Land Management Act of 2009, P.L.111-11. Our planning efforts will strive to protect, enhance and conserve the ecological, natural, cultural/historical, recreational, scenic, educational and scientific values of public lands with an emphasis on the protection of federally listed-threatened and endangered species. These planning efforts will allow the BLM and local communities to creatively develop management goals and objectives for these unique and popular local ecosystems. This planning effort would also identify one or more alternatives for a "northern transportation route" in Washington County.

As part of this multi-faceted planning process, the St. George Field Office will also amend its current RMP to address specific public land uses and other legal requirements of P.L.111-11. The plan amendment will consider changes to the Off-Highway Vehicle area designations (Open, Closed, and Limited) approved through the 1999 RMP. Implementation planning (including alternatives) for specific routes within the area designations will occur through a separate Environmental Assessment (EA). The plan amendment will also consider nominations for new Areas of Critical Environmental Concern (ACECs) on public lands in Washington County where biological conservation is a priority.

This planning process will seek input from many municipal, county, and state government entities, American Indian Tribes, other federal agencies, and the general public. Cooperating agencies currently include: Mohave County, Washington County and the State of Utah. The St. George Field Office will use an interdisciplinary team approach in the preparation of the new plans, including the amendment.

Four scoping meetings will be held to provide the public with opportunities to learn about the plans that are to be developed and to share any information, concerns, or comments they may have. The meetings

will be in an open house format and representatives from BLM's St. George Field Office will be available to answer questions. The meetings are scheduled from 6pm to 8pm on the following dates at these locations:

**St. George - Monday, June 14, 2010**

Dixie Center  
1835 Convention Center Dr.  
St. George, UT

**Mesquite, Nevada - Tuesday, June 15, 2010**

Mesquite Community and Senior Center  
102 West Old Mill Road  
Mesquite, NV

**Hurricane - Wednesday, June 16, 2010**

City of Hurricane Office  
147 North 870 West  
Hurricane, UT

**Salt Lake City - Thursday, June 17, 2010**

Salt Lake City Public Library  
Conference Room – Level 4  
210 East 400 South  
Salt Lake City, UT

The public scoping period began on May 10, 2010 and ends on July 19, 2010. Written comments may be submitted at the scoping meetings, by letter to the address below, or by e-mail to [utsgrmp@blm.gov](mailto:utsgrmp@blm.gov). Please include "Resource Management Plan Amendment for the St. George Field Office, Utah and associated Environmental Impact Statement" in your correspondence. All comments must be received on or before the close of business, July 19, 2010.

Attention: Planning Project Manager  
c/o Bureau of Land Management  
St. George Field Office  
345 East Riverside Drive  
St. George, UT 84770

Before including your address, phone number, email address, or other personal identifying information in your comment, you should be aware that your entire comment, including your personal identifying information, may be made publicly available at any time. While you may ask us in your comment to have your personal identifying information withheld from public review, we cannot guarantee that we will be able to do so.

Please contact BLM Planner Keith Rigtrup at (435) 586-2401 to request additional information regarding the meetings.

-BLM-

The BLM manages more land – 253 million acres – than any other Federal agency. This land, known as the National System of Public Lands, is primarily located in 12 Western states, including Alaska. The Bureau, with a budget of about \$1 billion, also administers 700 million acres of sub-surface mineral estate throughout the nation. The BLM's multiple-use mission is to sustain the health and productivity of the public lands for the use and enjoyment of present and future generations. The Bureau accomplishes this by managing such activities as outdoor recreation, livestock grazing, mineral development, and energy production, and by conserving natural, historical, cultural, and other resources on public lands.

# NEWS ARTICLES RELATED TO THE SCOPING MEETINGS

BLM to host scoping meetings | thespectrum.com | The Spectrum

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## BLM to host scoping meetings

Tuesday and Hurricane city office on Wednesday.

BY THE SPECTRUM DAILY NEWS •  
sports@thespectrum.com • June 11, 2010

The Bureau of Land Management's St. George Field Office will host four public scoping meetings to kick off the preparation of management plans for the Beaver Dam Wash and Red Cliffs National Conservation Areas and an amendment to the St. George Field Office Resource Management Plan approved in 1999.

A single Environmental Impact Statement will be prepared to support these planning efforts.

The St. George BLM Field Office is excited to lead the development of the 45,000 acre Red Cliffs area and the 63,500 acre Beaver Dam Wash area, both established with the passage of the Omnibus Public Land Management Act of 2009.

The BLM says the planning efforts will strive to protect, enhance and conserve the ecological, natural, cultural, historical, recreational, scenic, educational and scientific values of public lands with an emphasis on the protection of federally listed-threatened and endangered species. These planning efforts will allow the BLM and communities to creatively develop management goals and objectives for these unique and popular local ecosystems. This planning effort would also identify one or more alternatives for a "northern transportation route" in Washington County.

As part of this multi-faceted planning process, the St. George Field Office will also amend its plan to address specific public land uses and other legal requirements. The plan amendment will consider changes to the off-highway vehicle area designations approved through the 1999 plan. Implementation planning for specific routes within the area designations will occur through a separate Environmental Assessment.

The meetings will be in an open house format and representatives from the BLM St. George Field Office will be available to answer questions.

The meetings are scheduled from 6 to 8 p.m. on the following dates at these locations: Dixie Center on Monday, Mesquite Community and Senior Center on

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<http://www.thespectrum.com/apps/pbcs.dll/article?AID=20106150308>

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## Public provides input

BY DAVID DEMILLE • [ddemille@thespectrum.com](mailto:ddemille@thespectrum.com)  
• June 15, 2010

ST. GEORGE - Stakeholders of all kinds showed up in St. George Monday to discuss how federal managers should handle newly designated conservation areas in Washington County.

The Bureau of Land Management has started the three-year process of implementing the provisions of a massive lands bill passed last year by Congress, which designated 256,338 acres of public lands as wilderness.

New management plans are needed for the Red Cliffs Desert Reserve and Beaver Dam Wash, both of which were classified as National Conservation Areas by the 2009 bill, and a complete and comprehensive Travel and Transportation Management Plan must be developed to designate road systems for both off-highway vehicles and mechanical uses such as biking.

Officials were asking for public input early in the process with a series of meetings this week, and in a county where public lands play such a large role in peoples' lives, input wasn't hard to come by.

Freddy Dunn, with the Backcountry Horsemen of Utah's Southwest Chapter, led a group of horseback riders hoping to preserve the area's trails and perhaps stake out new ones through the new management plans.

"We're looking to the BLM to make sure we have the access we've enjoyed in this beautiful area," she said.

She said the organization's leaders are watching the Washington County situation closely, as it could serve as an example for future land use agreements.

Hikers, bikers, ranchers, photographers, climbers and a host of others were at the meeting, leaving written comments on how they would like to see the plans develop, as the general outline of the new designations touch on every use of the lands. As defined by Congress, the new conservation areas are "to conserve, protect and enhance for the benefit and enjoyment of present and future generations the ecological, scenic, wildlife, recreational, cultural,

historical, natural, educational and scientific resources," of each site.

While the bill calls for the BLM to preserve current uses of the lands, environmental sensitivities could impact how the plans are made.

Don Black, an off-highway vehicle enthusiast from Kanab, said he had been following the process for some time, trying to map out roads and define areas where OHV use should continue under the new management plans.

"These travel management plans are essential to making sure we have access to roads," he said.

Dave Nice, a mountain biker from Hurricane, said he hoped to see the county maintain its well-known biking hot spots and develop new ones as the process moves forward.

"I really think Washington County is right at the cusp of becoming a worldwide destination for mountain biking and I want to make sure we preserve what we have," he said.

As managers develop resource management plans, they must take into consideration resource protection, endangered species, habitat restoration and scientific research needs, but they also want to consider the public's desires for the lands, said Jimmy Tyree, field manager for the BLM's St. George office.

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6/23/2010

<http://www.thespectrum.com/apps/pbcs.dll/article?AID=20106150308>

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He said these preliminary "scoping" meetings have a twofold objective: A to get information out and answer questions about the bill first, then to take the comments from the public to help develop the plans.

"It's what do we need to know so that we're responding to their plans and their concerns," he said.

The BLM has three more meetings scheduled this week, with the comment period for this phase in the implementation process to last until July 19.



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6/23/2010



## Public lands subject of scoping meeting tonight

June 14, 2010

ST. GEORGE – Starting tonight, the Bureau of Land Management is hosting a series of scoping meetings meant to gather input from the public on the implementation of the Washington County Growth and Conservation Act.

Conducted in an open-house format, the meetings will give residents a chance to speak personally with BLM representatives, as the agency embarks on what could be a three-year effort to implement the changes outlined in the lands bill. Anyone who hikes, bikes, runs, rides horses, takes photos, climbs rocks or does anything else within the county's vast public lands could be affected.

The act was one of more than 170 actions contained in a massive omnibus public lands bill passed by Congress a year ago. The work of years of negotiation and public involvement, including the community-oriented Vision Dixie effort, the deal designated 256,338 acres of county lands as wilderness, with 5,000 pegged for development.

The bill lays out the protection and development future for much of Washington County, including the creation of two new conservation areas, protection for parts of the Virgin River and its tributaries, the transfer of land into a trust for the Shivwits Band of Paiutes, and the creation of a new trail for off-highway vehicles.

### Public meetings

The BLM will have four scoping meetings this week to provide information and gather input from the public on the implementation of the Washington County Lands Bill. Each meeting is scheduled for 6 p.m. to 8 p.m.

\* Monday (today): Dixie Convention Center, 1835 Convention Center Dr., St. George.

\* Tuesday: Mesquite Community and Senior Center, 102 West Old Mill Road, Mesquite.

\* Wednesday: City of Hurricane offices, 147 N. 870 West, Hurricane.

\* Thursday: Salt Lake City Public Library, Conference Room – Level 4, 210 East 400 South, Salt Lake City.

Written comments are also accepted until July 19, by e-mail to [utsgmp@blm.gov](mailto:utsgmp@blm.gov), or by mail to:

Attention: Planning Project Manager  
c/o Bureau of Land Management  
St. George Field Office  
345 E. Riverside Dr.  
St. George, UT 84770

Please include "Planning Process for St. George Field Office" in the correspondence.

### On the Web

\* Visit [www.blm.gov/ut/st/en/fo/st\\_george.html](http://www.blm.gov/ut/st/en/fo/st_george.html) for more details and contact information.

\* Maps of the wilderness and conservation areas designated in the Washington County Growth and Conservation Act are available at <http://gis.utah.gov/sgid>. Click on the link to "Info & Change Log" and then the link to "Admin Boundaries." Washington County maps are listed on the right side of the page, several articles down.

\* Visit [www.citizensfordixie.org](http://www.citizensfordixie.org) for information, maps and other resources on the implementation process from Citizens for Dixie's Future.

\* Review the 10 principles of Vision Dixie at [www.visiondixie.org](http://www.visiondixie.org).

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# APPENDIX D — PLANNING NEWSLETTER

Bureau of Land Management - St. George Field Office

## St. George

Planning Process

May 2010

### National Conservation Area Resource Management Plans

The Bureau of Land Management's (BLM) St. George Field Office is initiating land use and resource management planning, in response to the Omnibus Public Land Management Act of 2009 (the Act). Section O of the Act designated the 63,500 acre Beaver Dam Wash National Conservation Area (NCA) and the 45,000 acre Red Cliffs NCA, on public lands in Washington County, Utah, and directed BLM to prepare Resource Management Plans (RMPs) for each NCA. The Congressionally-defined purposes of the new NCAs are: *"to conserve, protect, and enhance for the benefit and enjoyment of present and future generations the ecological, scenic, wildlife, recreational, cultural, historical, natural, educational, and scientific resources"* of each unit. Public input is needed to assist the St. George Field Office to identify alternatives for long term NCA management that are consistent with the goals of resource conservation and protection. Issues to be considered in the RMPs will include:

- Resource protection and desired future conditions
- Species conservation
- Habitat restoration
- Research needs and opportunities
- Sustainable recreation
- Interpretation and public education



### What is a National Conservation Area?

National Conservation Areas (NCAs) are public lands administered by BLM that have been set aside by Congress for their nationally significant cultural, ecological, and scientific values, as part of the National Landscape Conservation System. These areas showcase BLM's conservation side of its multiple use mandate, as Congress identifies in the legislation that designates each NCA its special values and directs BLM "to conserve, protect, and enhance" those values.

The newly-designated Beaver Dam Wash and Red Cliffs NCAs, the first NCAs in Utah, provide critical habitat for rare plant and animal species, including the dwarf bear-claw poppy and Shivwits milk-vetch, native plants that grow only in southwestern Utah, and the threatened Mojave Desert tortoise. The public lands of the NCAs also preserve important heritage resources and provide opportunities for outdoor recreation.

To learn more about the Resource Management Planning Process, visit our new website at: [www.blm.gov/ut/st/en/fo/st\\_george.html](http://www.blm.gov/ut/st/en/fo/st_george.html)



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St. George Field Offices



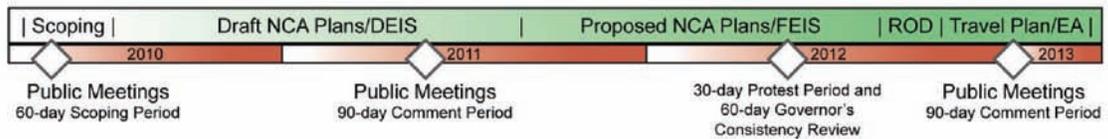
### Amendment of the St. George Field Office 1999 Resource Management Plan

The Act also directed the St. George Field Office to identify areas in Washington County where “biological conservation is a priority” and to “undertake activities to conserve and restore plant and animal species and natural communities within such areas.” To fulfill this mandate, the St. George Field Office Resource Management Plan, approved in 1999, must be amended to designate additional Areas of Critical Environmental Concern (ACECs) for the conservation of biological resources and natural communities. The public is invited to provide information about at risk species and areas where conservation could be a priority and to nominate these areas for consideration as ACECs.

The RMP Amendment will also evaluate the area designations for motorized off-highway vehicle (OHV) travel and make needed revisions. In 1999, public lands in Washington County were designated as “open” (OHV cross-country travel authorized); “limited” (OHV travel limited to designated routes, types of vehicles, seasons of use, etc.); or “closed” (OHV travel prohibited). Public input is needed to identify the diverse OHV uses that are currently taking place on public lands, the presence of sensitive resources and public lands values, and potential conflicts with other uses.

The RMP planning efforts will involve local, county, State, and Tribal governments and members of the public. An Environmental Impact Statement will be prepared to analyze the impacts to the human environment related to the new RMPs for Beaver Dam Wash and Red Cliffs NCAs and the Amendment to the St. George Field Office RMP. To learn more, visit the new St. George Field Office website at: [www.blm.gov/ut/st/en/fo/st\\_george.html](http://www.blm.gov/ut/st/en/fo/st_george.html).

### Opportunities for Public Input





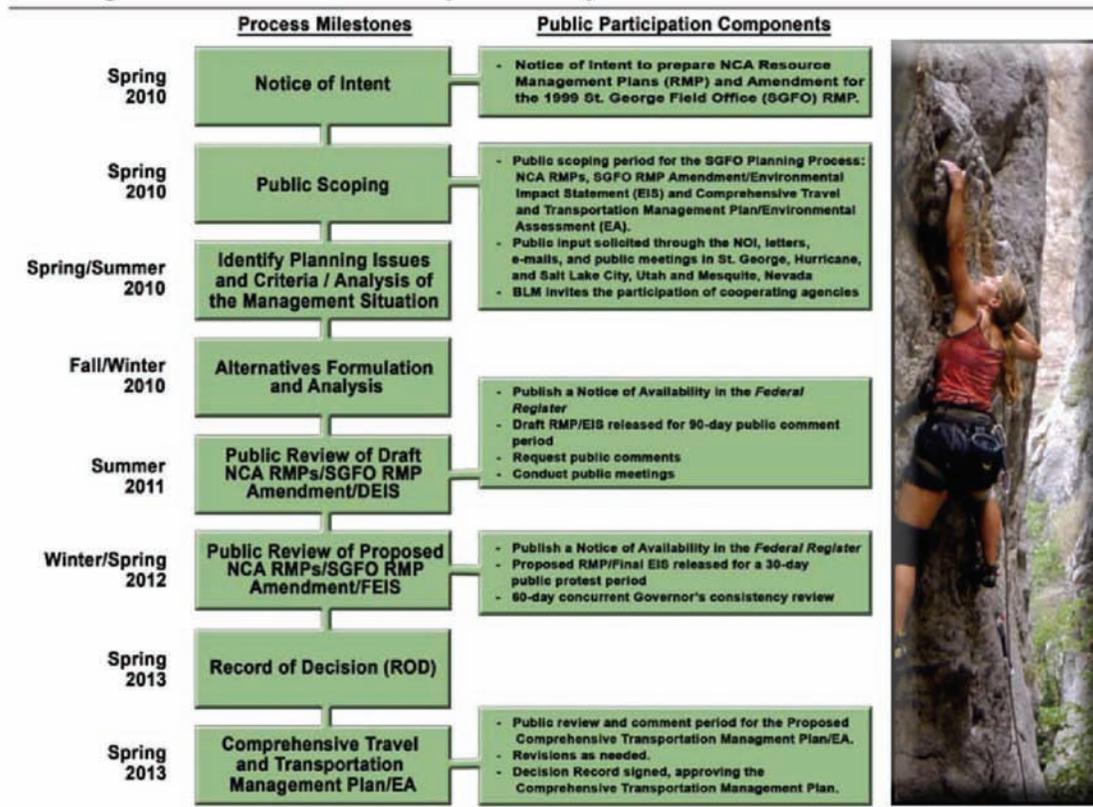
## Comprehensive Travel and Transportation Plan/Environmental Assessment

The Act also directed the St. George Field Office to complete a Comprehensive Travel and Transportation Management Plan, to include specific route designations, the designation of a High Desert Trail System for motorized recreational use, and the identification of a Northern Transportation Route. Comprehensive travel management planning addresses access needs for an array of public land uses; these are evaluated within BLM’s legal mandates to protect sensitive natural and cultural resources and minimize impacts on public land values. This planning process will result in every BLM-managed route in Washington County being designated as open for use, closed to use, or having use limited in some manner.

This planning process will be conducted on a parallel track with the development of the RMPs for the two NCAs and the Amendment to the St. George RMP. An Environmental Assessment will be completed, to analyze the impacts associated with implementation of the Comprehensive Travel and Transportation Management Plan. Public input is essential to the development of a comprehensive plan and the public is invited to:

- Provide route inventory data (e.g., maps, digital files, GPS data)
- Identify routes important for facilities access, recreation, commercial activities, etc.
- Identify areas where existing routes create impacts to sensitive natural and heritage resources,
- Identify routes that could be included in the High Desert Trail System
- Identify alternatives for the Northern Transportation Route

### Planning Process and Public Participation Components



St. George Field Office Planning Process

PENALTY FOR PRIVATE USE, \$300

OFFICIAL BUSINESS

BUREAU OF LAND MANAGEMENT  
 St. George Field Office  
 345 East Riverside Drive  
 St. George, Utah 84790

FIRST CLASS MAIL  
 UNITED STATES POSTAGE  
 AND FEES PAID  
 U.S. Department of the Interior  
 Permit No. G-76

**Public Scoping Process . . . Be a part of the process!**

The public scoping period started on May 10, 2010 when the Notice of Intent was published in the Federal Register. Scoping comments will be accepted through July 19, 2010. There are many ways to provide comments during the scoping period. The BLM encourages you to come to one of the scoping meetings to ask questions and provide input.

Open house meetings will be held June 14-17 at the locations in the table below. They will begin at 6 p.m. and last until 8 p.m. Representatives from BLM’s St. George Field Office will be available at the meetings to answer questions. The open houses will have several information stations to present information on key issues and on the planning process.

In addition to the scoping meetings, the BLM will receive comments through the following methods:

**Mailed or Delivered to:**

Attention: Planning Project Manager  
 c/o Bureau of Land Management  
 St. George Field Office  
 345 East Riverside Drive  
 St. George, UT 84790

**Emailed to:** [utsgmp@blm.gov](mailto:utsgmp@blm.gov)

<u>Date</u>	<u>Location</u>	<u>Address</u>
Monday June 14	St. George, Utah	Dixie Center 1835 Convention Center Dr., St. George, UT
Tuesday June 15	Mesquite, Nevada	Mesquite Community and Senior Center 102 West Old Mill Road, Mesquite, NV
Wednesday June 16	Hurricane, Utah	City of Hurricane Office 147 North 870 West, Hurricane, UT
Thursday June 17	Salt Lake City, Utah	SLC Public Library, Conf. Room - Level 4 210 East 400 South, Salt Lake City, UT

Please include “Planning Process for St. George Field Office” in your correspondence. Following the close of the scoping period, a scoping report will be available at the BLM’s St. George Field Office website. The report will summarize public comments collected during the scoping period.

# APPENDIX E—SCOPING MEETING DISPLAY BOARDS



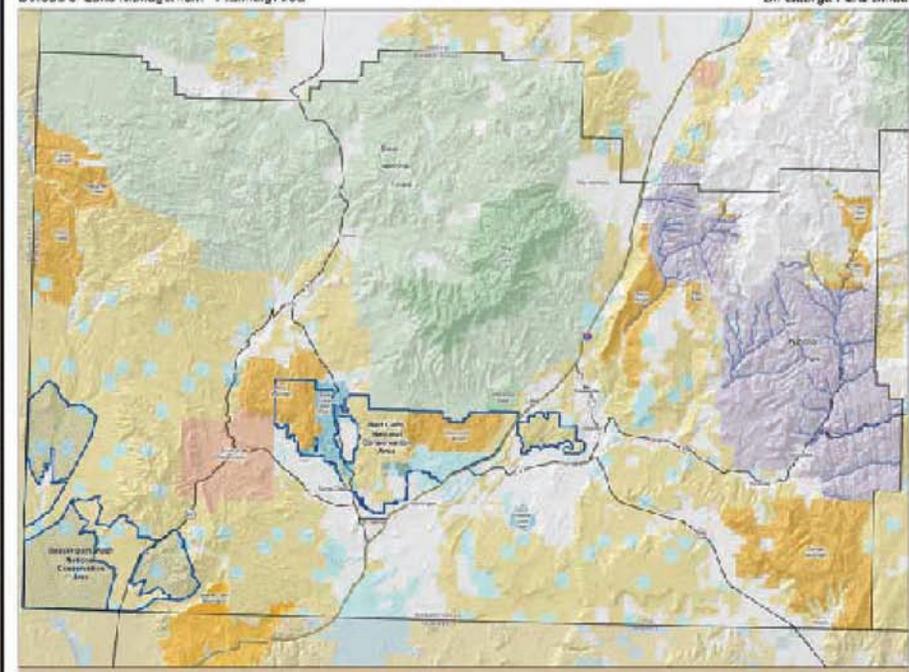
**St. George Field Office Planning Process**

## Summary of the Omnibus Public Land Management Act of 2009

On March 30, 2009, the Omnibus Public Land Management Act of 2009 was signed into law. Section O of this legislation addressed public lands in Washington County managed by BLM's St. George Field Office, through the following:

- Designation of the Beaver Dam Wash National Conservation Area (63,500 acres);
- Designation of the Red Cliffs National Conservation Area (45,000 acres);
- Designation of 14 new Wilderness areas (129,300 acres);
- Designation of 19 miles of Wild and Scenic Rivers;
- Conveyance of 640 acres to the Shivwits Band of the Paiute Indian Tribe of Utah;
- Conveyance of 353 acres to local municipalities for community recreation and public purposes.

Bureau of Land Management - Planning Area St. George Field Office



Bureau of Land Management (BLM)	Wild Forest Reserve (WFR)	State of Utah	Wildland/Conservation Area
Existing BLM Wilderness	County (COP) Wilderness	State Park	NCA Designated Flood Plain
Indian Reservation	National Park System (NPS)	Private Land	PWA and Basin River

This map was prepared by the St. George Field Office and is intended for informational purposes only. It does not constitute a legal document. For more information, contact the St. George Field Office at 435-771-3400.

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**St. George Field Office Planning Process**

**BLM**

## Planning Requirements from the Omnibus Public Land Management Act of 2009

The St. George Field Office is initiating two concurrent public planning processes, to comply with Congressional direction from the Omnibus Public Land Management Act of 2009.

### Land Use Planning/Environmental Impact Statement

#### Resource Management Plans for the Beaver Dam Wash and Red Cliffs NCAs

Planning Issues

- Desired future conditions for the special values of these units.
- Management direction to “conserve, protect, and enhance” the resources of the NCA.

#### Plan Amendment for St. George Field Office 1999 Resource Management Plan

Planning Issues

- Designation of new Areas of Critical Environmental Concern (ACECs) to “identify areas located in the county where biological conservation is a priority” and to “undertake activities to conserve and restore plant and animal species and natural communities within such areas.”
- Modifications to area designations (open, limited, or closed) for motorized vehicle travel.
- Identify one or more alternatives for a northern transportation route in Washington County.




### Implementation Planning/Environmental Assessment

#### Comprehensive Travel and Transportation Management Plan

Planning Issues

- Route designations for public land access.
- Designation of a trail or system of trails to be known as the High Desert Off-Highway Vehicle Trail.



**St. George Field Office**





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### Scope of Planning Issues

Through passage of the Omnibus Public Land Management Act of 2009, Congress provided direction for several issues that are normally addressed through the RMP planning process. The Act closed the Red Cliffs and Beaver Dam Wash NCAs to mineral development, subject to valid existing rights. The Act also made route designations in portions of the Beaver Dam Wash NCA. As a result of this Congressional direction, the RMP for the Red Cliffs and Beaver Dam Wash NCAs will not consider management actions or alternatives related to these issues. Other issues could be considered for the NCA RMP, subject to the priorities and directions provided in the Act.

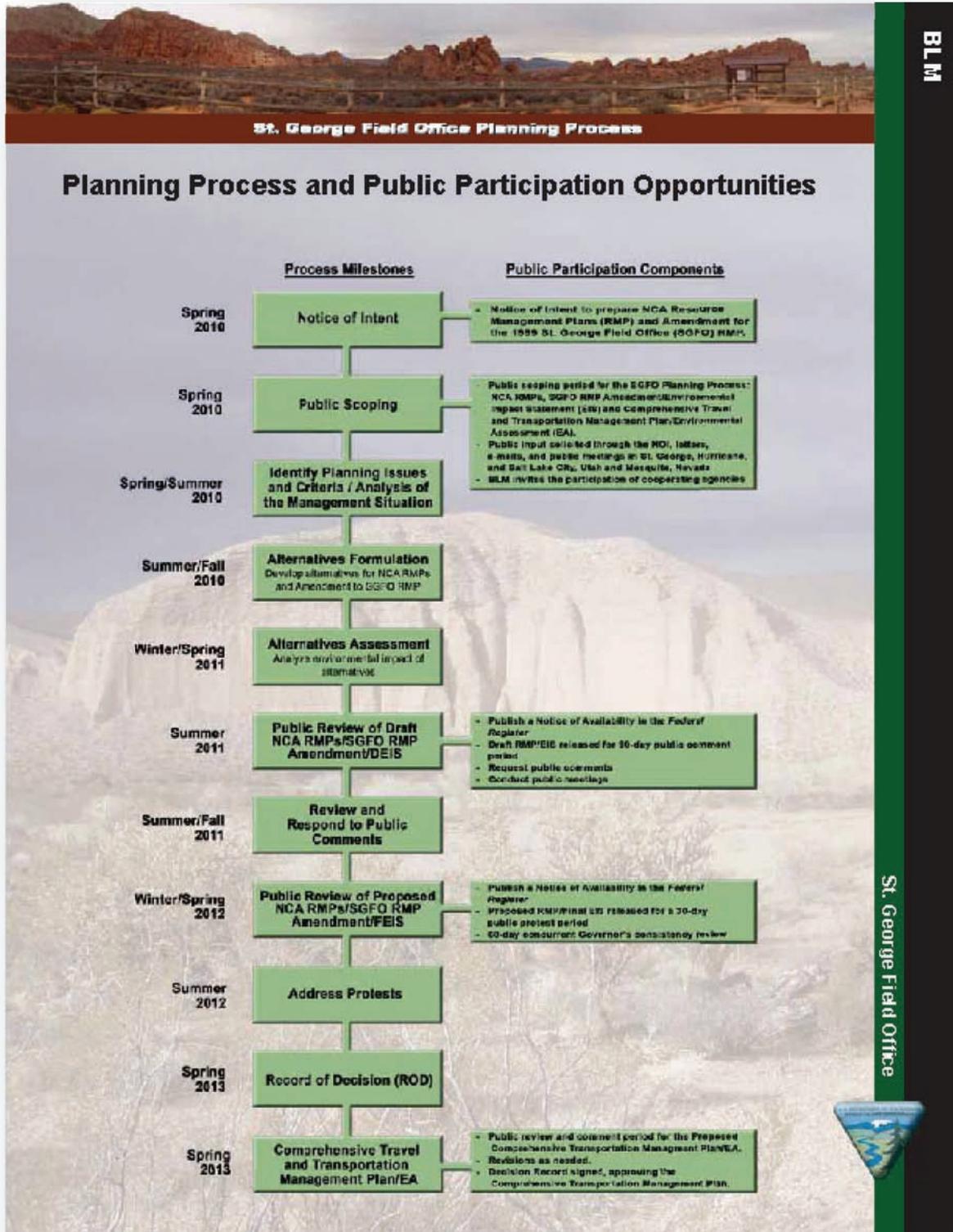
Outside the NCAs, in the remainder of the St. George Field Office, this planning effort will be limited to the specific Congressional requirements from the Act. This planning process will consider OHV area and route designations, identification and management of priority biological areas, and identification of a northern transportation route. Other issues beyond these will not be addressed in this planning process outside the NCAs.

The Act also designated Wilderness and Wild and Scenic Rivers. A separate implementation-level planning effort will be conducted under a separate NEPA analysis to address the management of these designations.



St. George Field Office





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St. George Field Office RMP Amendment Process

## Off-Highway Vehicle Area Designations

All public lands are required to have one of the following off-highway vehicle (OHV) area designations:

- **Open:** Area is open to cross-country travel.
- **Limited:** Area is limited to designated roads and/or trails.
- **Closed:** Area is closed to motorized vehicles.

OHV area designations must be consistent with the management and protection objectives for sensitive public land resources, such as cultural resources, endangered species, community watersheds, and healthy lands.

OHV area designations that were made through the St. George Field Office Resource Management Plan, approved in 1999, will be reviewed and modified if needed, through an RMP Amendment process, which will be supported by an Environmental Impact Statement (EIS).

Individual route evaluations and designations will not be part of the RMP Amendment process and will not be included in the analysis in the EIS because these are not land use plan decisions, they are implementation-level decisions.

Individual route evaluations and designations will be addressed in the Comprehensive Travel and Transportation Management Plan in an Environmental Assessment (EA). The Comprehensive Travel and Transportation Management Plan/EA will be completed through a planning process that is being conducted on a parallel track with the RMP Amendment process.

Plan of Land and Management - Existing Off-Highway Vehicle Designations St. George Field Office

■ Open to Cross-Country Travel     ■ Open to Designated Roads and/or Trails  
■ Closed to Motorized Vehicles     ■ Designated Roads and/or Trails

This information was used to develop the RMP Amendment for the St. George Field Office. It is not intended to be used for any other purpose. The BLM is not responsible for any errors or omissions in this information.

St. George Field Office

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Red Cliffs NCA Plan

## Red Cliffs National Conservation Area Resource Management Plan

### Red Cliffs National Conservation Area

Through the Omnibus Public Land Management Act of 2009, Congress designated the 45,000 acre Red Cliffs NCA in Washington County, Utah “to conserve, protect, and enhance... the ecological, scenic, wildlife, recreational, cultural, historical, natural, educational, and scientific resources of the National Conservation Area and to protect each species that is located in the National Conservation Area and listed as a threatened or endangered species...”

### Resource Values and Special Features

The Red Cliffs NCA is located where the Colorado Plateau, Great Basin and Mojave Desert overlap in Washington County. In this transition zone, unusual plant and animal species have evolved, including the dwarf bear-claw poppy and Shivwits milkvetch, small native plants that grow nowhere else. The hot, arid Mojave Desert provides habitat for diverse wildlife species, such as the kit fox, Gila monster, and the Mojave Desert tortoise, listed as threatened species under the Endangered Species Act. Dinosaur tracks, Ancestral Puebloan rock art sites, and mid-19<sup>th</sup> century Mormon farmsteads are preserved on public lands in the Red Cliffs NCA. Hikers, mountain bikers, and trail riders enjoy miles of designated trails in the NCA, just a few miles drive from local communities. The newly-designated Cottonwood Wilderness is within the boundaries of the NCA, while the Red Mountain Wilderness forms the western boundary of the NCA. Opportunities for solitude, natural quiet, and wilderness experiences abound for hikers, backpackers, and equestrians in these wilderness areas, where motorized and mechanized vehicles are not authorized.

Red Cliffs National Conservation Area      St. George Field Office

St. George Field Office



**Red Cliffs NCA Plan**

## Red Cliffs NCA Planning Issues and Public Input

Public input is needed to assist the St. George Field Office to identify alternatives for long-term management that are consistent with the legislative mandates for resource conservation and protection of the NCA values from the Omnibus Public Land Management Act of 2009. Issues to be considered in the RMP will include:

- Resource protection and desired future conditions,
- Species conservation,
- Habitat restoration,
- Resource inventory needs and opportunities,
- Scientific research needs and opportunities,
- Sustainable recreation opportunities,
- Interpretation and public education,
- Visual Resource Management.



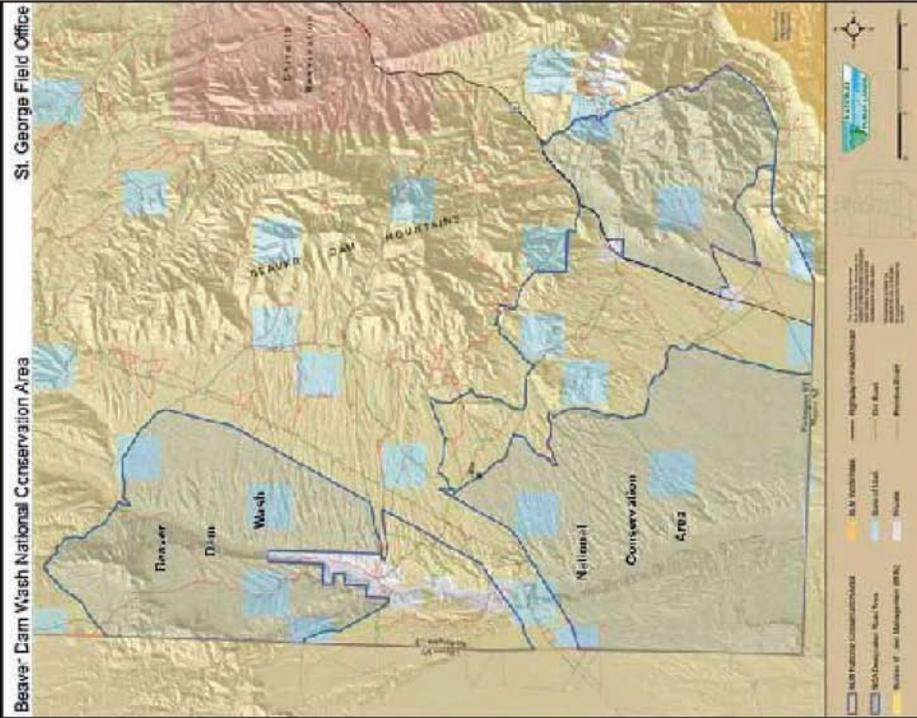
St. George Field Office



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St. George Field Office

Beaver Dam Wash NCA Plan



## Beaver Dam Wash National Conservation Area Resource Management Plan

Through the Omnibus Public Land Management Act of 2009, Congress designated the 63,500 acre Beaver Dam Wash NCA in Washington County, Utah “to conserve, protect, and enhance... the ecological, scenic, wildlife, recreational, cultural, historical, natural, educational, and scientific resources” of these public lands. Three areas of the NCA were identified by Congress as “designated road areas,” where all public motorized vehicle travel, including off-highway vehicles, is restricted to the specific roads shown on the map.

### Unique Values and Special Features

This NCA is within an ecological transition zone between the Mojave Desert and the Great Basin. Creosote bush, white bursage, and other desert shrubs grow at lower elevations and provide habitat for desert bighorn sheep and the Mojave Desert tortoise, a threatened species listed under the Endangered Species Act. Joshua trees and dense stands of blackbrush cover the slopes of the Beaver Dam Mountains, along the eastern boundary of the NCA. Surface water flows in the upper reaches of Beaver Dam Wash, but rarely travels all the way through the NCA. Riparian vegetation along the stream channel is important habitat for migratory birds and other wildlife.



BLM

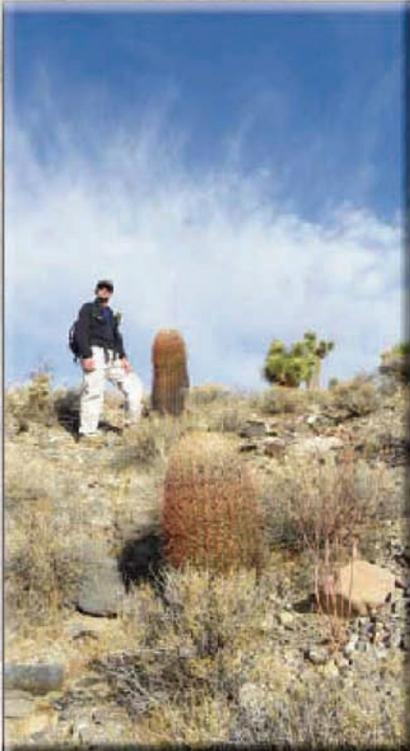
Beaver Dam Wash NCA Plan

## Beaver Dam Wash NCA Planning Issues and Public Input

Public input is needed to assist the St. George Field Office to identify alternatives for long-term management that are consistent with the legislative mandates for resource conservation and protection of the NCA values from the Omnibus Public Land Management Act of 2009. Issues to be considered in the RMP will include:

- Resource protection and desired future conditions,
- Species conservation,
- Habitat restoration,
- Resource inventory needs and opportunities,
- Scientific research needs and opportunities,
- Sustainable recreation opportunities,
- Interpretation and public education,
- Visual Resource Management,
- Management and interpretation of the Old Spanish Trail National Historic Trail.







St. George Field Office




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St. George Field Office RMP Amendment Process

## St. George Field Office RMP Amendment

### Priority Biological and Natural Community Conservation Areas

The Omnibus Public Land Management Act of 2009 directs the BLM to “identify areas located in the county where biological conservation is a priority” and to “undertake activities to conserve and restore plant and animal species and natural communities within such areas.” Through this planning process, the 1999 St. George Resource Management Plan (RMP) will be amended to satisfy this direction through the consideration of nominated Areas of Critical Environmental Concern (ACECs) that meet relevance and importance criteria for “priority biological and natural community conservation areas.”

ACECs are areas of BLM-managed public land where special management attention is required to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources or other natural systems or processes, or to protect life and safety from natural hazards (43 USC 1702a).

### Nominating ACECs where Biological Species and Natural Communities Conservation is a Priority

The public is invited to provide data and information on plant and animal species and natural communities on public lands managed by the St. George Field Office where conservation and restoration could be a priority. The public is also invited to nominate new areas for consideration as potential ACECs where biological species and natural community conservation could be a priority. Nominations should be accompanied by the following:

- Descriptive materials, information, and data for the nominated area and its resources;
- Maps;
- Evidence of the relevant and important biological resources (see 43 CFR 1610.7-2 or BLM Manual 1613).

The public will have an opportunity to comment on BLM’s assessment of the relevance and importance criteria evidence provided in support of new ACEC nominations and proposed ACEC management when the Draft Plan Amendment to the SGFO RMP/Draft Environmental Impact Statement (EIS) is released for public review and comment.









**St. George Field Office Travel Management Planning Process**

BLM

## Travel Management

### What else was in the Omnibus Public Land Management Act of 2009 that effects Travel Management Planning in Washington County?

#### High Desert Off-Highway Vehicle Trail

The Omnibus Public Land Management Act of 2009 directs the St. George Field Office (SGFO) to designate a trail or system of trails to be known as the High Desert Off-Highway Vehicle Trail. Any trails designated by the SGFO will need to match up with one or more of the proposed routes on the Dixie National Forest, and routes open for motorized vehicle travel in Lincoln County, Nevada and/or Mojave County, Arizona, where the trail leaves Washington County.

#### Northern Transportation Corridor

The SGFO is mandated by the Act to “identify one or more alternatives for a northern transportation route in the County,” as part of the Washington County Comprehensive Travel and Transportation Management Plan.

#### Beaver Dam Wash NCA Designated Road Areas

Congress, through the Act, identified three areas within the Beaver Dam Wash NCA as “designated road areas” and showed the roads on the legislative map in these areas that are open to the public. All other roads are now closed to public motorized use, although some roads in these areas may remain open for specific administrative uses. The Travel Management Planning process cannot change these Congressionally-mandated designations.

#### How can the public participate in Travel Management Planning?

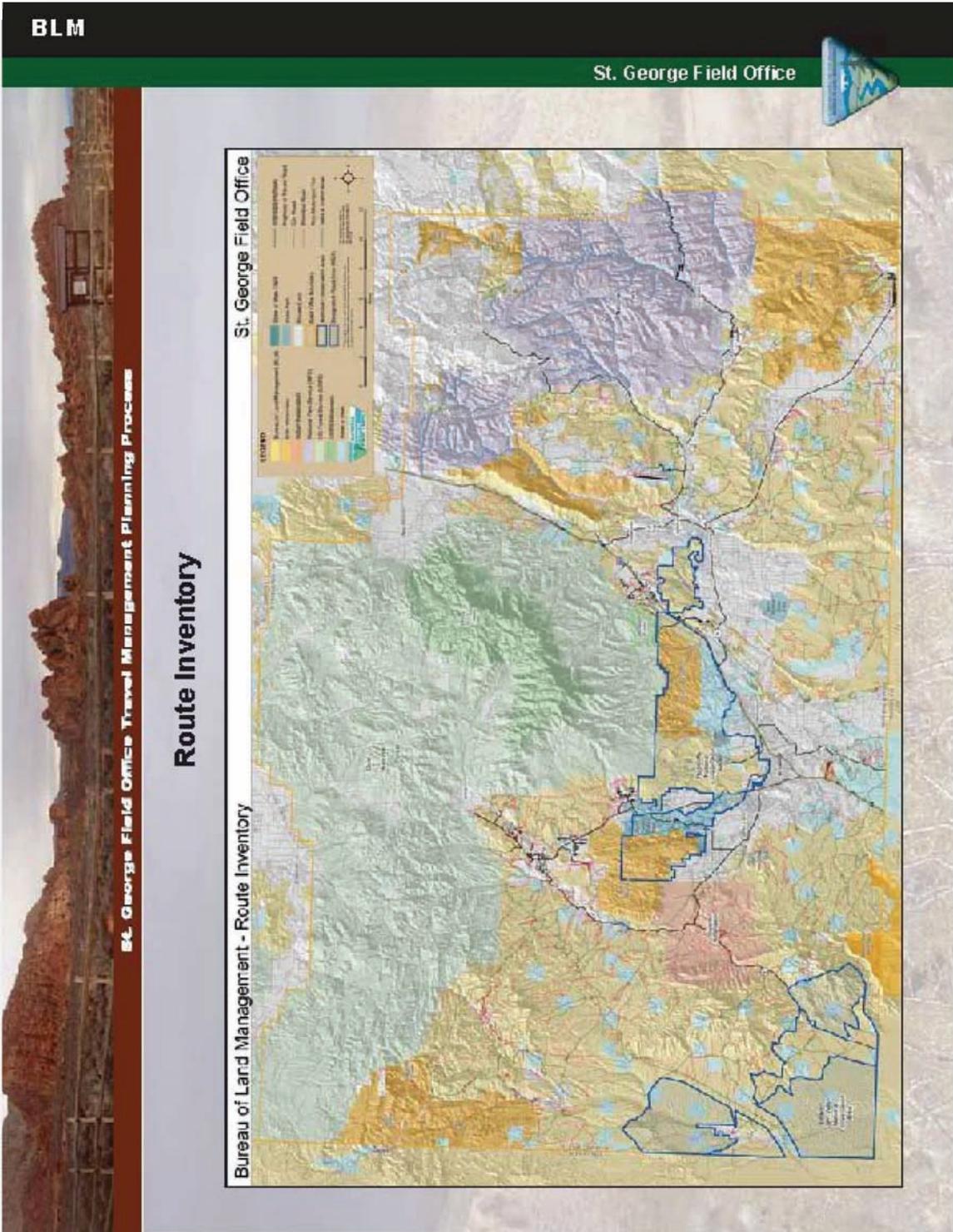
Public participation in the Travel Management Planning process is critical in ensuring a viable route network that meets the needs of public lands users and protects the health of public lands.

Input is being solicited from local, county, state, and federal government agencies, Tribal governments, utility companies, livestock operators, recreation groups, other interest groups, and the general public to ensure that all relevant information is used in the development of the SGFO Comprehensive Travel and Transportation Management Plan/EA.




St. George Field Office





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# PUBLIC COMMENT FORM

## PUBLIC COMMENT FORM St. George Planning Process



Scoping comments will be accepted through July 19, 2010. Comments can be e-mailed to the BLM ([utsgrmp@blm.gov](mailto:utsgrmp@blm.gov)) or mailed to:

Attention: Planning Project Manager  
c/o Bureau of Land Management  
St. George Field Office  
345 East Riverside Drive  
St. George, UT 84790

To learn more about the resource management plan process, visit [www.blm.gov/ut/st/en/fo/st\\_george.html](http://www.blm.gov/ut/st/en/fo/st_george.html). Comments, including names and street addresses of respondents will be available for public review after the comment period at the St. George Field Office during regular business hours (7:30 a.m. to 4:30 p.m.) Monday through Friday, except holidays. Individual respondents may request confidentiality. **If you wish to withhold your name or address from public review or from disclosure under the Freedom of Information Act, you must check the box below.** Such requests will be honored to the extent allowed by law. All submissions from organizations or businesses will be made available for public inspection in their entirety.

Please withhold my personal information from public review or disclosure under the Freedom of Information Act.

Name / Organization: \_\_\_\_\_

Address: \_\_\_\_\_

Phone Number / Email Address: \_\_\_\_\_

Comments (attach additional sheets, as needed):

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## ACEC NOMINATION HANDOUT

### Conservation and Restoration of Priority Biological Areas through the Designation of Areas of Critical Environmental Concern (ACECs)

The Omnibus Public Land Management Act of 2009 (the Act) directs the BLM to “identify areas...where biological conservation is a priority” and to “undertake activities to conserve and restore plant and animal species and natural communities within such areas.” The amendment of the St. George Resource Management Plan will address this direction through the consideration of nominated ACECs that meet relevance and importance criteria associated with the Act’s description of “priority biological areas.”

**What is an ACEC?** ACECs are “areas within the public lands where special management attention is required (when such areas are developed or used or where no development is required) to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources or other natural systems or processes, or to protect life and safety from natural hazards” (FLPMA, Title I, Sec 103(a)). In addition, to be designated as an ACEC, an area “must require special management attention to protect the important and relevant values” (BLM-M-1613, .12). Each ACEC’s management is designed to address the values associated with that ACEC, and therefore could vary from area to area.

**Relevance and Importance Criteria:** ACEC nominations are all analyzed to ensure that the resources, processes, and systems in the nominated area meet one or more of the criteria for both relevance and importance. The criteria applicable to priority biological areas include (from BLM-M-1613, .1):

*Relevance:* An area meets the “relevance” criterion if it contains one or more of the following:

- A fish and wildlife resource (including but not limited to habitat for endangered, sensitive, or threatened species, or habitat essential for maintaining species diversity).
- A natural process or system (including but not limited to endangered, sensitive, or threatened plant species; rare, endemic, or relic plants or plant communities which are terrestrial, aquatic, or riparian; or rare geological features).

*Importance:* The resource, system, or process described above must have substantial significance and value in order to satisfy the importance criteria. This generally means that the resource, system, or process is characterized by one or more of the following:

- Has more than locally significant qualities which give it special worth, consequence, meaning, distinctiveness, or cause for concern, especially compared to any similar resource.
- Has qualities or circumstances that make it fragile, sensitive, rare, irreplaceable, exemplary, unique, endangered, threatened, or vulnerable to adverse change.
- Has been recognized as warranting protection in order to satisfy national priority concerns or to carry out the mandates of Federal Land Policy and Management Act (FLPMA).
- Has qualities which warrant highlighting in order to satisfy public or management concerns about safety and public welfare.
- Poses a significant threat to human life and safety or to property.

**Nominating ACECs where Biological Conservation is a Priority:** The public is invited to provide information on plant and animal species and natural communities in areas where biological conservation could be a priority. The public is also invited to nominate areas for consideration as ACECs where biological conservation could be a priority. Nominations should be accompanied by the following:

- Contact information for the nominator,
- Descriptive materials, including information and data for the nominated area and its resources and explanations on why conservation of the biological resources should be a priority,
- Maps, including boundaries of the nominated area(s) and any supporting resource maps, and
- Evidence of the relevance and importance of the biological resources (BLM-M-1613, .41).

The public will have an opportunity to comment on the BLM’s assessment of relevant and important values and the associated alternatives for ACEC proposed management and supporting analyses when the Draft Environmental Impact Statement (EIS) is provided for public review and comment.

BLM

St. George Field Office



Nomination packages must be submitted to St. George Field Office (see below) by **July 19, 2010**.  
Nominations can be submitted on this form or in a separate packet that contains similar information.

**Mailed or Delivered to:**  
Attention: Planning Project Manager  
c/o Bureau of Land Management  
St. George Field Office  
345 East Riverside Drive  
St. George, UT 84790

**Emailed to:** utsgmp@blm.gov

Please include "Resource Management Plan Amendment for the St. George Field Office, Utah, and associated Environmental Impact Statement" in your correspondence.

**Name:** \_\_\_\_\_

**Address:** \_\_\_\_\_

**City:** \_\_\_\_\_ **State:** \_\_\_\_\_ **ZIP Code:** \_\_\_\_\_

**Nominated ACEC Area Name:** \_\_\_\_\_

**Description of the Area** (information for the nominated area and its resources and explanations on why conservation of the biological resources should be a priority): \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
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\_\_\_\_\_

(Attach pages as necessary)

**Evidence of the Relevant and Important Biological Resources** (we recommend that you fully develop these factors as they are the most important part of the nomination—provide as much detail and data to support your nomination as possible): \_\_\_\_\_

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(Attach pages as necessary)

**Maps:** Attach a map(s) of the area's boundaries and any other supporting resource maps.

## PUBLIC MEETING HANDOUTS

# BEAVER DAM WASH NATIONAL CONSERVATION AREA

## What is a National Conservation Area?

Through the Omnibus Public Land Management Act of 2009, Congress designated the Beaver Dam Wash National Conservation Area (NCA) in Washington County, Utah "to conserve, protect, and enhance... the ecological, scenic, wildlife, recreational, cultural, historical, natural, educational, and scientific resources" of these public lands. The new NCA comprising roughly of 63,500 acres is managed by the BLM's St. George Field Office.



## Where is the Beaver Dam Wash NCA?

Located in the southwest corner of Washington County, Utah, the Beaver Dam Wash NCA is approximately 22 miles west of St. George, Utah and roughly 13 miles northwest of Littlefield, Arizona. The Nevada and Arizona state lines, border the western section of the NCA and Interstate 15 and the Virgin River parallel its southern boundary. U.S. Highway 91 is the only paved highway through the NCA.

## What Are the Special Values of the Beaver Dam Wash NCA?

This NCA is within an ecological transition zone between the Mojave Desert and the Great Basin. Creosote bush, white bursage, and other desert shrubs grow at lower elevations and provide habitat for desert bighorn sheep and the Mojave Desert tortoise, a threatened species listed under the Endangered Species Act. Joshua trees and dense stands of blackbrush cover the slopes of the Beaver Dam Mountains, which rise along the eastern boundary of the NCA. Surface water flows in the upper reaches of Beaver Dam Wash, but rarely travels all the way through the NCA. Riparian vegetation along the stream channel is important habitat for migratory birds and other wildlife.

## Are there developed Recreation Sites or Trails in the Beaver Dam Wash NCA?

At this time, there are no developed recreation facilities in the NCA. The St. George Field Office is preparing a Management Plan that will address recreation uses and the types of facilities needed to provide for quality visitor experiences, while protecting the special values of the NCA.

## Are there Special Restrictions in the Beaver Dam Wash NCA?

Congress restricted all motorized vehicle travel, including off-highway vehicles, in the NCA to designated roads and, in certain areas, only to the specific roads shown on the map on the back of this page.

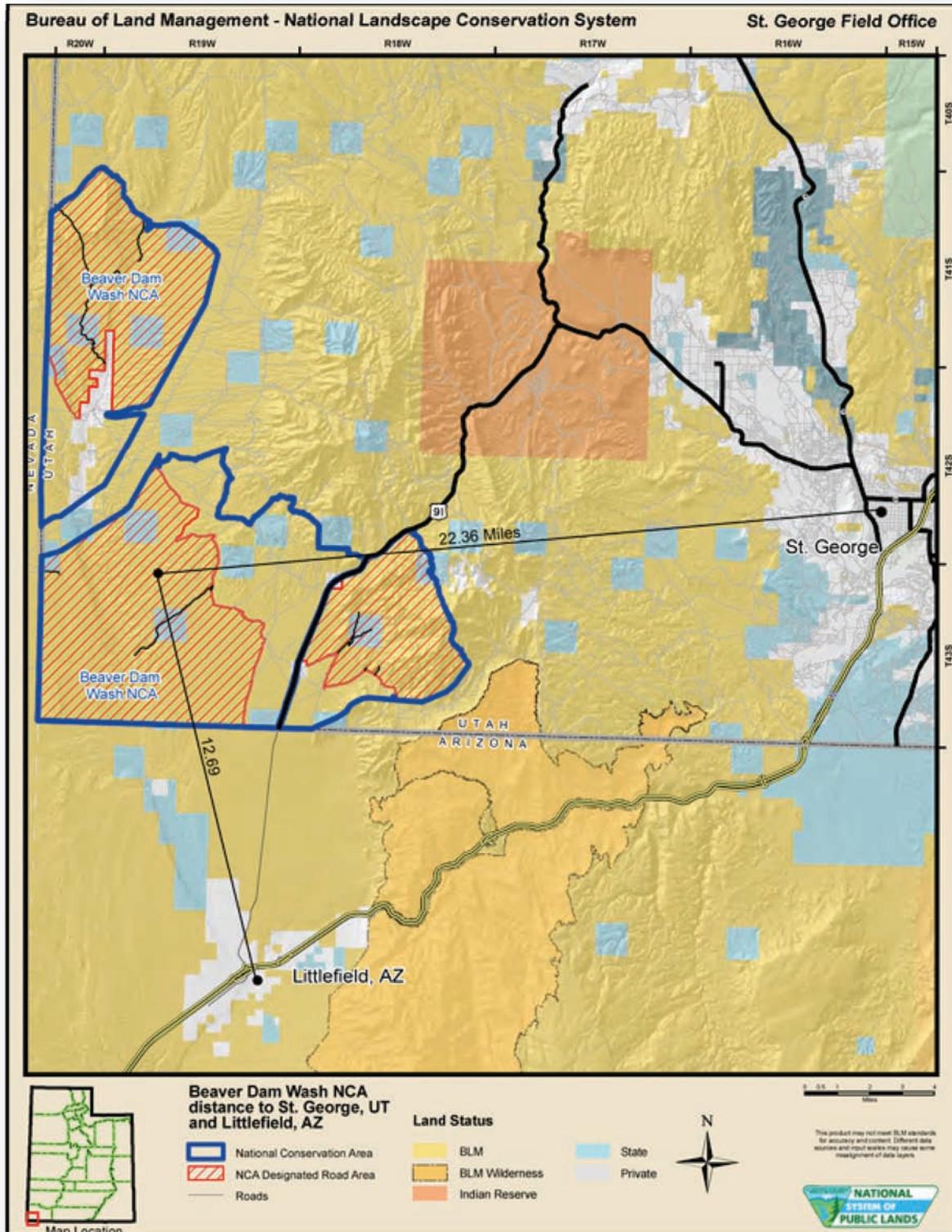
## More Information

Additional information about the new NCA can be found on the St. George Field Office website at: [http://www.blm.gov/ut/st/en/fo/st\\_\\_george.html](http://www.blm.gov/ut/st/en/fo/st__george.html)

BLM

St. George Field Office





# RED CLIFFS NATIONAL CONSERVATION AREA



Through the Omnibus Public Land Management Act of 2009, Congress designated the Red Cliffs National Conservation Area (NCA) in Washington County, Utah, "to conserve, protect, and enhance...the ecological, scenic, wildlife, recreational, cultural, historical, natural, educational, and scientific resources" of public lands in the NCA. The new NCA is managed by the BLM St. George Field Office.

## Where is the Red Cliffs NCA?

The NCA is located in south-western Washington County and includes 45,000 acres of public land. The towering Pine Valley Mountains and Dixie National Forest lie to the north, while the communities of Ivins, Santa Clara, St. George, Washington, and Leeds surround the NCA. The NCA boundary follows the Red Cliffs Desert Reserve, a multi-jurisdictional land base that has been collaboratively managed by the BLM, the state of Utah, Washington County, and local municipalities since 1996 to protect the threatened Mojave Desert tortoise and other at-risk native species.

## What are the special values of the Red Cliffs NCA?

The Colorado Plateau, Great Basin, and Mojave Desert overlap in Washington County. In this transition zone, unusual plant and animal species have evolved, including the dwarf bear poppy and Shivwits milkvetch, small native plants that grow nowhere else on earth. The hot, arid Mojave Desert provides habitat for diverse wildlife species such as the kit fox, Gambel's quail, and the Mojave Desert tortoise. This native tortoise is listed under the Endangered Species Act and is at risk of extinction due to habitat loss and other factors. The newly-designated Red Mountain and Cottonwood Canyon Wilderness areas are also within the NCA. Here, hikers, backpackers, and horseback riders can enjoy scenic vistas, solitude, and natural quiet, just a few miles drive from local communities.



## Are there developed recreation sites and trails in the Red Cliffs NCA?

More than 130 miles of non-motorized recreation trails for hiking, mountain biking, and equestrian trail riding, are available for public use in the NCA. The Red Cliffs Recreation Area offers camping and day-use areas in developed sites where fees are charged.

## Are there special restrictions in the Red Cliffs NCA?

All motorized vehicle travel, including off-highway vehicles, is limited to designated roads in the NCA. No motorized or mechanized vehicle travel is allowed in the Red Mountain and Cottonwood Canyon Wilderness areas. There are also special restrictions for off-trail travel and the discharge of firearms in certain areas of the NCA. Detailed information can be found at: [www.redcliffsdesertreserve.com](http://www.redcliffsdesertreserve.com).

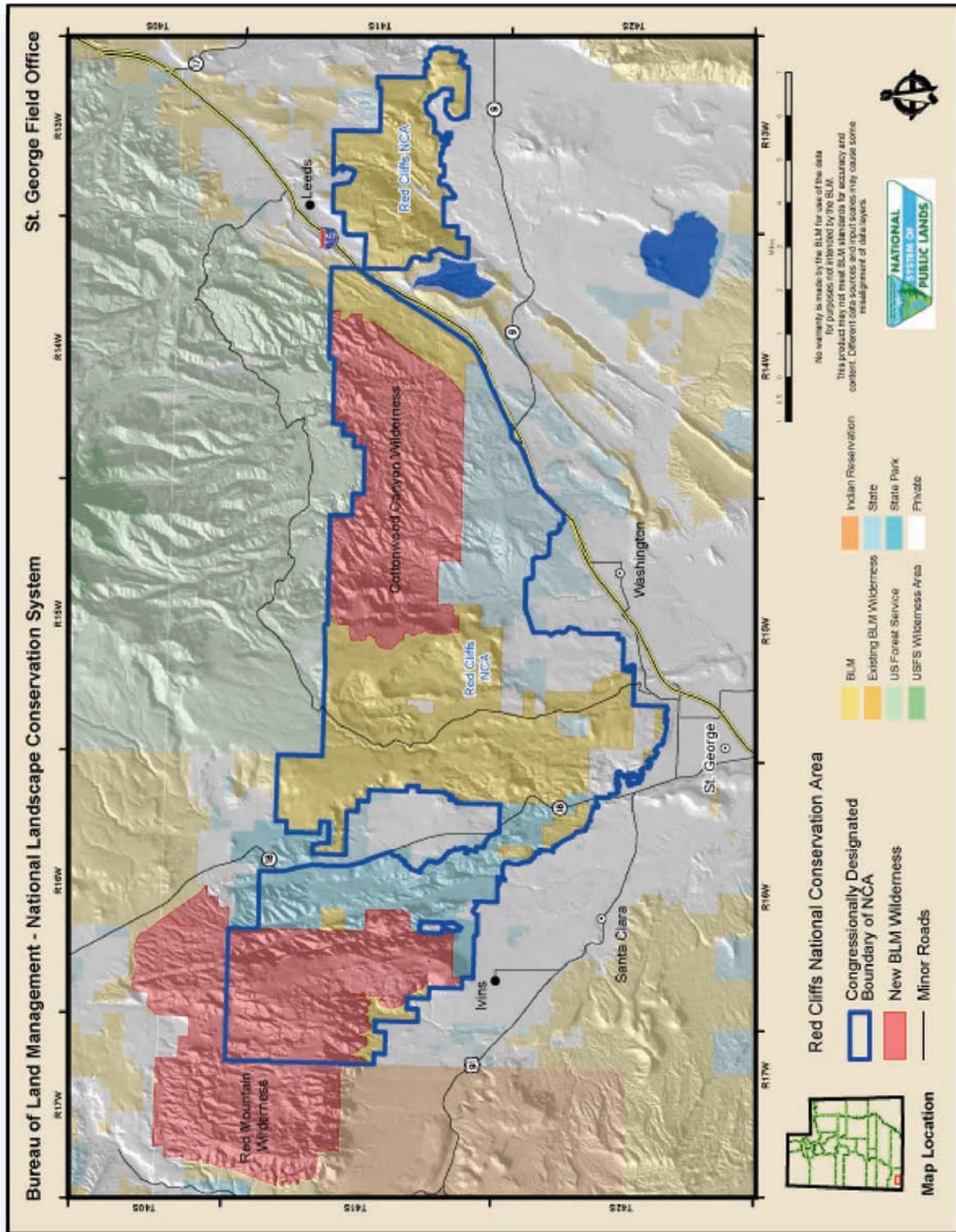
## More Information:

Information about the new Red Cliffs NCA can be found on the St. George Field Office web site at: [http://www.blm.gov/ut/st/en/fo/st\\_george.html](http://www.blm.gov/ut/st/en/fo/st_george.html)

BLM

St. George Field Office





BLM
St. George Field Office

# TRAVEL MANAGEMENT PLANNING

The Omnibus Public Land Management Act of 2009 directs the St. George Field Office to complete a Comprehensive Travel and Transportation Management Plan for all the BLM-managed public lands in Washington County, Utah, within three years.

**What is a Comprehensive Travel and Transportation Management Plan?**

Comprehensive travel management planning addresses access needs for a wide array of public land uses including recreational, agricultural, and commercial activities. Access needs are evaluated within the context of BLM's legal mandates to protect sensitive natural and cultural resources on public lands. Based on this comprehensive evaluation, every route on BLM-managed lands in Washington County will receive one of the following designations as a result of the planning process: open, closed, or limited. Open areas are where cross-country off-highway vehicle travel is permitted. Closed areas are not available for motorized travel. Limited areas are restricted to designated routes and trails only.

**How are Travel Management Plans Developed?**

Travel Management planning is a systematic, multi-step process that includes the following:

- **Information Gathering:** Conduct GPS mapping of existing routes and identify planning issues.
- **Data refinement:** Collect resource data required to successfully evaluate each route.
- **Route Evaluation Preparation:** Divide the planning area into sub-regions and produce planning maps.
- **Public Feedback I:** Solicit public input at workshops to ensure all information has been collected.

Cove Wash, St. George Field Office



# DESIGNATED WILD AND SCENIC RIVERS

In 1968, Congress established a national policy to protect undeveloped rivers and streams, through the Wild and Scenic Rivers Act and the creation of the National Wild and Scenic Rivers System. To be included in this system, a river must be free-flowing and the stream corridor must contain at least one "outstandingly remarkable" resource value, such as scenic and habitat qualities or recreational potential. Eligible rivers are further categorized as either "wild," "scenic," or "recreational" rivers, based on their naturalness and accessibility for recreational uses.



## Are there Wild and Scenic Rivers in Washington County?

Through the Omnibus Public Land Management Act of 2009, Congress designated approximately 165 miles of the Virgin River and its tributaries across federal land within and adjacent to Zion National Park to the National Wild and Scenic Rivers System. Eleven river segments, totaling approximately 19 miles, are managed by the BLM St. George Field Office. Each of the segments flows into, or out of, Zion National Park and a majority are within new wilderness areas that were also designated in the 2009 legislation.



## How does the Wild and Scenic Rivers designation affect the public's use of the rivers?

The Wild and Scenic Rivers Act protects the natural, undeveloped qualities of designated rivers, through restrictions on land uses and activities that could impair or destroy these values. Because all but two of the BLM-managed segments flow through newly-designated wilderness areas, motorized and mechanized vehicle travel and equipment use are prohibited in these river corridors. Primitive recreational activities such as hiking, backpacking, camping, and fishing continue to be authorized public uses of the designated rivers and adjacent BLM-managed public lands.

## What's Ahead?

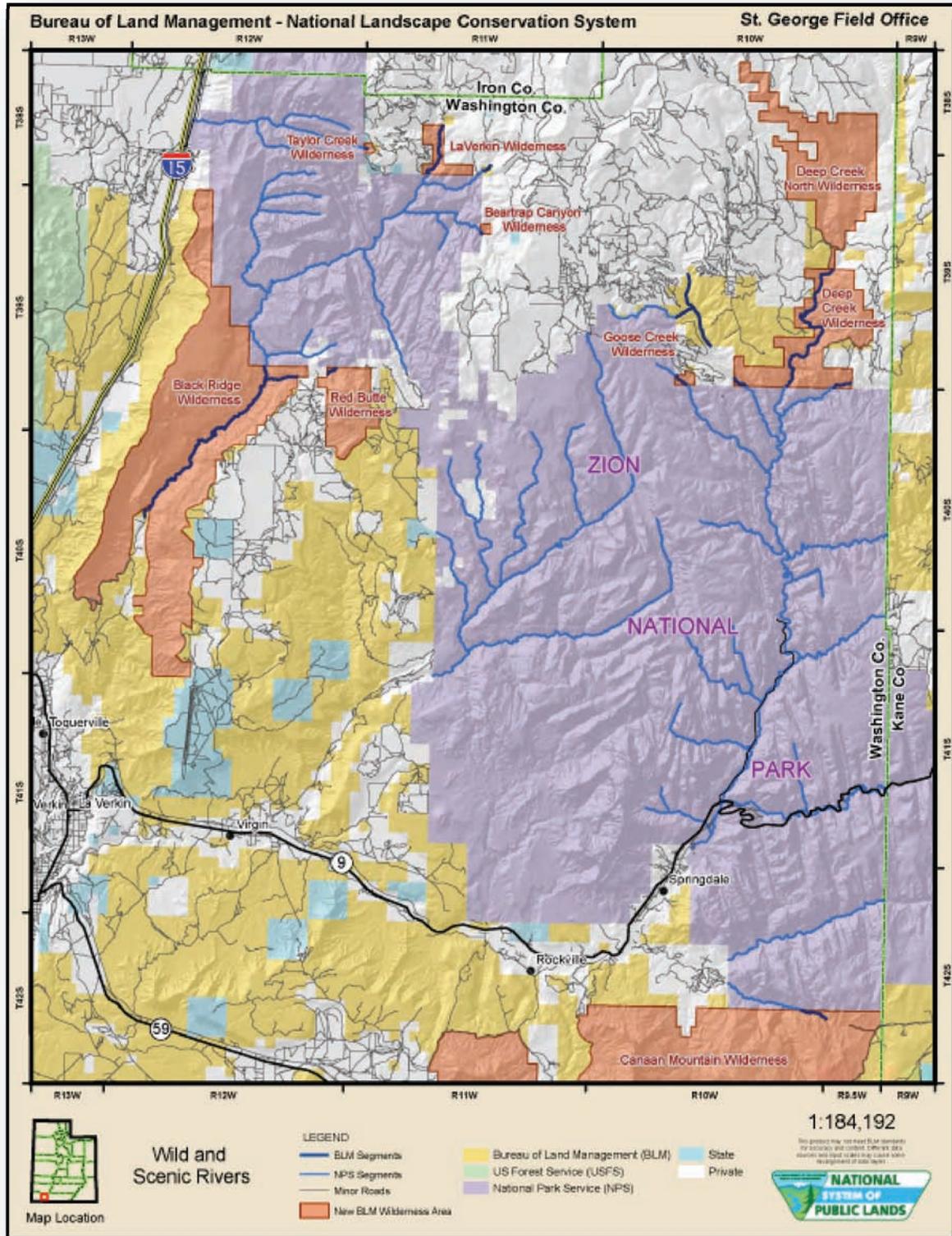
Detailed maps of the newly-designated wild and scenic rivers will soon be available to the public. The BLM will complete management plans for these rivers through a public process in the future.

Additional information about the new and scenic river segments on BLM land in Washington County can be found on the St. George Field Office web site at:  
[http://www.blm.gov/ut/st/en/fo/st\\_\\_george.html](http://www.blm.gov/ut/st/en/fo/st__george.html)



BLM

St. George Field Office



# WILDERNESS

In 1806, Meriwether Lewis and William Clark were inspired by the untamed beauty and expanse of the American West and its wild places. Yet, less than 200 years after Lewis and Clark made their historic journey of exploration, America's wild places had virtually disappeared. In 1964, the U.S. Congress, by a nearly unanimous vote, enacted landmark legislation to permanently protect the most natural places that remained in America. The Wilderness Act of 1964 established the National Wilderness Preservation System to "secure for the American people of present and future generations the benefits of an enduring resource of wilderness."



BLM

## How much BLM-Managed Wilderness is there in Washington County?

Through the Omnibus Public Land Management Act of 2009, Congress designated approximately 129,300 acres of BLM-managed public lands as new wilderness in Washington County, Utah. The St. George Field Office now manages nearly 132,000 acres of designated wilderness in 15 wilderness areas ranging in size from the 32-acre Taylor Creek Wilderness to the 44,530-acre Canaan Mountain Wilderness.

## How is Wilderness Managed?

Many misconceptions exist about wilderness management. Some people think that wilderness is a "lock-up" of land where no public use can occur. Others think that all recreational activities are prohibited in wilderness. Neither is true. Primitive recreational activities such as hiking, horseback riding, hunting, camping, and fishing continue as authorized public uses in wilderness. For example, if livestock grazing is an ongoing activity when lands are designated as wilderness, it will continue as a valid use of those public lands. Scientific research and educational activities can also take place in wilderness. However, motorized and mechanized vehicle travel and equipment use are not authorized in designated wilderness without special authorization from the BLM (exceptions are made for emergency situations).

## Did the new Wilderness Designations Close Roads?

The new wilderness areas include very rugged, mountainous terrain and steep-sided canyons that are generally inaccessible by vehicle and have no roads. Within the 129,300 acres of newly-designated wilderness, less than 10 miles of roads were closed when the 14 new wilderness areas were designated in 2009. Over 1,200 miles of roads on public lands in Washington County remain open to motorized use.

## What's Ahead?

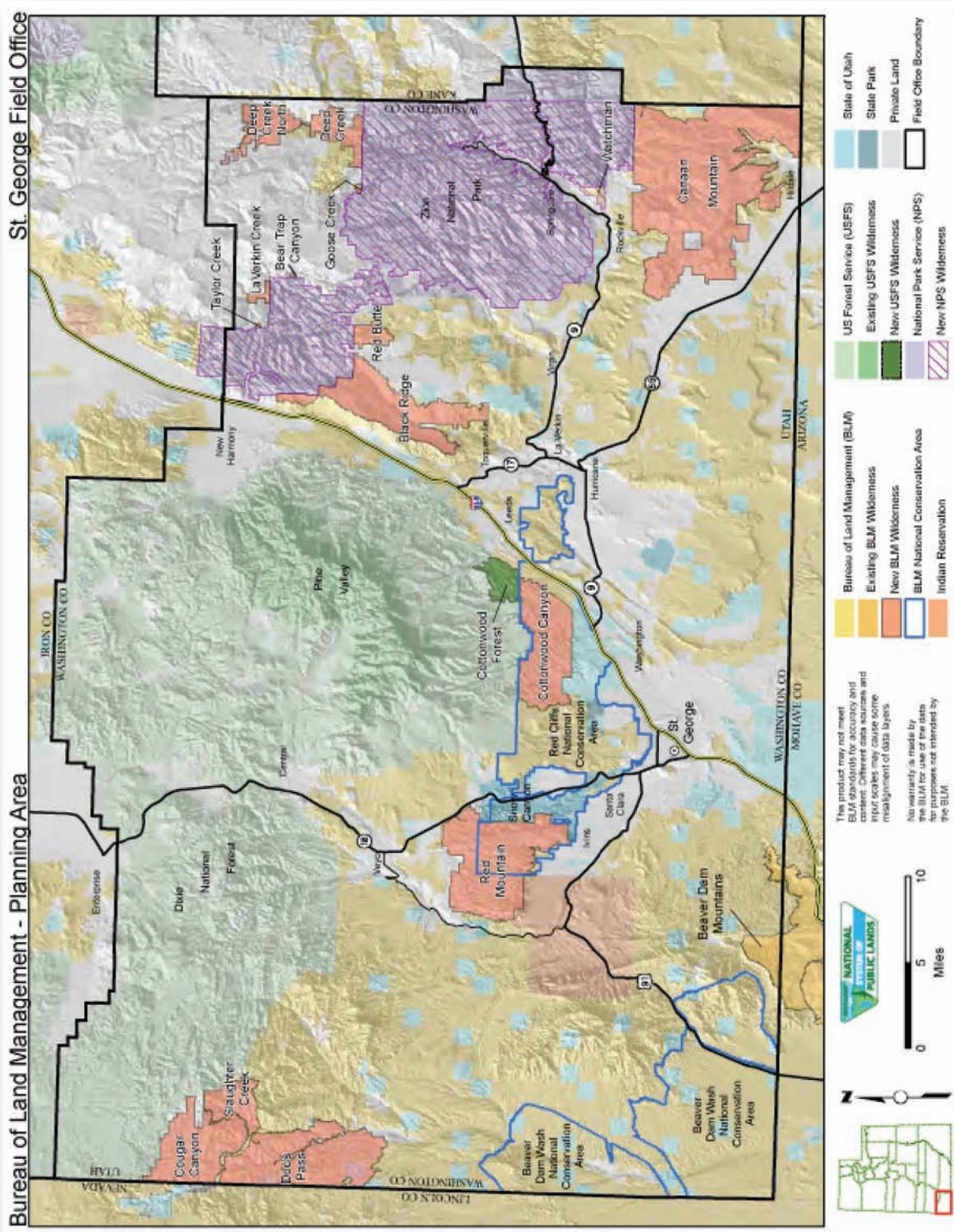
The map on the reverse side shows the locations of all BLM-managed wilderness areas in Washington County. More detailed maps are under development and will soon be available to the public. Management plans for the new wilderness areas will be completed by the BLM St. George Field Office through a public planning process, and will provide direction on the management of recreation, livestock grazing, fire suppression, and other administrative issues.

## More Information:

Additional information about these new wilderness areas can be found on the St. George Field Office web site at: [http://www.blm.gov/ut/st/en/fo/st\\_george.html](http://www.blm.gov/ut/st/en/fo/st_george.html)



St. George Field Office



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## APPENDIX G—THE OMNIBUS ACT (P.L. 111-11)

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### SUBTITLE O—WASHINGTON COUNTY, UTAH

#### SEC. 1971. DEFINITIONS.

In this subtitle:

- (1) BEAVER DAM WASH NATIONAL CONSERVATION AREA MAP.—The term “Beaver Dam Wash National Conservation Area Map” means the map entitled “Beaver Dam Wash National Conservation Area” and dated December 18, 2008.
- (2) CANAAN MOUNTAIN WILDERNESS MAP.—The term “Canaan Mountain Wilderness Map” means the map entitled “Canaan Mountain Wilderness” and dated June 21, 2008.
- (3) COUNTY.—The term “County” means Washington County, Utah.
- (4) NORTHEASTERN WASHINGTON COUNTY WILDERNESS MAP.—The term “Northeastern Washington County Wilderness Map” means the map entitled “Northeastern Washington County Wilderness” and dated November 12, 2008.
- (5) NORTHWESTERN WASHINGTON COUNTY WILDERNESS MAP.—The term “Northwestern Washington County Wilderness Map” means the map entitled “Northwestern Washington County Wilderness” and dated June 21, 2008.
- (6) RED CLIFFS NATIONAL CONSERVATION AREA MAP.—The term “Red Cliffs National Conservation Area Map” means the map entitled “Red Cliffs National Conservation Area” and dated  
November 12, 2008.
- (7) SECRETARY.—The term “Secretary” means—
  - (A) with respect to land under the jurisdiction of the Secretary of Agriculture, the Secretary of Agriculture; and
  - (B) with respect to land under the jurisdiction of the Secretary of the Interior, the Secretary of the Interior.
- (8) STATE.—The term “State” means the State of Utah.
- (9) WASHINGTON COUNTY GROWTH AND CONSERVATION ACT MAP.—The term “Washington County Growth and Conservation Act Map” means the map entitled “Washington County Growth and Conservation Act Map” and dated November 13, 2008.

#### SEC. 1972. WILDERNESS AREAS.

(a) ADDITIONS TO NATIONAL WILDERNESS PRESERVATION SYSTEM.—

- (1) ADDITIONS.—Subject to valid existing rights, the following land in the State is designated as wilderness and as components of the National Wilderness Preservation System:
  - (A) BEARTRAP CANYON.—Certain Federal land managed by the Bureau of Land Management, comprising approximately 40 acres, as generally depicted on the Northeastern Washington County Wilderness Map, which shall be known as the “Beartrap Canyon Wilderness”.

- (B) BLACKRIDGE.—Certain Federal land managed by the Bureau of Land Management, comprising approximately 13,015 acres, as generally depicted on the Northeastern Washington County Wilderness Map, which shall be known as the “Blackridge Wilderness”.
- (C) CANAAN MOUNTAIN.—Certain Federal land in the County managed by the Bureau of Land Management, comprising approximately 44,531 acres, as generally depicted on the Canaan Mountain Wilderness Map, which shall be known as the “Canaan Mountain Wilderness”.
- (D) COTTONWOOD CANYON.—Certain Federal land managed by the Bureau of Land Management, comprising approximately 11,712 acres, as generally depicted on the Red Cliffs National Conservation Area Map, which shall be known as the “Cottonwood Canyon Wilderness”.
- (E) COTTONWOOD FOREST.—Certain Federal land managed by the Forest Service, comprising approximately 2,643 acres, as generally depicted on the Red Cliffs National Conservation Area Map, which shall be known as the “Cottonwood Forest Wilderness”.
- (F) COUGAR CANYON.—Certain Federal land managed by the Bureau of Land Management, comprising approximately 10,409 acres, as generally depicted on the Northwestern Washington County Wilderness Map, which shall be known as the “Cougar Canyon Wilderness”.
- (G) DEEP CREEK.—Certain Federal land managed by the Bureau of Land Management, comprising approximately 3,284 acres, as generally depicted on the Northeastern Washington County Wilderness Map, which shall be known as the “Deep Creek Wilderness”.
- (H) DEEP CREEK NORTH.—Certain Federal land managed by the Bureau of Land Management, comprising approximately 4,262 acres, as generally depicted on the Northeastern Washington County Wilderness Map, which shall be known as the “Deep Creek North Wilderness”.
- (I) DOC’S PASS.—Certain Federal land managed by the Bureau of Land Management, comprising approximately 17,294 acres, as generally depicted on the Northwestern Washington County Wilderness Map, which shall be known as the “Doc’s Pass Wilderness”.
- (J) GOOSE CREEK.—Certain Federal land managed by the Bureau of Land Management, comprising approximately 98 acres, as generally depicted on the Northeastern Washington County Wilderness Map, which shall be known as the “Goose Creek Wilderness”.
- (K) LAVERKIN CREEK.—Certain Federal land managed by the Bureau of Land Management, comprising approximately 445 acres, as generally depicted on the Northeastern Washington County Wilderness Map, which shall be known as the “LaVerkin Creek Wilderness”.
- (L) RED BUTTE.—Certain Federal land managed by the Bureau of Land Management, comprising approximately 1,537 acres, as generally depicted on the Northeastern Washington County Wilderness Map, which shall be known as the “Red Butte Wilderness”.
- (M) RED MOUNTAIN.—Certain Federal land managed by the Bureau of Land Management, comprising approximately 18,729 acres, as generally depicted on the Red Cliffs National Conservation Area Map, which shall be known as the “Red Mountain Wilderness”.
- (N) SLAUGHTER CREEK.—Certain Federal land managed by the Bureau of Land Management, comprising approximately 3,901 acres, as generally depicted on the Northwestern Washington County Wilderness Map, which shall be known as the “Slaughter Creek Wilderness”.
- (O) TAYLOR CREEK.—Certain Federal land managed by the Bureau of Land Management, comprising approximately 32 acres, as generally depicted on the Northeastern Washington County Wilderness Map, which shall be known as the “Taylor Creek Wilderness”.

(2) MAPS AND LEGAL DESCRIPTIONS.—

(A) IN GENERAL.—As soon as practicable after the date of enactment of this Act, the Secretary shall submit to the Committee on Energy and Natural Resources of the Senate and the Committee on Natural Resources of the House of Representatives a map and legal description of each wilderness area designated by paragraph (1).

(B) FORCE AND EFFECT.—Each map and legal description submitted under subparagraph (A) shall have the same force and effect as if included in this subtitle, except that the Secretary may correct any clerical or typographical errors in the map or legal description.

(C) AVAILABILITY.—Each map and legal description submitted under subparagraph (A) shall be available in the appropriate offices of—

- (i) the Bureau of Land Management; and
- (ii) the Forest Service.

(b) ADMINISTRATION OF WILDERNESS AREAS.—

(1) MANAGEMENT.—Subject to valid existing rights, each area designated as wilderness by subsection (a)(1) shall be administered by the Secretary in accordance with the Wilderness Act (16 U.S.C. 1131 et seq.), except that—

(A) any reference in the Wilderness Act to the effective date of that Act shall be considered to be a reference to the date of enactment of this Act; and

(B) any reference in the Wilderness Act to the Secretary of Agriculture shall be considered to be a reference to the Secretary that has jurisdiction over the land.

(2) LIVESTOCK.—The grazing of livestock in each area designated as wilderness by subsection (a)(1), where established before the date of enactment of this Act, shall be permitted to continue—

(A) subject to such reasonable regulations, policies, and practices that the Secretary considers necessary; and

(B) in accordance with—

(i) section 4(d)(4) of the Wilderness Act (16 U.S.C. 1133(d)(4)); and

(ii) the guidelines set forth in Appendix A of the report of the Committee on Interior and Insular Affairs of the House of Representatives accompanying H.R. 2570 of the 101st Congress (H.Rep. 101-405) and H.R. 5487 of the 96th Congress (H. Rept. 96-617).

(3) WILDFIRE, INSECT, AND DISEASE MANAGEMENT.—In accordance with section 4(d)(1) of the Wilderness Act (16 U.S.C. 1133(d)(1)), the Secretary may take such measures in each area designated as wilderness by subsection (a)(1) as the Secretary determines to be necessary for the control of fire, insects, and diseases (including, as the Secretary determines to be appropriate, the coordination of those activities with a State or local agency).

(4) BUFFER ZONES.—

(A) IN GENERAL.—Nothing in this section creates a protective perimeter or buffer zone around any area designated as wilderness by subsection (a)(1).

(B) ACTIVITIES OUTSIDE WILDERNESS.—The fact that an activity or use on land outside any area designated as wilderness by subsection (a)(1) can be seen or heard within the wilderness shall not preclude the activity or use outside the boundary of the wilderness.

(5) MILITARY OVERFLIGHTS.—Nothing in this section restricts or precludes—

(A) low-level overflights of military aircraft over any area designated as wilderness by subsection (a)(1), including military overflights that can be seen or heard within any wilderness area;

(B) flight testing and evaluation; or

(C) the designation or creation of new units of special use airspace, or the establishment of military flight training routes over any wilderness area.

(6) ACQUISITION AND INCORPORATION OF LAND AND INTERESTS IN LAND.—

(A) ACQUISITION AUTHORITY.—In accordance with applicable laws (including regulations), the Secretary may acquire any land or interest in land within the boundaries of the wilderness areas designated by subsection (a)(1) by purchase from willing sellers, donation, or exchange.

(B) INCORPORATION.—Any land or interest in land acquired by the Secretary under subparagraph (A) shall be incorporated into, and administered as a part of, the wilderness area in which the land or interest in land is located.

(7) NATIVE AMERICAN CULTURAL AND RELIGIOUS USES.—Nothing in this section diminishes—

(A) the rights of any Indian tribe; or

(B) any tribal rights regarding access to Federal land for tribal activities, including spiritual, cultural, and traditional food-gathering activities.

(8) CLIMATOLOGICAL DATA COLLECTION.—In accordance with the Wilderness Act (16 U.S.C. 1131 et seq.) and subject to such terms and conditions as the Secretary may prescribe, the Secretary may authorize the installation and maintenance of hydrologic, meteorologic, or climatological collection devices in the wilderness areas designated by subsection (a)(1) if the Secretary determines that the facilities and access to the facilities are essential to flood warning, flood control, or water reservoir operation activities.

(9) WATER RIGHTS.—

(A) STATUTORY CONSTRUCTION.—Nothing in this section—

(i) shall constitute or be construed to constitute either an express or implied reservation by the United States of any water or water rights with respect to the land designated as wilderness by subsection (a)(1);

(ii) shall affect any water rights in the State existing on the date of enactment of this Act, including any water rights held by the United States;

(iii) shall be construed as establishing a precedent with regard to any future wilderness designations;

(iv) shall affect the interpretation of, or any designation made pursuant to, any other Act; or

(v) shall be construed as limiting, altering, modifying, or amending any of the interstate compacts or equitable apportionment decrees that apportion water among and between the State and other States.

(B) STATE WATER LAW.—The Secretary shall follow the procedural and substantive requirements of the law of the State in order to obtain and hold any water rights not in existence on the date of enactment of this Act with respect to the wilderness areas designated by subsection (a)(1).

(10) FISH AND WILDLIFE.—

(A) JURISDICTION OF STATE.—Nothing in this section affects the jurisdiction of the State with respect to fish and wildlife on public land located in the State.

(B) AUTHORITY OF SECRETARY.—In furtherance of the purposes and principles of the Wilderness Act (16 U.S.C. 1131 et seq.), the Secretary may carry out management activities to maintain or restore fish and wildlife populations (including activities to maintain and restore fish and wildlife habitats to support the populations) in any wilderness area designated by subsection (a)(1) if the activities are—

(i) consistent with applicable wilderness management plans; and

(ii) carried out in accordance with—

(I) the Wilderness Act (16 U.S.C. 1131 et seq.); and

(II) applicable guidelines and policies, including applicable policies described in Appendix B of House Report 101–405.

(11) WILDLIFE WATER DEVELOPMENT PROJECTS.—Subject to paragraph (12), the Secretary may authorize structures and facilities, including existing structures and facilities, for wildlife water development projects, including guzzlers, in the wilderness areas designated by subsection (a)(1) if—

(A) the structures and facilities will, as determined by the Secretary, enhance wilderness values by promoting healthy, viable, and more naturally distributed wildlife populations; and

(B) the visual impacts of the structures and facilities on the wilderness areas can reasonably be minimized.

(12) COOPERATIVE AGREEMENT.—Not later than 1 year after the date of enactment of this Act, the Secretary shall enter into a cooperative agreement with the State that specifies the terms and conditions under which wildlife management activities in the wilderness areas designated by subsection (a)(1) may be carried out.

(c) RELEASE OF WILDERNESS STUDY AREAS.—

(1) FINDING.—Congress finds that, for the purposes of section 603 of the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1782), the public land in the County administered by the Bureau of Land Management has been adequately studied for wilderness designation.

(2) RELEASE.—Any public land described in paragraph (1) that is not designated as wilderness by subsection (a)(1)—

(A) is no longer subject to section 603(c) of the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1782(c)); and

(B) shall be managed in accordance with applicable law and the land management plans adopted under section 202 of that Act (43 U.S.C. 1712).

(d) TRANSFER OF ADMINISTRATIVE JURISDICTION TO NATIONAL PARK SERVICE.—Administrative jurisdiction over the land identified as the Watchman Wilderness on the Northeastern Washington County Wilderness Map is hereby transferred to the National Park Service, to be included in, and administered as part of Zion National Park.

## **SEC. 1973. ZION NATIONAL PARK WILDERNESS.**

(a) DEFINITIONS.—In this section:

(1) FEDERAL LAND.—The term “Federal land” means certain Federal land—

(A) that is—

- (i) located in the County and Iron County, Utah; and
- (ii) managed by the National Park Service;

(B) consisting of approximately 124,406 acres; and

(C) as generally depicted on the Zion National Park Wilderness Map and the area added to the park under section 1972(d).

(2) WILDERNESS AREA.—The term “Wilderness Area” means the Zion Wilderness designated by subsection (b)(1).

(3) ZION NATIONAL PARK WILDERNESS MAP.—The term “Zion National Park Wilderness Map” means the map entitled “Zion National Park Wilderness” and dated April 2008.

(b) ZION NATIONAL PARK WILDERNESS.—

(1) DESIGNATION.—Subject to valid existing rights, the Federal land is designated as wilderness and as a component of the National Wilderness Preservation System, to be known as the “Zion Wilderness”.

(2) INCORPORATION OF ACQUIRED LAND.—Any land located in the Zion National Park that is acquired by the Secretary through a voluntary sale, exchange, or donation may, on the recommendation of the Secretary, become part of the Wilderness Area, in accordance with the Wilderness Act (16 U.S.C. 1131 et seq.).

(3) MAP AND LEGAL DESCRIPTION.—

(A) IN GENERAL.—As soon as practicable after the date of enactment of this Act, the Secretary shall submit to the Committee on Energy and Natural Resources of the Senate and the Committee on Natural Resources of the House of Representatives a map and legal description of the Wilderness Area.

(B) FORCE AND EFFECT.—The map and legal description submitted under subparagraph (A) shall have the same force and effect as if included in this Act, except that the Secretary may correct any clerical or typographical errors in the map or legal description.

(C) AVAILABILITY.—The map and legal description submitted under subparagraph (A) shall be available in the appropriate offices of the National Park Service.

## **SEC. 1974. RED CLIFFS NATIONAL CONSERVATION AREA.**

(a) PURPOSES.—The purposes of this section are—

(1) to conserve, protect, and enhance for the benefit and enjoyment of present and future generations the ecological, scenic, wildlife, recreational, cultural, historical, natural, educational, and scientific resources of the National Conservation Area; and

(2) to protect each species that is—

(A) located in the National Conservation Area; and

(B) listed as a threatened or endangered species on the list of threatened species or the list of endangered species published under section 4(c)(1) of the Endangered Species Act of 1973 (16 U.S.C. 1533(c)(1)).

(b) DEFINITIONS.—In this section:

(1) **HABITAT CONSERVATION PLAN.**—The term “habitat conservation plan” means the conservation plan entitled “Washington County Habitat Conservation Plan” and dated February 23, 1996.

(2) **MANAGEMENT PLAN.**—The term “management plan” means the management plan for the National Conservation Area developed by the Secretary under subsection (d)(1).

(3) **NATIONAL CONSERVATION AREA.**—The term “National Conservation Area” means the Red Cliffs National Conservation Area that—

(A) consists of approximately 44,725 acres of public land in the County, as generally depicted on the Red Cliffs National Conservation Area Map; and

(B) is established by subsection (c).

(4) **PUBLIC USE PLAN.**—The term “public use plan” means the use plan entitled “Red Cliffs Desert Reserve Public Use Plan” and dated June 12, 2000, as amended.

(5) **RESOURCE MANAGEMENT PLAN.**—The term “resource management plan” means the management plan entitled “St. George Field Office Resource Management Plan” and dated March 15, 1999, as amended.

(c) **ESTABLISHMENT.**—Subject to valid existing rights, there is established in the State the Red Cliffs National Conservation Area.

(d) **MANAGEMENT PLAN.**—

(1) **IN GENERAL.**—Not later than 3 years after the date of enactment of this Act and in accordance with paragraph (2), the Secretary shall develop a comprehensive plan for the long-term management of the National Conservation Area.

(2) **CONSULTATION.**—In developing the management plan required under paragraph (1), the Secretary shall consult with—

(A) appropriate State, tribal, and local governmental entities; and

(B) members of the public.

(3) **INCORPORATION OF PLANS.**—In developing the management plan required under paragraph (1), to the extent consistent with this section, the Secretary may incorporate any provision of—

(A) the habitat conservation plan;

(B) the resource management plan; and

(C) the public use plan.

(e) **MANAGEMENT.**—

(1) **IN GENERAL.**—The Secretary shall manage the National Conservation Area—

(A) in a manner that conserves, protects, and enhances the resources of the National Conservation Area; and

(B) in accordance with—

(i) the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1701 et seq.);

(ii) this section; and

(iii) any other applicable law (including regulations).

(2) USES.—The Secretary shall only allow uses of the National Conservation Area that the Secretary determines would further a purpose described in subsection (a).

(3) MOTORIZED VEHICLES.—Except in cases in which motorized vehicles are needed for administrative purposes, or to respond to an emergency, the use of motorized vehicles in the National Conservation Area shall be permitted only on roads designated by the management plan for the use of motorized vehicles.

(4) GRAZING.—The grazing of livestock in the National Conservation Area, where established before the date of enactment of this Act, shall be permitted to continue—

(A) subject to—

(i) such reasonable regulations, policies, and practices as the Secretary considers necessary; and

(ii) applicable law; and

(B) in a manner consistent with the purposes described in subsection (a).

(5) WILDLAND FIRE OPERATIONS.—Nothing in this section prohibits the Secretary, in cooperation with other Federal, State, and local agencies, as appropriate, from conducting wildland fire operations in the National Conservation Area, consistent with the purposes of this section.

(f) INCORPORATION OF ACQUIRED LAND AND INTERESTS.—Any land or interest in land that is located in the National Conservation Area that is acquired by the United States shall—

(1) become part of the National Conservation Area; and

(2) be managed in accordance with—

(A) the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1701 et seq.);

(B) this section; and

(C) any other applicable law (including regulations).

(g) WITHDRAWAL.—

(1) IN GENERAL.—Subject to valid existing rights, all Federal land located in the National Conservation Area are withdrawn from—

(A) all forms of entry, appropriation, and disposal under the public land laws;

(B) location, entry, and patenting under the mining laws; and

(C) operation of the mineral leasing, mineral materials, and geothermal leasing laws.

(2) ADDITIONAL LAND.—If the Secretary acquires additional land that is located in the National Conservation Area after the date of enactment of this Act, the land is withdrawn from operation of the laws referred to in paragraph (1) on the date of acquisition of the land.

(h) EFFECT.—Nothing in this section prohibits the authorization of the development of utilities within the National Conservation Area if the development is carried out in accordance with—

(1) each utility development protocol described in the habitat conservation plan; and

(2) any other applicable law (including regulations).

## SEC. 1975. BEAVER DAM WASH NATIONAL CONSERVATION AREA.

(a) PURPOSE.—The purpose of this section is to conserve, protect, and enhance for the benefit and enjoyment of present and future generations the ecological, scenic, wildlife, recreational, cultural, historical, natural, educational, and scientific resources of the Beaver Dam Wash National Conservation Area.

(b) DEFINITIONS.—In this section:

(1) MANAGEMENT PLAN.—The term “management plan” means the management plan for the National Conservation Area developed by the Secretary under subsection (d)(1).

(2) NATIONAL CONSERVATION AREA.—The term “National Conservation Area” means the Beaver Dam Wash National Conservation Area that—

(A) consists of approximately 68,083 acres of public land in the County, as generally depicted on the Beaver Dam Wash National Conservation Area Map; and

(B) is established by subsection (c).

(c) ESTABLISHMENT.—Subject to valid existing rights, there is established in the State the Beaver Dam Wash National Conservation Area.

(d) MANAGEMENT PLAN.—

(1) IN GENERAL.—Not later than 3 years after the date of enactment of this Act and in accordance with paragraph (2), the Secretary shall develop a comprehensive plan for the long-term management of the National Conservation Area.

(2) CONSULTATION.—In developing the management plan required under paragraph (1), the Secretary shall consult with—

(A) appropriate State, tribal, and local governmental entities; and

(B) members of the public.

(3) MOTORIZED VEHICLES.—In developing the management plan required under paragraph (1), the Secretary shall incorporate the restrictions on motorized vehicles described in subsection (e)(3).

(e) MANAGEMENT.—

(1) IN GENERAL.—The Secretary shall manage the National Conservation Area—

(A) in a manner that conserves, protects, and enhances the resources of the National Conservation Area; and

(B) in accordance with—

(i) the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1701 et seq.);

(ii) this section; and

(iii) any other applicable law (including regulations).

(2) USES.—The Secretary shall only allow uses of the National Conservation Area that the Secretary determines would further the purpose described in subsection (a).

(3) MOTORIZED VEHICLES.—

(A) IN GENERAL.—Except in cases in which motorized vehicles are needed for administrative purposes, or to respond to an emergency, the use of motorized vehicles in the National Conservation Area shall be permitted only on roads designated by the management plan for the use of motorized vehicles.

(B) ADDITIONAL REQUIREMENT RELATING TO CERTAIN AREAS LOCATED IN THE NATIONAL CONSERVATION AREA.— In addition to the requirement described in subparagraph (A), with respect to the areas designated on the Beaver Dam Wash National Conservation Area Map as “Designated Road Areas”, motorized vehicles shall be permitted only on the roads identified on such map.

(4) GRAZING.—The grazing of livestock in the National Conservation Area, where established before the date of enactment of this Act, shall be permitted to continue—

(A) subject to—

(i) such reasonable regulations, policies, and practices as the Secretary considers necessary; and

(ii) applicable law (including regulations); and

(B) in a manner consistent with the purpose described in subsection (a).

(5) WILDLAND FIRE OPERATIONS.—Nothing in this section prohibits the Secretary, in cooperation with other Federal, State, and local agencies, as appropriate, from conducting wildland fire operations in the National Conservation Area, consistent with the purposes of this section.

(f) INCORPORATION OF ACQUIRED LAND AND INTERESTS.—Any land or interest in land that is located in the National Conservation Area that is acquired by the United States shall—

(1) become part of the National Conservation Area; and

(2) be managed in accordance with—

(A) the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1701 et seq.);

(B) this section; and

(C) any other applicable law (including regulations).

(g) WITHDRAWAL.—

(1) IN GENERAL.—Subject to valid existing rights, all Federal land located in the National Conservation Area is withdrawn from—

(A) all forms of entry, appropriation, and disposal under the public land laws;

(B) location, entry, and patenting under the mining laws; and

(C) operation of the mineral leasing, mineral materials, and geothermal leasing laws.

(2) ADDITIONAL LAND.—If the Secretary acquires additional land that is located in the National Conservation Area after the date of enactment of this Act, the land is withdrawn from operation of the laws referred to in paragraph (1) on the date of acquisition of the land.

## **SEC. 1976. ZION NATIONAL PARK WILD AND SCENIC RIVER DESIGNATION.**

(a) DESIGNATION.—Section 3(a) of the Wild and Scenic Rivers Act (16 U.S.C. 1274(a)) (as amended by section 1852) is amended by adding at the end the following:

“(204) ZION NATIONAL PARK, UTAH.—The approximately 165.5 miles of segments of the Virgin River and tributaries of the Virgin River across Federal land within and adjacent to Zion National Park, as generally depicted on the map entitled ‘Wild and Scenic River Segments Zion National Park and Bureau of Land Management’ and dated April 2008, to be administered by the Secretary of the Interior in the following classifications:

“(A) TAYLOR CREEK.—The 4.5-mile segment from the junction of the north, middle, and south forks of Taylor Creek, west to the park boundary and adjacent land rim-to-rim, as a scenic river.

“(B) NORTH FORK OF TAYLOR CREEK.—The segment from the head of North Fork to the junction with Taylor Creek and adjacent land rim-to-rim, as a wild river.

“(C) MIDDLE FORK OF TAYLOR CREEK.—The segment from the head of Middle Fork on Bureau of Land Management land to the junction with Taylor Creek and adjacent land rim-to-rim, as a wild river.

“(D) SOUTH FORK OF TAYLOR CREEK.—The segment from the head of South Fork to the junction with Taylor Creek and adjacent land rim-to-rim, as a wild river.

“(E) TIMBER CREEK AND TRIBUTARIES.—The 3.1-mile segment from the head of Timber Creek and tributaries of Timber Creek to the junction with LaVerkin Creek and adjacent land rim-to-rim, as a wild river.

“(F) LAVERKIN CREEK.—The 16.1-mile segment beginning in T. 38 S., R. 11 W., sec. 21, on Bureau of Land Management land, southwest through Zion National Park, and ending at the south end of T. 40 S., R. 12 W., sec. 7, and adjacent land 1/2-mile wide, as a wild river.

“(G) WILLIS CREEK.—The 1.9-mile segment beginning on Bureau of Land Management land in the SWSW sec. 27, T. 38 S., R. 11 W., to the junction with LaVerkin Creek in Zion National Park and adjacent land rim-to-rim, as a wild river.

“(H) BEARTRAP CANYON.—The 2.3-mile segment beginning on Bureau of Management land in the SWNW sec. 3, T. 39 S., R. 11 W., to the junction with LaVerkin Creek and the segment from the headwaters north of Long Point to the junction with LaVerkin Creek and adjacent land rim-to-rim, as a wild river.

“(I) HOP VALLEY CREEK.—The 3.3-mile segment beginning at the southern boundary of T. 39 S., R. 11 W., sec. 20, to the junction with LaVerkin Creek and adjacent land 1/2-mile wide, as a wild river.

“(J) CURRENT CREEK.—The 1.4-mile segment from the head of Current Creek to the junction with LaVerkin Creek and adjacent land rim-to-rim, as a wild river.

“(K) CANE CREEK.—The 0.6-mile segment from the head of Smith Creek to the junction with LaVerkin Creek and adjacent land 1/2-mile wide, as a wild river.

“(L) SMITH CREEK.—The 1.3-mile segment from the head of Smith Creek to the junction with LaVerkin Creek and adjacent land 1/2-mile wide, as a wild river.

“(M) NORTH CREEK LEFT AND RIGHT FORKS.—The segment of the Left Fork from the junction with Wildcat Canyon to the junction with Right Fork, from the head of Right Fork to the junction with Left Fork, and from the junction of the Left and Right Forks southwest to Zion National Park boundary and adjacent land rim-to-rim, as a wild river.

“(N) WILDCAT CANYON (BLUE CREEK).—The segment of Blue Creek from the Zion National Park boundary to the junction with the Right Fork of North Creek and adjacent land rim-to-rim, as a wild river.

- “(O) LITTLE CREEK.—The segment beginning at the head of Little Creek to the junction with the Left Fork of North Creek and adjacent land 1/2-mile wide, as a wild river.
- “(P) RUSSELL GULCH.—The segment from the head of Russell Gulch to the junction with the Left Fork of North Creek and adjacent land rim-to-rim, as a wild river.
- “(Q) GRAPEVINE WASH.—The 2.6-mile segment from the Lower Kolob Plateau to the junction with the Left Fork of North Creek and adjacent land rim-to-rim, as a scenic river.
- “(R) PINE SPRING WASH.—The 4.6-mile segment to the junction with the left fork of North Creek and adjacent land 1/2-mile, as a scenic river.
- “(S) WOLF SPRINGS WASH.—The 1.4-mile segment from the head of Wolf Springs Wash to the junction with Pine Spring Wash and adjacent land 1/2-mile wide, as a scenic river.
- “(T) KOLOB CREEK.—The 5.9-mile segment of Kolob Creek beginning in T. 39 S., R. 10 W., sec. 30, through Bureau of Land Management land and Zion National Park land to the junction with the North Fork of the Virgin River and adjacent land rim-to-rim, as a wild river.
- “(U) OAK CREEK.—The 1-mile stretch of Oak Creek beginning in T. 39 S., R. 10 W., sec. 19, to the junction with Kolob Creek and adjacent land rim-to-rim, as a wild river.
- “(V) GOOSE CREEK.—The 4.6-mile segment of Goose Creek from the head of Goose Creek to the junction with the North Fork of the Virgin River and adjacent land rim-to-rim, as a wild river.
- “(W) DEEP CREEK.—The 5.3-mile segment of Deep Creek beginning on Bureau of Land Management land at the northern boundary of T. 39 S., R. 10 W., sec. 23, south to the junction of the North Fork of the Virgin River and adjacent land rim-to-rim, as a wild river.
- “(X) NORTH FORK OF THE VIRGIN RIVER.—The 10.8-mile segment of the North Fork of the Virgin River beginning on Bureau of Land Management land at the eastern border of T. 39 S., R. 10 W., sec. 35, to Temple of Sinawava and adjacent land rim-to-rim, as a wild river.
- “(Y) NORTH FORK OF THE VIRGIN RIVER.—The 8-mile segment of the North Fork of the Virgin River from Temple of Sinawava south to the Zion National Park boundary and adjacent land 1/2-mile wide, as a recreational river.
- “(Z) IMLAY CANYON.—The segment from the head of Imlay Creek to the junction with the North Fork of the Virgin River and adjacent land rim-to-rim, as a wild river.
- “(AA) ORDERVILLE CANYON.—The segment from the eastern boundary of Zion National Park to the junction with the North Fork of the Virgin River and adjacent land rim-to-rim, as a wild river.
- “(BB) MYSTERY CANYON.—The segment from the head of Mystery Canyon to the junction with the North Fork of the Virgin River and adjacent land rim-to-rim, as a wild river.
- “(CC) ECHO CANYON.—The segment from the eastern boundary of Zion National Park to the junction with the North Fork of the Virgin River and adjacent land rimto- rim, as a wild river.
- “(DD) BEHUNIN CANYON.—The segment from the head of Behunin Canyon to the junction with the North Fork of the Virgin River and adjacent land rim-to-rim, as a wild river.
- “(EE) HEAPS CANYON.—The segment from the head of Heaps Canyon to the junction with the North Fork of the Virgin River and adjacent land rim-to-rim, as a wild river.
- “(FF) BIRCH CREEK.—The segment from the head of Birch Creek to the junction with the North Fork of the Virgin River and adjacent land 1/2-mile wide, as a wild river.

“(GG) OAK CREEK.—The segment of Oak Creek from the head of Oak Creek to where the forks join and adjacent land 1/2-mile wide, as a wild river.

“(HH) OAK CREEK.—The 1-mile segment of Oak Creek from the point at which the 2 forks of Oak Creek join to the junction with the North Fork of the Virgin River and adjacent land 1/2-mile wide, as a recreational river.

“(II) CLEAR CREEK.—The 6.4-mile segment of Clear Creek from the eastern boundary of Zion National Park to the junction with Pine Creek and adjacent land rim-to-rim, as a recreational river.

“(JJ) PINE CREEK.—The 2-mile segment of Pine Creek from the head of Pine Creek to the junction with Clear Creek and adjacent land rim-to-rim, as a wild river.

“(KK) PINE CREEK.—The 3-mile segment of Pine Creek from the junction with Clear Creek to the junction with the North Fork of the Virgin River and adjacent land rim-to-rim, as a recreational river.

“(LL) EAST FORK OF THE VIRGIN RIVER.—The 8-mile segment of the East Fork of the Virgin River from the eastern boundary of Zion National Park through Parunuweap Canyon to the western boundary of Zion National Park and adjacent land 1/2-mile wide, as a wild river.

“(MM) SHUNES CREEK.—The 3-mile segment of Shunes Creek from the dry waterfall on land administered by the Bureau of Land Management through Zion National Park to the western boundary of Zion National Park and adjacent land 1/2-mile wide as a wild river.”.

(b) INCORPORATION OF ACQUIRED NON-FEDERAL LAND.—If the United States acquires any non-Federal land within or adjacent to Zion National Park that includes a river segment that is contiguous to a river segment of the Virgin River designated as a wild, scenic, or recreational river by paragraph (204) of section 3(a) of the Wild and Scenic Rivers Act (16 U.S.C. 1274(a)) (as added by subsection (a)), the acquired river segment shall be incorporated in, and be administered as part of, the applicable wild, scenic, or recreational river.

(c) SAVINGS CLAUSE.—The amendment made by subsection (a) does not affect the agreement among the United States, the State, the Washington County Water Conservancy District, and the Kane County Water Conservancy District entitled “Zion National Park Water Rights Settlement Agreement” and dated December 4, 1996.

## **SEC. 1977. WASHINGTON COUNTY COMPREHENSIVE TRAVEL AND TRANSPORTATION MANAGEMENT PLAN.**

(a) DEFINITIONS.—In this section:

(1) SECRETARY.—The term “Secretary” means the Secretary of the Interior.

(2) SECRETARY CONCERNED.—The term “Secretary concerned” means—

(A) with respect to land managed by the Bureau of Land Management, the Secretary; and

(B) with respect to land managed by the Forest Service, the Secretary of Agriculture.

(3) TRAIL.—The term “trail” means the High Desert Off-Highway Vehicle Trail designated under subsection (c)(1)(A).

(4) TRAVEL MANAGEMENT PLAN.—The term “travel management plan” means the comprehensive travel and transportation management plan developed under subsection (b)(1).

(b) COMPREHENSIVE TRAVEL AND TRANSPORTATION MANAGEMENT PLAN.—

(1) **IN GENERAL.**—Not later than 3 years after the date of enactment of this Act, in accordance with the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1701 et seq.) and other applicable laws (including regulations), the Secretary, in consultation with appropriate Federal agencies and State, tribal, and local governmental entities, and after an opportunity for public comment, shall develop a comprehensive travel management plan for the land managed by the Bureau of Land Management in the County—

(A) to provide to the public a clearly marked network of roads and trails with signs and maps to promote—

- (i) public safety and awareness; and
- (ii) enhanced recreation and general access opportunities;

(B) to help reduce in the County growing conflicts arising from interactions between—

- (i) motorized recreation; and
- (ii) the important resource values of public land;

(C) to promote citizen-based opportunities for—

- (i) the monitoring and stewardship of the trail; and
- (ii) trail system management; and

(D) to support law enforcement officials in promoting—

- (i) compliance with off-highway vehicle laws (including regulations); and
- (ii) effective deterrents of abuses of public land.

(2) **SCOPE; CONTENTS.**—In developing the travel management plan, the Secretary shall—

(A) in consultation with appropriate Federal agencies, State, tribal, and local governmental entities (including the County and St. George City, Utah), and the public, identify 1 or more alternatives for a northern transportation route in the County;

(B) ensure that the travel management plan contains a map that depicts the trail; and

(C) designate a system of areas, roads, and trails for mechanical and motorized use.

(c) **DESIGNATION OF TRAIL.**—

(1) **DESIGNATION.**—

(A) **IN GENERAL.**—As a component of the travel management plan, and in accordance with subparagraph

(B), the Secretary, in coordination with the Secretary of Agriculture, and after an opportunity for public comment, shall designate a trail (which may include a system of trails)—

- (i) for use by off-highway vehicles; and
- (ii) to be known as the “High Desert Off-Highway Vehicle Trail”.

(B) **REQUIREMENTS.**—In designating the trail, the Secretary shall only include trails that are—

- (i) as of the date of enactment of this Act, authorized for use by off-highway vehicles; and
- (ii) located on land that is managed by the Bureau of Land Management in the County.

(C) NATIONAL FOREST LAND.—The Secretary of Agriculture, in coordination with the Secretary and in accordance with applicable law, may designate a portion of the trail on National Forest System land within the County.

(D) MAP.—A map that depicts the trail shall be on file and available for public inspection in the appropriate offices of—

- (i) the Bureau of Land Management; and
- (ii) the Forest Service.

(2) MANAGEMENT.—

(A) IN GENERAL.—The Secretary concerned shall manage the trail—

- (i) in accordance with applicable laws (including regulations);
- (ii) to ensure the safety of citizens who use the trail; and
- (iii) in a manner by which to minimize any damage to sensitive habitat or cultural resources.

(B) MONITORING; EVALUATION.—To minimize the impacts of the use of the trail on environmental and cultural resources, the Secretary concerned shall—

- (i) annually assess the effects of the use of offhighway vehicles on—
  - (I) the trail; and
  - (II) land located in proximity to the trail; and

- (ii) in consultation with the Utah Department of Natural Resources, annually assess the effects of the use of the trail on wildlife and wildlife habitat.

(C) CLOSURE.—The Secretary concerned, in consultation with the State and the County, and subject to subparagraph

(D), may temporarily close or permanently reroute a portion of the trail if the Secretary concerned determines that—

- (i) the trail is having an adverse impact on—
  - (I) wildlife habitats;
  - (II) natural resources;
  - (III) cultural resources; or
  - (IV) traditional uses;
- (ii) the trail threatens public safety; or
- (iii) closure of the trail is necessary—
  - (I) to repair damage to the trail; or
  - (II) to repair resource damage.

(D) REROUTING.—Any portion of the trail that is temporarily closed by the Secretary concerned under subparagraph

(C) may be permanently rerouted along any road or trail—

- (i) that is—
  - (I) in existence as of the date of the closure of the portion of the trail;

(II) located on public land; and

(III) open to motorized use; and

(ii) if the Secretary concerned determines that rerouting the portion of the trail would not significantly increase or decrease the length of the trail.

(E) NOTICE OF AVAILABLE ROUTES.—The Secretary, in coordination with the Secretary of Agriculture, shall ensure that visitors to the trail have access to adequate notice relating to the availability of trail routes through—

(i) the placement of appropriate signage along the trail; and

(ii) the distribution of maps, safety education materials, and other information that the Secretary concerned determines to be appropriate.

(3) EFFECT.—Nothing in this section affects the ownership, management, or other rights relating to any non-Federal land (including any interest in any non-Federal land).

## **SEC. 1978. LAND DISPOSAL AND ACQUISITION.**

(a) IN GENERAL.—Consistent with applicable law, the Secretary of the Interior may sell public land located within Washington County, Utah, that, as of July 25, 2000, has been identified for disposal in appropriate resource management plans.

(b) USE OF PROCEEDS.—

(1) IN GENERAL.—Notwithstanding any other provision of law (other than a law that specifically provides for a portion of the proceeds of a land sale to be distributed to any trust fund of the State), proceeds from the sale of public land under subsection (a) shall be deposited in a separate account in the Treasury to be known as the “Washington County, Utah Land Acquisition Account”.

(2) AVAILABILITY.—

(A) IN GENERAL.—Amounts in the account shall be available to the Secretary, without further appropriation, to purchase from willing sellers lands or interests in land within the wilderness areas and National Conservation Areas established by this subtitle.

(B) APPLICABILITY.—Any purchase of land or interest in land under subparagraph (A) shall be in accordance with applicable law.

## **SEC. 1979. MANAGEMENT OF PRIORITY BIOLOGICAL AREAS.**

(a) IN GENERAL.—In accordance with applicable Federal laws (including regulations), the Secretary of the Interior shall—

(1) identify areas located in the County where biological conservation is a priority; and

(2) undertake activities to conserve and restore plant and animal species and natural communities within such areas.

(b) GRANTS; COOPERATIVE AGREEMENTS.—In carrying out subsection (a), the Secretary of the Interior may make grants to, or enter into cooperative agreements with, State, tribal, and local governmental entities and private entities to conduct research, develop scientific analyses, and carry out any other initiative relating to the restoration or conservation of the areas.

## SEC. 1980. PUBLIC PURPOSE CONVEYANCES.

(a) IN GENERAL.—Notwithstanding the land use planning requirements of sections 202 and 203 of the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1712, 1713), upon the request of the appropriate local governmental entity, as described below, the Secretary shall convey the following parcels of public land without consideration, subject to the provisions of this section:

(1) TEMPLE QUARRY.—The approximately 122-acre parcel known as “Temple Quarry” as generally depicted on the Washington County Growth and Conservation Act Map as “Parcel B”, to the City of St. George, Utah, for open space and public recreation purposes.

(2) HURRICANE CITY SPORTS PARK.—The approximately 41- acre parcel as generally depicted on the Washington County Growth and Conservation Act Map as “Parcel C”, to the City of Hurricane, Utah, for public recreation purposes and public administrative offices.

(3) WASHINGTON COUNTY SCHOOL DISTRICT.—The approximately 70-acre parcel as generally depicted on the Washington County Growth and Conservation Act Map as “Parcel D”, to the Washington County Public School District for use for public school and related educational and administrative purposes.

(4) WASHINGTON COUNTY JAIL.—The approximately 80-acre parcel as generally depicted on the Washington County Growth and Conservation Act Map as “Parcel E”, to Washington County, Utah, for expansion of the Purgatory Correctional Facility.

(5) HURRICANE EQUESTRIAN PARK.—The approximately 40- acre parcel as generally depicted on the Washington County Growth and Conservation Act Map as “Parcel F”, to the City of Hurricane, Utah, for use as a public equestrian park.

(b) MAP AND LEGAL DESCRIPTIONS.—As soon as practicable after the date of enactment of this Act, the Secretary shall finalize legal descriptions of the parcels to be conveyed under this section. The Secretary may correct any minor errors in the map referenced in subsection (a) or in the applicable legal descriptions. The map and legal descriptions shall be on file and available for public inspection in the appropriate offices of the Bureau of Land Management.

(c) REVERSION.—

(1) IN GENERAL.—If any parcel conveyed under this section ceases to be used for the public purpose for which the parcel was conveyed, as described in subsection (a), the land shall, at the discretion of the Secretary based on his determination of the best interests of the United States, revert to the United States.

(2) RESPONSIBILITY OF LOCAL GOVERNMENTAL ENTITY.—If the Secretary determines pursuant to paragraph (1) that the land should revert to the United States, and if the Secretary determines that the land is contaminated with hazardous waste, the local governmental entity to which the land was conveyed shall be responsible for remediation of the contamination.

## SEC. 1981. CONVEYANCE OF DIXIE NATIONAL FOREST LAND.

(a) DEFINITIONS.—In this section:

(1) COVERED FEDERAL LAND.—The term “covered Federal land” means the approximately 66.07 acres of land in the Dixie National Forest in the State, as depicted on the map.

(2) LANDOWNER.—The term “landowner” means Kirk R. Harrison, who owns land in Pinto Valley, Utah.

(3) MAP.—The term “map” means the map entitled “Conveyance of Dixie National Forest Land” and dated December 18, 2008.

(4) SECRETARY.—The term “Secretary” means the Secretary of Agriculture.

(b) CONVEYANCE.—

(1) IN GENERAL.—The Secretary may convey to the landowner all right, title, and interest of the United States in and to any of the covered Federal land (including any improvements or appurtenances to the covered Federal land) by sale or exchange.

(2) LEGAL DESCRIPTION.—The exact acreage and legal description of the covered Federal land to be conveyed under paragraph (1) shall be determined by surveys satisfactory to the Secretary.

(3) CONSIDERATION.—

(A) IN GENERAL.—As consideration for any conveyance by sale under paragraph (1), the landowner shall pay to the Secretary an amount equal to the fair market value of any Federal land conveyed, as determined under subparagraph (B).

(B) APPRAISAL.—The fair market value of any Federal land that is conveyed under paragraph (1) shall be determined by an appraisal acceptable to the Secretary that is performed in accordance with—

- (i) the Uniform Appraisal Standards for Federal Land Acquisitions;
- (ii) the Uniform Standards of Professional Appraisal Practice; and
- (iii) any other applicable law (including regulations).

(4) DISPOSITION AND USE OF PROCEEDS.—

(A) DISPOSITION OF PROCEEDS.—The Secretary shall deposit the proceeds of any sale of land under paragraph

(1) in the fund established under Public Law 90–171 (commonly known as the “Sisk Act”) (16 U.S.C. 484a).

(B) USE OF PROCEEDS.—Amounts deposited under subparagraph (A) shall be available to the Secretary, without further appropriation and until expended, for the acquisition of real property or interests in real property for inclusion in the Dixie National Forest in the State.

(5) ADDITIONAL TERMS AND CONDITIONS.—The Secretary may require any additional terms and conditions for any conveyance under paragraph (1) that the Secretary determines to be appropriate to protect the interests of the United States.

## **SEC. 1982. TRANSFER OF LAND INTO TRUST FOR SHIWITS BAND OF PAIUTE INDIANS.**

(a) DEFINITIONS.—In this section:

(1) PARCEL A.—The term “Parcel A” means the parcel that consists of approximately 640 acres of land that is—

- (A) managed by the Bureau of Land Management;
- (B) located in Washington County, Utah; and
- (C) depicted on the map entitled “Washington County Growth and Conservation Act Map”.

(2) SECRETARY.—The term “Secretary” means the Secretary of the Interior.

(3) TRIBE.—The term “Tribe” means the Shivwits Band of Paiute Indians of the State of Utah.

(b) PARCEL TO BE HELD IN TRUST.—

(1) IN GENERAL.—At the request of the Tribe, the Secretary shall take into trust for the benefit of the Tribe all right, title, and interest of the United States in and to Parcel A.

(2) SURVEY; LEGAL DESCRIPTION.—

(A) SURVEY.—Not later than 180 days after the date of enactment of this Act, the Secretary, acting through the Director of the Bureau of Land Management, shall complete a survey of Parcel A to establish the boundary of Parcel A.

(B) LEGAL DESCRIPTION OF PARCEL A.—

(i) IN GENERAL.—Upon the completion of the survey under subparagraph (A), the Secretary shall publish in the Federal Register a legal description of—

(I) the boundary line of Parcel A; and

(II) Parcel A.

(ii) TECHNICAL CORRECTIONS.—Before the date of publication of the legal descriptions under clause (i), the Secretary may make minor corrections to correct technical and clerical errors in the legal descriptions.

(iii) EFFECT.—Effective beginning on the date of publication of the legal descriptions under clause (i), the legal descriptions shall be considered to be the official legal descriptions of Parcel A.

(3) EFFECT.—Nothing in this section—

(A) affects any valid right in existence on the date of enactment of this Act;

(B) enlarges, impairs, or otherwise affects any right or claim of the Tribe to any land or interest in land other than to Parcel A that is—

(i) based on an aboriginal or Indian title; and

(ii) in existence as of the date of enactment of this Act; or

(C) constitutes an express or implied reservation of water or a water right with respect to Parcel A.

(4) LAND TO BE MADE A PART OF THE RESERVATION.—Land taken into trust pursuant to this section shall be considered to be part of the reservation of the Tribe.

## **SEC. 1983. AUTHORIZATION OF APPROPRIATIONS.**

There are authorized to be appropriated such sums as are necessary to carry out this subtitle.

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