

APPENDIX A — WRITTEN PUBLIC SCOPING COMMENTS

INTRODUCTION

This appendix contains public comments received during the scoping period for the Comprehensive Transportation and Travel Plan (Travel Plan) for the St. George Field Office. This includes 217 out of 724 comments received in all formats (i.e., hard copy letters and emails). The remaining comments were deemed to have been intended for the NCA Resource Management Plans (RMP) and the Amendment of the 1999 St. George RMP, which was scoped at the same time as the Travel Plan. Because of this, these comments are not found in this report, but in the Appendix A of the RMP Amendment scoping report. 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 the Route Designation process were added to 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).

ROUTE DESIGNATIONS

Comment: Trail by Smith Mesa to remain open.

Comment: I circled both Little Creek Mesa and the Arrowhead mountain bike areas on Map #1. Both of these biking areas are among the best bike riding in Utah & deserve to be kept in tack.

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: One thing I would like to see is the horse trail on Church Rocks separated from the mountain biking trail. Horses leave 4-6 inch holes in the sandy soil and make the trail unrideable at times.

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

Comment: Map #8 primitive road east of Dammeron Valley initial CG. This is a dirt track used only for hikers & horses. Why would you open this up to vehicles and ruin it for the rest of us? They already have access to the mountain on the dirt road where they are dumping trash and shooting. Please reconsider.

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: Map #1 6/14/10 - leave all existing jeep trails open.

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: Residents in our community worked very hard for 7 months to set up the Ranger Bart Trails west of Sun River beside the Virgin River. It is a quiet, tranquil trail used by hikers and bikers. We would NOT like to see this lovely trail spoiled by motorized vehicles and flies that would be on trail on horse droppings.

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: Map #3; Blue rectangle south of Dammeron Valley Initial RWP. This res. Trail wasn't a trail until power co. vehicles & ATV's started driving thru a wash. Also contractors hired to do fire brakes created an even bigger opening for 4x4 vehicles of all sizes. I've lived in Dammeron 6 yrs & up until only 3 yrs. Ago this was a mere wash & horsetrail.

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

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: Pahcoon Flat connect to Jackson Wash 100 yds for a loop connection SES.

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: Map #1 6/14/2010 - Outlined portion with name next to section on back side of dunes, southeast. Jeep trails: Arrowhead, smurffet, joint effort. Trails are established but not listed on map provided. These trails are primarily slick rock. I would like to see these trails recognized as used jeep trails and to remain open.

Comment: Map 1 - 6/15/10. Mesquite. JF map. Electronic shape file recorded

Comment: Map #1 - 6/16/10 - Rockville Bench - illegal bike trails should be foot traffic only - Grafton Mesa. No motorized routes either place.

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: I am also concerned about motorized routes through Confluence Park (Hurricane/LaVerkin). This is not BLM, but I would oppose any routes on BLM ground that provide connectivity to this area.

Comment: - Leave the Maildrop trail open; - Keep the route between Silverreef & Middleton; - Keep existing road access to the Babylon trail; - Keep road access to Gooseberry & retain mtn. bike trail access.

Comment: GPS & physically look at the roads and make a comprehensive travel plan.

Comment: Please don't close more roads & trails.

Comment: Existing routes and trails need to be GPS'd and included in a comprehensive route inventory (many are already gone!).

Comment: Have highway thru from SR9 northwest to I-15 thru Babylon Mill area, for future traffic & transportation needs. Instead of locking it all down for a choice few hikers, let us all have access.

Comment: Ref. Map #1 - Leanthen road to Mail Drop - closer to Mail Drop - road across Truelle H___(?) from SR9 - I-15 North of Leeds City.

Comment: New ATV trail from dirt road west of Little Creek Mesa near the new golf course. Steve has digitized the trail. This trail gives access to the top of the mesa which use to go up the Old Tower access road. Since the golf course was put in access has been very limited because you have to go thru the course. The trail has been cut; needs maintenance and signs.

Comment: Upper & Lower LaVerkin twist trails; Dry wash trail; Peters Leap and Ash Creek trail; Short Creek wash; Carean Mtn. to Saw Mill - S&R use; Red Mtn. trails - S&R use. Available to take on trails to GPS tracks verify etc.

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

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: Keep ATV's out of Stucki Springs & SCRR. Close Gooseberry White trail to ATV's & motorize use except by permit for private access.

Comment: Map #1 Hurricane -1- Connection from Gould's to golf course development to Little Creek. Map #2 Hurricane -2- Looking at potential for new trails that connect into Gould's. Map #1 Hurricane -3- Can't see a connection into LaVerkin. Map #1 Hurricane -4- Make the JEM trail a complete single track loop with the same feel. We need more beginner single track.

Comment: Little Creek Mesa needs to be dealt with. We have lots of people going out there and need to get trails designated. We have had OHV damage up there quite a bit. They are less likely to go out there if we have hikers and bikers out on the trails.

Comment: Map #1 Hurricane - Want to see trails addressed on Little Creek Mountain. Little Creek is my favorite place in the world to ride. The area needs to be protected & trails dedicated.

Comment: Map #1 Hurricane - Trails need to be limited & legal.

Comment: Map #1 Hurricane - This area is called Rockville Bench. It is on the "unofficial trails" GIS maps system. We would like this area to be added to the approved trails list. It has been in existence 10+ years and represents the closest riding area to Zion Nat'l. Park.

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 have marked an approximate alignment on the map for a commuter road similar to Skyline Drive ("Turtle Road") in St. George. This road would extend from the future intersection of the Southern Pkwy & SR-9 at approximately 2800 west in Hurricane and head northward to the Virgin River. A bridge crossing would have to be constructed. The alignment would then roughly follow the Babylon Road to Leeds and I-15. As we move into the future, this alignment will become a huge economic factor. This will also allow the travelling public the opportunity to enjoy the spectacular scenery that lies in this area, much like SR-9 through Z.N.P. There may be other alignments that can be considered to connect Hurricane & Leeds, but I believe the one I have described to be the best.

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

Comment: Please make a road from Babylon Mill to freeway.

Comment: Please keep open all existing roads & trails & make accessible to ATV's & foot & horse traffic so more people can access this beautiful land.

Comment: I feel it's very important to keep open all routes that exist. I'm involved with search & rescue and with the volunteers I work with feel we need to protect public access to these lands. (LaVerkin Twist, Ash Creek, Peter's Leap, Short Creek Wash, Cherry Stem on Canaan Mtn.) These are areas we already respond to these areas for request of assistance.

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: Ash Creek road/area is popular 4x4 route.

Comment: Upper & lower "Twisty" trails - looping from LaVerkin gun range to the Toquerville Falls. Popular 4x4 routes.

Comment: Smith Mesa has a road/trail off the eastern side - not on the map. Add to map.

Comment: 1. Possible road across SITLA land Warner Vly to Sand Mtn. area. Will send e-mail to Kyle Voylse. 2. Smith Mesa - Kiel knows dirt rd. 3. Ash Creek - dirt road open. 4. Gunlock stay open all roads. 5. Sand Mtn. stay open all roads.

Comment: Please do what you can about opening Little Creek Mesa to mtn. biking. I believe if you realign the trail away from any archaeological sites the bikers would stay away and off them. If you put white dots down like on Gooseberry - the bikers would stay within a foot or two of the trail.

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: Need route connection Wide Canyon. See map.

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

Comment: Search & rescue access to areas. Canaan Mtn. road shown on most maps. Dry Wash LaVerkin Twist trails above gun range. Seem lots of wilderness is being added. ATV & off road trails need to be fair. We use trails all over the county for search & rescue. A lot are life saving. We use for training and missions.

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: Map 1 6-16-10 - LaVerkin Twist on map; Dry Wash on map; Ash Creek, Peter's Leap, Short Creek.

Comment: Cherry stem on Canaan Search & Rescue administration route. Mail Drop cherry stem. All routes should be part of High Desert trails.

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: 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: I represent private property owners which own land just north of the Red Cliffs NCA along Babylon road. The town of Leeds approved 2,500 units on MSH Investment's property and neighboring private property. Our interests are two-fold: 1-preserve a transportation corridor along the existing Babylon Road corridor and 2-partner with the BLM in establishing improved trailheads on the boundary of the NCA and private property. A transportation corridor connecting Leeds and Hurricane will enhance general circulation between the two towns as well as improve economic development within the two municipalities. However, a 2-lane roadway between Leeds & Hurricane will serve as an important emergency route in the case of a natural or other disaster shutting off freeway access. The Red Hills Parkway in St. George is a good example of the type of transportation corridor that would serve Leeds and Hurricane well.

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: Would like to see Zen trail, Rockville Bench, and Guacamole Trail - all made official so we can see a bit of improvement and signage - those trails are amazing and need an official boost. Little Creek - we get hundreds of people a year asking us about the progress of Little Creek - signs out there for sure.

Comment: As far as roads being closed it would be my comment to keep all existing roads open.

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 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: 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: Lastly, it would be wonderful to build a trail system for mtn. biking and hiking on or near Utah Hill!

Comment: RET on Inventory Map; also, see maps attached to hardcopy comment. 01 - Grafton Mesa route from the top of the mesa down to Grafton townsite should remain open. 02 - Ash Creek is an extreme 4x4 challenge route. It is incorrectly identified on the route inventory as a dirt road. This route should remain open as a challenging primitive route.

Comment: RET on Inventory Map; also, see maps attached to hardcopy comment. 04 - The Scarecrow Peak trail as it runs along the conservation area boundary is not clearly marked on route inventory as it is obscured by the drawing of the boundary. This route should be clearly marked on the inventory. Also, the route down through Catclaw Canyon as it runs parallel to Beaver Dam Wash should remain open.

Comment: RET on Inventory Map; also, see maps attached to hardcopy comment. 05 - The Y route into the NCA should be included as an open route in the alternatives. 06 - The trail known as the LaVerkin Twist trail (otherwise known as Nephi's twist on some maps) starting at the LaVerkin shooting range & ending at Toquerville Falls should be added to the inventory starting @ (N 37.2180263, W 113.264408).

Comment: RET on Inventory Map; also, see maps attached to hardcopy comment. 07 - The West Mountain Peak trail (TV tower trail) should be included on the alternatives.

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. 09 - It is important to see that the trail known as "the Mail Drop" and the Broad Hollow road that runs along the east boundary of the Vermillion Cliffs wilderness be included in the preferred alternative.

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: RET on Inventory Map; also, see maps attached to hardcopy comment. 11 - The Canaan Mountain Road should be included all the way up to the Sawmill Spring as an administrative cherry stem.

Comment: RET on Inventory Map; also, see maps attached to hardcopy comment. 12 - The routes shown on the inventory throughout Bulldog Canyon and along the NCA boundary should be included on the preferred alternative.

Comment: RET on Inventory Map; also, see maps attached to hardcopy comment. 13 - All current cherry stems should be included in the preferred alternative.

Comment: RET on Inventory Map; also, see maps attached to hardcopy comment. It is important to me that the following attached routes be included on the preferred alternative: Smithsonian Butte, Grafton Mesa, West Mountain Peak, West Rim, Wire Mesa, Red Mountain, Hell Hole Pass, Hurricane Cliffs, Scarecrow Peak, Indian Springs, Grafton Ghost Town Rd, Joshua Tree Loop, and Ash Creek.

Comment: RET on Inventory Map; also, see maps attached to hardcopy comment. We encourage the BLM to include in its preferred alternative all routes on the inventory except for those that are redundant. We believe this will correct nearly all environmental damage caused by motorized recreation. The best way to protect the environment is to allow responsible recreation and use of the land, and to enforce abuses.

Comment: We have ridden trails West of Gunlock Reservoir, in Dammeron Valley hills, in the sand dunes east of Hurricane, in the mountains above Cedar city by Navajo Lake and down around Kolob Res. I have ridden all over in the Kanab area like Hog Canyon, Johnson Canyon, the East fork Virgin area, around Mt Carmel Junction. We have ridden out south of St George in the Arizona strip, I think it is called Black Mountain. We have ridden around the camp in the Virgin Gorge (Cedar something campground) and out west around Beaver Dam. We have ridden to the North of St. George from Red Cliffs coming down into St. George. We have ridden the Church Fork trail. That is great! It is a great area to come and visit and enjoy the beautiful scenery and warm temps in Spring and Fall. We ask that you keep these roads and trails open for us to enjoy.

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: 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 Utah 4x4 Club's position on this trail with the data they have submitted. These trails need to remain open for motorized use.

Comment: 3. High Desert ATV Trail

All routes shown on the BLM's inventory map should remain open. Roads that are used by full size vehicles that are designated as ATV routes for the High Desert Trail system should remain open to all OHV's. We oppose closing off any roads to full size vehicles except under special circumstances i.e. too narrow or not previously used by full sized.

Comment: 4. Ash Creek

We encourage keeping the old washed out road that is popular with users of highly modified 4x4's "buggies" as a technical challenge trail. Having these types of difficult trails in suitable locations where they do not damage resources give users of these type vehicles a suitable place to recreate and not have to use more sensitive areas.

Comment: We have also enjoyed riding in the Vermillion Cliffs, Grafton, Elephant Butte, Coral Pink Dunes, the Arizona Strip area and have ventured as far south as the area around Mt. Trumble, Whitmore and the north rim of the Grand Canyon.

As previously stated it would be a significant deterrent to us to return to the area for recreation in the future if there is a reduction of opportunities for ATV use in the area. We recognize the necessity of

effective management to govern the recreational use of our public lands. But we do not feel that the appropriate management method should be closing of the areas and thus preventing the recreational uses that currently exist.

Comment: it is critical that existing mountain bike trails be retained, and wherever possible, extended and improved. 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.

Gooseberry Mesa Area -- This is a classic destination mountain biking area near Apple Valley that is internationally known and revered. It is enjoyed by thousands of local and visiting mountain bikers every year. This is a list of the trails and sub-trails that I know of. There may be others. South Rim Trail North Rim Trail Windmill Trail

White Trail Slickrock 101 Trail Cattle Grate God's Skateboard Park Rattlesnake Rim The Point Yellow Trail Harris Secret Trail White Trail -- this basically a Jeep road, but offers easy biking that less experienced riders can enjoy. Rim Job Springdale Area Grafton Mesa -- <http://www.utahmountainbiking.com/trails/graftonmesa.htm> Guacamole Trail -- <http://www.utahmountainbiking.com/trails/guacamole.htm>

Rockville Bench - Slickrock Swamp -- <http://www.utahmountainbiking.com/trails/slikswmp.htm> Warner Valley Area Warner Valley -- <http://www.utahmountainbiking.com/trails/warner.htm> Warner Valley Cholla II Loop -- <http://www.utahmountainbiking.com/trails/warner-cholla2.htm> Little Creek Mountain (Mesa) Area -- Near Gooseberry Mesa, this is an important destination mountain biking area that is internationally known. This is a list of the trails and sub-trails that I know of. There may be others. West Mesa Loop Trail Slickrock Canyon Loop Trail Sandstone Canyon Loop Trail Hurricane Area Hurricane Rim Trail Gould's Rim Trail J.E.M. Trail -- internationally known mountain biking classic. Moenkopi Trail, plus La Verkin Creek -- <http://www.utahmountainbiking.com/trails/laverkin.htm> Santa Clara River Preserve

Anasazi Trail -- <http://www.utahmountainbiking.com/trails/anasazi.htm> Barrel Roll Trail, including Sidewinder and Cliffhanger -- <http://www.utahmountainbiking.com/trails/barrelroll.htm> -- excellent singletrack trails, and very popular. Barrel Trail -- <http://www.utahmountainbiking.com/trails/barrel.htm> Cove Wash -- <http://www.utahmountainbiking.com/trails/covewash.htm> Rim Rock, Rim Runner, Rim Rambler, Rim Reaper Trails -- <http://www.utahmountainbiking.com/trails/rimrock.htm> -- near the Barrel Roll Trail. Accessed from the same trailhead. Popular.

St. George Vicinity (outside of Red Cliffs NCA)

Bear Claw Poppy Trail -- accessed from the end of Navajo Drive in Bloomington, this is a classic, internationally known, and heavily used trail. The "rim" or southern branch of this trail comprises a major part of the Stucki Springs Loop. Bloomington Micro Loop -- part of the Bear Claw Poppy Trail network. Green Valley Raceway Trail -- <http://www.utahmountainbiking.com/trails/gvrace.htm> -- accessed from the south end of Canyon View Drive in St. George, this trail network includes the cross country and downhill trails used in the Huntsman World Senior Games mountain bike competition. The upper sections of trail follow the rim overlooking the Stucki Springs area. Red Mountain Trail -- <http://www.utahmountainbiking.com/trails/redmount.htm> -- this is a short, extremely rough, and difficult trail off of hwy 18 near Diamond Valley. Stucki Springs Loop -- part of the Bear Claw Poppy Trail network. Sunshine Loop -- <http://www.utahmountainbiking.com/trails/sunshine.htm> Zen Trail -- <http://www.utahmountainbiking.com/trails/zen.htm> -- excellent new trail. Accessed from the south end of Canyon View Drive in St. George. The upper sections of this trail follow the rim overlooking the Bear Claw Poppy Trail 1000 feet below.

Trails in the Red Cliffs NCA Chuckwalla Trailhead Area -- All of the trails in the area, except Gila, are extremely popular with mountain bikers, hikers and equestrians. Chuckwalla Trail Paradise Rim Trail -- this trail is usually combined with Turtle Wall Trail to make a loop. Turtle Wall Trail Beck Hill Trail Gila Trail -- sandy, but can be ridden when the sand contains some moisture. Scout Cave Trail -- the southern half is suitable for mountain biking. City Creek Area -- These trails are popular with local mountain bikers. City Creek - Rusty Cliffs Trail -- <http://www.utahmountainbiking.com/trails/citycrek.htm> Owen's Loop Trail (aka Bluff Street Cliffs) -- <http://www.utahmountainbiking.com/trails/bluffst.htm> Pioneer Park & Pioneer Rim Trails -- <http://www.utahmountainbiking.com/trails/pioneer.htm> Broken Mesa Area Broken Mesa Rim Trail -- from the trailhead south to the intersection with Ice House Trail. With fabulous territorial views and flowing lines, this trail, combined with Ice House Trail, has the potential be an exceptional mountain biking experience. Unfortunately, most of the trail tread consists of very rough lava outcroppings and baby-head sized lava rocks. If the trail could be smoothed out and/or rerouted in places it would be much more enjoyable to ride, and would get more use. Ice House Trail -- from Broken Mesa Rim Trail south to Green Springs. This trail has the same rough tread as the Rim Trail. Also, the southern end of the trail that drops down the side of the Broken Mesa into the Green Springs area needs major rehabilitation in order to be ridden by anyone other than an expert mountain biker. It is very steep, and consists of large lava boulders with no real tread. At the end of this trail there needs to be a clearly defined trail to complete the ride back to the turkey farm road. The Middleton Powerline Trail (a service road) might be enhanced to fulfill this function. Another trail is needed to route riders from the bottom of the mesa to the public streets in Green Springs. Red Cliffs and Grapevine Areas Cottonwood Trailhead -- very popular with mountain bikers Prospector Trail -- from Red Cliffs Rd. to Church Rocks Trail. The section west from the Cottonwood TH is extremely popular with mountain bikers. The eastern portion is probably not used as often, but is a very good mountain biking trail. Church Rocks Trail -- combined with the western section of the Prospector Trail, this is extremely popular with mountain bikers. Grapevine Trail -- very popular. Dino Cliffs Trail -- less well-known, but becoming popular. Makes a nice adjunct to the Prospector/Church Rocks ride. Babylon area -- This area is not well-known by mountain bikers, but has the potential for some good riding. Historic Babylon Trail Little Purgatory Trail

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: B. 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: 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: 4. Water Canyon and Short Creek Canyon should be designated as non-motorized use only.

Comment: Your plan must include a wide variety alternatives and not just choices of how to reduce or eliminate OHV recreation, these choices should also realize that enjoyable OHV recreation is on well marked and looped trails for single track motorcycles and 50 inch OHV trails, it is no fun riding up and down car roads.

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 ATV,s. Please leave all the trails open for all of us and not just a few.

Comment: Other BLM units in Utah have shown that OHV use can be sustainably managed with existing resources available through agency budget, Utah's State OHV Program and cooperative working relationships with user groups and local governments. 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.

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: Given the recent collaborative Wilderness process that resulted in new Wilderness designations in the area, I think that this Travel Management Plan revision should focus on the retention of as many motorized and mechanized routes as is possible.

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: 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: Regarding the road closure in the Goldstrike area in Southern Utah.

As a native of Southern Utah and frequent visitor to the Goldstrike property owned by the Bracken Family Trust, I would like to voice my concern regarding the road closure for this area. Closing the access to this property will take away from friends, family, and many generations to participate in the beauty and peacefulness of this area. Again, I would like to ask that the closure of this property be reconsidered and maintain open so that generations to come may continue to enjoy this wonderful area and family heritage.

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: 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: Manage Water and Short Canyons on the south side of Canaan Mountain for non-motorized use. These canyons are proposed for wilderness in ARWA 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: Don't take away, close or change ANY pre-designated trails.

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. 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: 2. The Washington County Search and Rescue (Chris Woodbury) has collected a good inventory of routes in the County. These would be available in an electronic format that could be easily transferred to the BLM database. I would urge that this inventory be added to the data on existing routes and incorporated into the final travel plan.

Comment: 3. The High Desert Trail proposal has been around since 2001. Thankfully, the one good thing that the Washington County Growth and Conservation Act was able to accomplish, was the mandate to designate this system in Washington County. I would urge that as a minimum, the original proposal be adopted. It is not complete, however, because it was a Phase 1 proposal only that was primarily concerned with the western part of the county. The Phase 2 part would have included tie-in routes along the southern county border to connect with the Sand Mountain and Hurricane, Utah areas and areas in the eastern portion of the county. Provisions should be made to investigate and formally add additional routes to complete the Washington County portion of the High Desert Trail. I would like to be involved in the final route selection because I have been involved with this concept since July 1999 and prepared the original formal proposal.

Comment: 5. The Wizards Motorcycle Club has been conducting a competitive off-road motorcycle race in the southern portion of the county for 27 years. I would urge that these routes be identified and designated in the final plan. Some of these routes are "single-track" routes. It would be good to designate them as such if possible.

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: 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 and our local members would like to thank the St. George Field Office for their work in developing and maintaining a model sustainable trail network. The area trail systems provide a broad variety of challenges and experiences so that all levels of mountain bikers can enjoy the area. The current management practices have made the St. George area a destination for mountain bikers all over the world. IMBA requests that the current trails system is maintained under the new plan. IMBA would encourage the continued development of new trails and the designation of social trails where the bio/ecological conditions and the identified resource values would allow. Of particular concern are the social networks of trails that have developed in the urban interface areas, such as Dalton Wash area. By taking a more active development approach in the areas where social trail networks are developing BLM can provide sustainable trails that connect to urban centers and avoid the negative effects of user created trail systems.

Comment: 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.

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: 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: 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: 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: Please manage Water and Short Canyons on the south side of Canaan Mountain for motorized use. These canyons are proposed for wilderness in ARROW 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: Third, if you would like to see what the Ranger Bart Trail would look like in just a few years, drive down the south end of River Road and see the scarred landscape, which is viewed behind the "Closed to Off Road Vehicle" signs.

Comment: One of the top items for my wife and myself about moving to Sun River was the access to the Ranger Bart Trail. Having a quiet walking trail with such easy access was very important to us. When we first used it we were so impressed with the silence

and serenity along with all the history of Native American ruins. We could walk for miles on the trail with only the sound of water to keep us company. In the last year we have noticed more and more ATVs and motorcycles that are leaving trash, destroying the landscape, and of course the worse for us is the noise. We respectfully request that the BLM declare this area off limits to motorized vehicles.

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 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 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: here is one route I was not sure you had included in you inventory. I will submit this with my comments. We have used this extensively over the years with Search and Rescue as well as recreation. This area at one time was open travel, then change to existing routes. Google Earth FILE ATTACHED

Comment: Please consider your out-of-state mountain bike visitors and keep the trails in Washington County designated as mountain bike trails.

Comment: As a citizen of Utah I demand that you keep ALL areas OPEN when revising the travel management plan. Keep them ALL open.

And if you decide to go against the will of the people and do close some riding areas, I fully expect that you will open an equal amount of riding area in a presently closed, but different, location.

Point being, it is unacceptable for there to be less riding areas AFTER July 19th than there is before it. Don't close any riding areas or trails!

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: First the Spring Creek Canyon area, your WSA just south of Kanarraville- Regardless what happens as far as wilderness, the existing dirt road into the lower canyon should be physically closed now. I have observed numerous incidents of graffiti on the walls of the canyon and attempts to dam the

stream by people. Moving the access physically down to the mouth of the canyon, adding an hour to the walk to the narrows area, where these activities occur, will help stop this.

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: 1. Transportation. The county road, known as 'Babylon Road', should be preserved to become a future transportation corridor connecting the Town of Leeds and the City of Hurricane. Establishing a minimum 66' wide public right-of-way, with the ability to improve the corridor to modern traffic standards, will ensure access to recreational opportunities within the NCA and establish circulation between Leeds and Hurricane. Enhanced connectivity between Leeds and Hurricane will have a positive influence on the economic development of both communities. Similar to the Red Hills Parkway, which traverses the Red Cliffs Desert Preserve in St. George, this arterial corridor need not be anything more than a two-lane route (with a potential adjacent ATV trail) connecting two communities and providing access to recreational amenities.

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

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: III. 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 as 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: 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: 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: 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: L. Connectivity

Routes connected to the AZ Strip should be kept open. If any decision affects the ability to connect to adjacent management areas must be disclosed in the EIS and EA.

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: 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: 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 routes 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: We support the High Desert Trail Systems, and would comment that it should connect to the Silver State Off-Highway Trail Systems in Lincoln County, Nevada, and Mojave County, Arizona. We support a motorized connection to Scarecrow Peak in the Beaver Dam Wash National Conservation Area. Our preference is that the trail be designated through Cougar Canyon, or Slaughter Creek. Leave the current "open" designation to be included in the trail system.

Comment: We do NOT support being presented with various Alternatives in our choices when 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. The agency must develop a wide range of Alternatives, including an Alternative that enhances motorized and mountain bike trail-based recreation. Motorized recreational opportunities have been reduced throughout the region. Additional future closures can be expected on the Arizona Strip. The amount of closures has reached a critical mass. Recent planning efforts in all management areas surrounding the planning area have closed thousands of miles of roads and trails. There should be plans that include future recreation opportunities. Plans for "tomorrow" and not just for now should be incorporated into the decision making process.

Comment: High Desert ATV Trail

All routes shown on the BLM's inventory map should remain open. Roads that are used by full size vehicles that are designated as ATV routes for the High Desert Trail system should remain open to all OHV's. We oppose closing off any roads to full size vehicles except under special circumstances i.e. too narrow or not previously used by full sized.

4. Ash Creek

We encourage keeping the old washed out road that popular with users of highly modified 4x4's "buggies" as a technical challenge trail. Having these types of difficult trails in suitable locations where they do not damage resources give users of these type vehicles a suitable place to recreate and not have to use more sensitive areas.

Comment: We have also enjoyed riding in the Vermillion Cliffs, Grafton, Elephant Butte, Coral Pink Dunes, the Arizona Strip area and have ventured as far south as the area around Mt. Trumble, Whitmore and the north rim of the Grand Canyon.

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 ACES. 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: High Desert ATV Trail

All routes shown on the BLM's inventory map should remain open. Roads that are used by full size vehicles that are designated as ATV routes for the High Desert Trail system should remain open to all OHV's. Existing routes county wide should be acknowledged and taken into consideration for either open or closed status. The premise of closed unless posted open should be excluded from this RMP. It is not feasible to post every route considered open in Washington County, this is a logistical and impractical approach. Not to mention when the sign is destroyed or removed on a route, the route would then be considered closed. Closure of any route or trail in this RMP should be looked at from an enforcement point of view as well as environmental. If a closure cannot be effectively enforced it should not be considered for closure, it does not make sense to close existing routes, but construction of new routes should be discouraged.

4: Ash Creek Road

This is the original road to Cedar City. It is popular with users of highly modified 4x4's "buggies" as a technical challenge trail, it is also used by many on ATVs and motorcycles. Having these types of difficult trails in suitable locations where they do not damage the surroundings give users of these type vehicles a suitable place to recreate and not use more sensitive areas.

5. China Town

The China Town trail dropping from Highway 9 at GPS 37.207210° -113.240141° and ending 37.200012° -113.248544° gives a scenic and unique recreation opportunity. Although this area and road see lots of use it has had very little environmental damage. Signs of La Verkin City remind people that dumping carries a stiff fine has alleviated dumping for the most part. Many clean ups and self management by user groups have eliminated abuse. This whole area includes the Hurricane Canal trail and several biking routes. Many are a total blast on a mtn Bike. The area from the town of Virgin west to Hurricane and North across Highway 9 should be considered for travel on existing routes. This to extend as far north as the Black Ridge wilderness area, and the road going to Toquerville falls. Many trails exist in this area and also has little or no abuse. Much of this area is very rugged as so abuse by motorized recreation would be some what limited. This area includes routes including, La Verkin Twist, both upper and lower and La Verkin Creek trail. This area where it is close to town is a popular spot for Mtn Bikes, ATVs, Equestrian and hiking. Yet unlike comparable areas for example Stucki Springs near Santa Clara. This area has had little dumping, possible because of the access to a shooting range and a dumpster on site. I would hate to see existing routes close to town be closed and put the pressures from that closure on another area. This is a great area for a quick after work recreation spot. Also having a shooting range has drastically cut back on surrounding areas being a dumping ground, like Stucki Springs and the Arizona strip. Manage the existing shooting range as open and self managed as it has been for thirty or more years.

6. Babylon Area

The area in concern extends from Highway 17 in Toquerville to I-15 near Leeds. Starting South near the Virgin river (Babylon Mills) and extending North to Anderson Junction on I-15. Some of this area is Red Cliffs desert reserve and has limited access by motorized means. I believe this area is also a unique area and offers an area that should be limited to existing trails and routes. It should have an extensive inventory. The road dropping from above the Virgin River in Hurricane GPS 37.188315° -113.357611° should be considered open to connect to the road from Babylon Mills to Leeds. From Leeds you can take the Danish Ranch Road and ride to St George, Dammeron Valley, Diamond Valley etc..... Also in this area there is opportunity for future infrastructure for a highway leading from the previous GPS coordinates to the north Leeds exit. This to Access I-15 and make a critical connector route. This area in the future will have much water development by the Water Conservancy District. I would like to point out that the China Town and Babylon Area could be similar to the Hog Canyon Trail System near Kanab Utah. These areas are similar and with proper signs maps could be used as part of the High Desert Trail System. Being close to town would help with management and enforcement issues and make this both a great motorized and non motorized recreation area. Again I would mention the local clubs would help implement and do remediation work on any of the areas of concern. Instead of closing areas such as this close to town and having the enforcement nightmare I believe they could be managed as multiple use.

7. Little Creek

Little Creek mountain is an area of ACEC. There are many ATV and Mtn bike routes, many are not designated or considered open for travel. An extensive inventory of this area to include Mtn Bike and ATV routes need to be considered. Working with the user groups extensively would help to include routes and minimize frustration and abuse by designating existing routes. We would still be able to protect those areas of concern and have a responsible recreation area. Also leaving the top of Little Creek Mountain is the Burma Trail road. Beginning of the road on top is at 37.093659° -113.188330°. This is a great route and has been included on the permit for the Tri State ATV jamboree for several years. This route needs to be maintained as open.

8. Gooseberry Mesa

This has been a great area for both motorized and non motorized, I would like to see this maintained as is in it's current State.

9. Caanan Mtn

Caanan Mountain always seems to be a topic of passionate discussion. Notice on every BLM map in existence your acknowledgement that the Caanan Mountain Sawmill Road exists. There are many Wilderness areas that have Cherry Stem roads into them. I have personally used Caanan Mtn Sawmill road in the past for Search and Rescue mission's. Many lives would have been lost over the years had this road not been available or didn't exist. I believe it is a historic and unique route that was left out of the Washington County Land Use Bill. It has been used extensively for decades, both for recreation and commercial use. I understand that little to nothing could be done to remedy this issue, other than through the courts or by legislation. However I feel it the BLM's responsibility to pressure the Secretary of Interior to check into the issues and controversy over the Caanan Mountain Sawmill Road. It needs to be brought to a resolution and obviously closure doesn't seem to be an option. These disputes should be resolved as part of the RMP. This road is still used by thousands of people each year. Is it not ironic it's call Sawmill Springs. In existence on the mountain is the original sawmill, the log drop and several man made items. The routes on Caanan mtn could be managed and designated, and be used respectfully. Many users over the years have abused certain areas on top of Caanan mtn. This would be alleviated by designating routes, and managing as it has been used for decades.

10. West Desert

Routes on the West Desert should only be limited to existing routes and no closures of routes should be considered. Many areas could be maintained as loop routes and an extensive network of trails could be maintained. An area with great recreation opportunity with good mapping and trail signs. Another area similar to the Hog Canyon trail system.

11. Steep Trail

Steep Trail is in the Elephant Cove road area and drops from the main route across the river and ties into the Poverty Road. This is a connector route that until recently has been open for travel. I know in the past people have used the river as a route. This should not be allowed, however closing steep trail suddenly makes the Poverty road a dead end at the river. The Elephant Gap Area from the State line to Mount Carmel should be on existing routes only and instead of the mass closure of routes, as seems to have been going on more all the time out there. The area behind the WSA signs are generally respected. This area needs extensive inventory and GPS work to find illegal and redundant routes and make it an area of responsible motorized recreation. After conversation with your officers they would agree that very little abuse takes place in this area in comparison to abuse taking place in the areas closer to town. However if an area close to town is closed to motorized recreation the pressure of that closure would reflect an increase use and possibly abuse on more pristine and unique areas like Elephant Gap and other areas that have been historically used responsible.

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: 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: Because of the significant cumulative effect of motorized closures at this point in time, we feel strongly that there can be “no net loss” of motorized recreational opportunities with the St. George Field Office Travel Management Plan. We would ask that this project address the attached checklist of issues and address the goals and needs identified. Using this checklist will help identify and address concerns and, hopefully, the needs of the public will be adequately met by implementing a more reasonable multiple-use alternative.

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 RMP amendment should evaluate designations for motorized off-highway vehicle (OHV) travel and the need for revisions in this area. Specifically, the issue of unnecessary and undue degradation from any designation other than “closed” must be addressed. Little or no motorized use was made of the canyon south of Dammeron Valley prior to the changes listed above. Indeed, until the BLM undertook the

fuel reduction program, the canyon was relatively inaccessible to motorized vehicles, in particular standard motor vehicles. The access of the area by large equipment used for shredding juniper and pinyon trees resulted in the creation of an apparent two track road of substantial dimension, replacing the narrow foot/equestrian trail that had existed before. The fencing of the wilderness, apparently intended to terminate at the vicinity of the area where the wash turns northward (see attached graphic marking “area of fuels reduction track”), will tend to funnel unauthorized motorized use into the canyon on the degraded area created by the fuel reduction equipment. On the other hand, if the area is designated closed and properly protected from unauthorized use, the area will largely reclaim over time, at least within the ordinary high water mark of the wash. Accordingly, the potential for additional unnecessary and undue degradation and the management option that would prevent this effect must be addressed. Likewise, the Comprehensive Travel and Transportation Management Plan should address the impacts of allowing this “route” to remain in this area. While the area in question may not include specifically identified sensitive natural and cultural resources, it does have important public land values. The wash itself drains into the Sand Cove drainage, including the upper and lower Sand Cove Reservoirs. The damage to these reservoirs from erosion that would be caused by continual disturbance of the wash should be considered and prevented. The BLM has currently provided route inventory data showing a travel way through this wash, but it must be recognized that the only basis for this route to show up was the tracks created by the fuel reduction equipment. Accordingly, an issue to be addressed is the need for this “route” to be removed from the inventory to avoid further degradation to the wash. The “route” is not important for access to any facility nor do recreationists have a reasonable expectation of use of the area other than on foot or horseback, since motorized uses have not been made of this area in the past. The Rocky Mountain power line access did not utilize this portion of the wash (approximately shown by the blue line on the attached graphic). Indeed there is no legitimate access provided to the area from highway 18, although vehicles can physically access the wash by driving off the shoulder of the highway down a fairly steep embankment. The “route” created by the fuel shredding equipment has the potential to create impacts to sensitive natural resources in the canyon if further encroachment is not precluded. The resources of this area should be protected from unnecessary and undue degradation to ensure that over time, the desired future conditions include the restoration to the natural habitat and state prior to the BLM fuel reduction program. Given that the BLM created the “route” in the canyon, no alternative should be considered that would allow further degradation as a result of access by motorized vehicles.

Comment: Hurricane City sees the need to provide a north/south transportation link between its City limits along the Virgin River and the 1-15 interchange at Leeds. A primitive road already exists along this alignment and the future possibility of an improved road through the Conservation Area should not be ruled out. Providing multiple transportation routes is one way of preventing gridlock and associated air pollution.

We believe that comments made by local agencies should be given more weight in the review process than comments received from groups and individuals not immediately impacted by the final plan.

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: I would like to see: maintenance of existing trails; designated mtn. bike use; new trail development, particularly connecting the Joshua Tree road with trails lower/eastward such as Stucki or Bear Claw Poppy.

Comment: A single track connecting the Rim Runner/Barrel Roll area to Stucki would be fantastic. A single track trail connecting the Green Valley area to Barrel Roll/Rim Runner area would be fantastic.

Comment: Enhance mountain bike system by designating Rockville Bench, Little Creek & Dalton Wash trails.

Comment: I love to ride these mountain bike trails: Thundermountain, Bearclaw Poppy, Anasazi, Upper Graveyard and the other trails around that part. Snow Canyon, Rim runner, Paradise, Barrel Cacti, Barrel roll, Death fingers, Red Mt. Zen trail. I like to race at Green Valley and other places and I want more trails in St. George.

Comment: Please keep and maintain the single track bike trails open. I enjoy the ATV specific trails but don't want to see them merge.

Comment: Bear Claw Poppy, Stucki Springs, Barrel Roll, Sidewinder, Rim Runner, Hurricane Rim, Gould, JEM, Gooseberry, Little Creek. These are trails I ride frequently, I would like to see these trails maintained, extended and protected from motorized vehicles and equestrian use.

Comment: Please get on the stick with Little Creek Mesa, it should've been done years ago. Please designate Guacamole, Rockville Bench and Zen. See Map 2.

Comment: I always wondered why the development was stopped on Frog Hollow. I am an avid road & mtn. biker and love the Goose, JEM & Little Creek trails. It was such a disappointment when I found out that Frog Hollow was started & then stopped. From my experience of riding these trails I have found that there are tons of people riding them also. So much so that the trail can seem over populated, causing bikes to stop & let other bikers pass. With so much land available, and so many local riders & even more traveling visitors who come just to mountain bike. It would be so great to have more trails to ride.

Comment: Map 2 - Trail by Smith Mesa remain open to OHV: Map 2 - Ash Creek old Hwy creek bed open to OHV.

Comment: As a visitor to parks in Washington & Iron County people dump unwanted items & dead animals on the land. People shoot out signs & show little respect to property. I feel we need designated trails to 4-wheelers, better watch of people destroying property.

Comment: Gem - Hurricane - Gould's please no horses or ATV's; Stucci Springs please no horses or ATV's

Comment: Please protect the following: Map #1 - Rockville Bench Area - Mtn. biking & Hiking trail; Map #1 - Little Creek Mesa trail (Steve Walters) mtn. bike trail; Map #1 - WD Staging Area/Sand Hollow Area - 4WD & motorbike use; Map #1 - Nick Paitos/4WD/ATV/Jeep trails; Map #1 - Ash Creek/4WD Jeep trail/Steve Crabtree; Map #1 - Canaan Mtn. rt to Sawmill should be Jeep trail

Comment: ATV users have been smart to identify the ATV routes as trails. These routes are roads and should be treated as such by land managers. ATV trails should be subject to the same regulations as new roads. Vehicles that carry 4 people are hardly ones that travel on trails.

Comment: Please protect the following trails for mountain biking and hiking only: JEM, Hurricane Rim, Barrel Rolls, Sidewinder, Rim Rock, Rim Reaper, Gooseberry, Bear Claw Poppy trail, Stucki Springs, ZEN, Barrels, Green Valley Raceway, Little Creek, Rockville Swamp

Comment: On Map 1 6/14/2010 under initials S.C.C. I would propose to keep Ash Creek Trail open. It is a great sought after 4x4 trail.

Comment: Map 1, I would propose to keep Ash Creek trail open. It is a great sought after 4x4 trail.

Comment: Map 2 6/14/10 - Trail by Smiths Mesa; Ash Creek to remain open

Comment: 1. Route Inventory: Many primitive roads but too few non-motorized trails. 2. Why not marks all the "OPEN" to ORV/motorized trails - and then we know that any unmarked trails are closed? Seems logical. Then ORV users will not damage fragile lands by mistake. They will be confident they are in compliance.

Comment: 5. ORV/ATV use creates roads! Please don't call them "trails."

Comment: Please protect the following as hiking/bike trails: Little Creek Mesa, North & South; Guacamole; Swamp Trail (Rockville Bench); JEM Trail; Gould's Wash; Santa Clara trail system - Sidewinder - Rim Rock - Rim Reaper - Zen trail - Barrel trail - Broken Mesh; Barrel Rolls trail; Green Valley Loop; Stucki Springs

Comment: Non-Motorized Please: Little Creek Mesa North; Little Creek Mesa South; Guacamole (Dalton Wash); Swamp Trail (Rockville Bench); JEM Trail; Gould's Wash; Church Rock; Sidewinder; Paradise Rim; Rim Rock; Rim Reaper; Zen Trail; Barrel Trail; Broken Mesa; Prospector Trail; Barrel Rolls Trail; Green Valley Loop (Bear Claw Poppy); Stucki Springs

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: 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: 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: As discussed above, FLPMA mandates that BLM prevent "unnecessary and undue degradation" of the lands it manages and also prevent "permanent impairment of the productivity of the land or quality of the environment." 43 U.S.C. § 1702(c); 43 U.S.C. § 1732(b). In addition, BLM's regulations emphasize the importance of minimizing conflicts among various users and uses of public lands as well as minimizing damage to the environment, wildlife, and habitat. 43 C.F.R. § 8340.0-2,

8342.1(a), (b); BLM Manual 8340 – Off-Road Vehicles (General) (1982). The St. George field office must abide by these mandates when developing its TMP, NCA plans, and RMP Amendment. In fact, BLM must close routes to ORVs if use is causing or will cause considerable adverse effects upon soil, vegetation, wildlife, wildlife habitat, cultural resources, historical resources, threatened or endangered species, wilderness suitability . . . or other resources until the adverse effects are eliminated and measures implemented to prevent recurrence.”

BLM must take care not to duplicate the errors of other BLM field offices by designating excessive routes such that the entire field office becomes laced with an unmanageable ORV system that does little to minimize conflicts. To avoid this trap, each route designated must serve an identifiable and compelling purpose that is explained in the TMP and RMP Amendment. The TMP must also explain to the public how the route designations and any “open areas” will minimize conflicts with other users of the public lands, specifically non-motorized recreationists. BLM must not designate excessive, ecologically-damaging, or duplicative routes that result in impacts to nonmotorized users and damage to the resources BLM is charged with protecting. The “close unless posted open” policy will also assist BLM in enforcing its route designations because ORV users will not likely be tempted to remove “open” signs.

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: The TMP must also include evidence and analysis showing that the route designation decisions will minimize impacts to and protect water quality, sensitive soils, and biological soil crusts in Washington County. The TMP and RMP Amendment should include a map that shows route designations on the same map with riparian areas, open water, wildlife habitat, biological soil crusts, and highly erodible soils. In designating ORV routes, BLM should consider scientific studies that show that ORV use significantly weakens soil stability and results in soils that are highly susceptible to wind erosion.

Comment: Likewise, the TMP and RMP Amendment must include analysis and evidence that its ORV use areas and route designations will minimize impacts to vegetation, including special status plant species, of which there are multitudes in Washington County.

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.⁷ 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 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: The TMP should also include a cumulative impact analysis to address how other uses of the public lands, notably grazing, when viewed in conjunction with designated routes, will impact air quality, water quality, wildlife habitat, wilderness values, and other resources in the region.

Comment: Specifically, BLM should not designate the route that extends into the northeast corner of the Red Mountain wilderness area. This faint route is the only route cherry stemmed into the wilderness area and is incompatible with the wilderness values and the purpose and need for which the area was designated wilderness. BLM should likewise not designate the route that extends into the northeast corner of Canaan Mountain Wilderness because it is similarly incompatible with the wilderness values of the area and the purpose and need for which the area was designated wilderness. The canyons on the south side of Canaan Mountain, while not included in the wilderness area, should be managed for non-motorized use. ORV use in these canyons is inappropriate because they retain wilderness characteristics, have riparian values, and provide important habitat for many species.

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: At the outset, we recommend that BLM only designate one singular trail known as the High Desert Trail in the planning area rather than a system or network of trails for this purpose. This will make it clear to users where the trail goes and will give those who endeavor to ride the entire trail the satisfaction of completion without having to ride on every spur route that would be in a system or network. That is not to say that other routes for ORV use could not connect to the High Desert Trail; however, there should only be one linear feature from destination to destination known as the High Desert Trail. Locating any part of the Trail within or through the Beaver Dam Wash NCA is inappropriate and not in the spirit of the values for which Congress designated the NCA.

We highly recommend that BLM choose one of these three routes.

- 1 – Beaver Dam Wash Alternative
- 2 – Motoqua Alternative
- 3 – Scarecrow Peak Alternative

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 use the information provided in Appendix 1 to measure habitat fragmentation, conduct a thorough fragmentation analysis, and inform decisions regarding road closure and other limitations on use in the TMP.

Comment: BLM should follow the eight travel planning principles detailed above to ensure that only routes which truly serve a valid purpose for the public remain open. BLM should also create comprehensive travel and recreation management goals and designate routes accordingly.

BLM should use the information provided in Appendix 1 to measure habitat fragmentation, conduct a thorough fragmentation analysis, and inform decisions regarding road closure and other limitations on use in the TMP.

Comment: In order to fulfill the requirements of the Omnibus, the BLM should consider identifying the expanded Red Hills Parkway as the potential Northern Transportation Corridor. The BLM should not include an alternative that considers a new route through the Red Cliffs NCA, which would violate the management direction in the Omnibus and the HCP.

Comment: We have identified, in order of preference, three alternative routes that meet all of the standards of the legislation and that will minimize conflicts with resources and other users while providing riders with a satisfactory experience. We highly recommend that BLM choose one of these three routes.

1 – Beaver Dam Wash Alternative

2 – Motoqua Alternative

3 – Scarecrow Peak Alternative

Comment: Regarding the proposed 'northern transportation route' - we oppose any route that goes through the center of the Red Cliffs Desert Reserve. That area is a prime area of beautiful riding trails and our primary riding area during winter months. If such a route must be identified, it should be along the current Red Hills Parkway.

Comment: Gooseberry Mesa: Although this mesa currently has a National Bicycle area, this mesa is so huge, that it is ripe for equestrian trails in areas that are not currently developed for bicycles. We support the other user groups in suggesting that this area become an SMRA.

Comment: Another of these areas is north of the Red Mountain wilderness and on the east side of Route 18. This area stretches all the way from the Red Cliffs National Conservation area to the Dixie National Forest. This area is used extensively by residents of Dammeron Valley, Diamond Valley and Winchester Hills - all equestrian communities. And while the existing roads are open to motorized as well, we simply want to continue to enjoy, and have unlimited access to this area.

Dammeron Valley residents have expressed concern about the area which appears to be between the north boundary of the Red Mountain wilderness area and Dammeron Valley on the west side of Route 18. This area goes east-west under the power lines and can be accessed by trucks and ATVs from Route 18. (On the road, this is the far northern end of the chipped area and south of the power station). There has been

some trash dumping and former trails are now wider to accommodate the motorized vehicles. While we see that access on the existing frontage road from the Red Mountain trailhead (which goes to this east-west route) will be limited by a gate, we are concerned that the wilderness area may be breached by motorized from the north due to this access. We hope that you will look at this area carefully and prevent access from that route.

Comment: Per our conversations at the open house, we will be electronically submitting maps of the many trails that we ride.

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: I live in Sun River, a part of St. George, and was very pleased when the trail starting near the Virgin River and running south towards the Arizona border was improved and named in honor of the well known local historian and hike leader, Bart Anderson. It provides some good views as well as quiet and a variety of wildflowers and other flora and the ups and downs of the trail are such that older people like me (soon to be 90 years old) can enjoy hiking it. To protect these qualities I urge the BLM to establish the surrounding area on its side of the Virgin River to at least the Arizona border as a Special Recreation Management Area where ATV's and other motorized vehicles are excluded. Destruction of this area such as has been done by motorized vehicles both north and east of Sun River would be a very great loss.

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. We use ATVs to access established high points in the "open" area to get cell phone reception from Utah Hill; this is vitally important communications and public safety. Eventually, the property will require a utility corridor to connect to utilities, along established roads to the Goldstrike property.

Comment: 5. Travel and Transportation Management plan (Travel plan)

A. Placement and Design of Staging Areas

Use of the Built Image Guide for the National Forest is recommended for all visitor facilities (until such time as the BLM Built Image Guide is adopted into BLM policy). of particular concern is that BLM trailheads for OHV's be located near the Urban interface and utilize specific design guidelines for large vehicles and trailers. Backcountry and primitive Zone staging areas for OHVs should be accompanied by supplemental facilities such as designated primitive camping and open areas for youth and play. OHV staging areas may need additional administrative controls such as fencing, user etiquette signage, and use limits. CDF recommends that all staging areas for OHV's only be located in Zones 3 and 4 of our Travel and Transportation Plan (see map Exhibit "A"), and further that staging in Zone 4 be limited and highly regulated or monitored.

Comment: The Travel Plan should include:

1. BLM must assess the baseline of existing routes based on 1999 or prior aerial photography and current BLM inventories.
2. Only those additional routes created through the NEPA process after 1999 should be considered in the official inventory of trails.
3. Any other route not Part of the official route inventory should be considered through this process as a new route added to the System.
4. Travel routes on BLM land should be marked open. If the road is not marked open it would be closed. The advantage of this approach is people would more likely stay on the road and establishes an open road system and the public is less likely to take down the closed signs.
5. In Off-Highway Vehicle (OHV) route selection BLM should use science to designate travel routes to improve the health of the landscape; the Travel plan must prioritize protection of the ecological values of the county rather than simply labeling the majority of the county as limited to designated roads. wildlife habitat, soil and watersheds as well-as historic buildings and cultural resources need to be protected.
6. In sensitive wildlife areas outside of the NCAs, where OHV use is not appropriate CDF recommends only roads that meet BLM's road definition be allowed and no primitive roads or trails for motorized use because they lead to more off-road impacts.
7. The Lands Bill had provisions that all the trails have to be monitored annually. Additionally, BLM has to assess the effects of trails on wildlife and wildlife habitat, natural resources and cultural resources. BLM should carefully design the High Desert off-Highway vehicle Trail to avoid important natural areas and to prevent illegal off-trail impacts. The Lands Bill also requires that only OHV trails already designated as OHV trails at the signing of the bill are to be used for the High Desert Off-Highway Vehicle Trail.
8. What are the current and future direct human impacts of outdoor recreation, parking lots, staging areas, camping and how will they be managed to protect natural resources?
9. How will BLM manage roads and trails to prevent the spread of non-native plants? inventory of roads and trails could also inventory where non-natives are colonizing and bring awareness and management to this important issue that threatens the health of BLM land. Add Arizona Strip's MA-VM-I6 on a vehicle washing protocol.
10. In this NEPA process BLM must reanalysis the multi-year Special Recreation Use permit SRP: #AZ 100 UT 100-2004-006R to the Tri-State ATV Club for their annual ATV jamboree and its cumulative impacts of large groups of ATVs on the environment from the popular event now and in future years as well as the annual Rhino Rally motorcycle event. BLM has to re-evaluate the ATV impact to the Fort pierce ACEC and Little Creek Mountain ACEC.
11. In this process BLM should reevaluate approved ATV trails given a categorical exclusion in the past.
12. Specifically the legislation has tasked the BLM to complete a Travel Management plan. The touring cyclist is being left out of the transportation planning and should be included. Roads intersect BLM land throughout Washington County and it must be the BLM that engages state and local governments to create a passage through the county for touring cyclists. The Federal Department of Transportation completed a Draft Strategic Plan this year which includes the directive for other Federal Agencies to "Focus on Bicyclists" in its improved Safety for all Road users. BLM should work cooperatively with

UDOT and other state agencies to identify scenic backway/byways, highways and dirt roads for nomination as a part of the US Bike Route System. These designations foster safety and signage improvements for touring cyclist. The American League of Bicyclists (www.bikeleague.org), Adventure Cyclists (www.adventurecycling.org), and Utah Trails and Pathways Program all have great resources and grants to help with this. BLM could be a "planning partner" in these efforts. Potential routes should be identified during this planning process.

13. BLM must consider trails and areas for quiet recreational experiences; "Statewide user surveys by Utah Department of Natural Resources also reveal that despite the increase in recreation users, widespread desire exists for more quiet and seclusion in outdoor settings". Natural quiet and beauty of the public lands are without question what most people seek when visiting public lands. BLM should balance motorized and non-motorized areas and trails.

14. There is a great need to provide sufficient opportunities and areas for quiet, non-motorized recreation experiences to protect wildlife, wildlife corridors and water quality.

15. In route selection according to BLM's OHV regulations all roads and trails must be located to minimize:

i. Damage to soil, watershed, vegetation and air

ii. Harassment of wildlife or significant disruption of their habitat

iii. Conflicts between off-road vehicle use and other existing or proposed recreation uses of the same or neighboring public lands, and to ensure the compatibility of such uses with existing conditions in populated areas, taking into account noise and other factors.

APPENDIX B — PRESS

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. 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

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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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6/23/2010

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Page 1 of 2



Public provides input

BY DAVID DEMILLE • 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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Page 2 of 2



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.

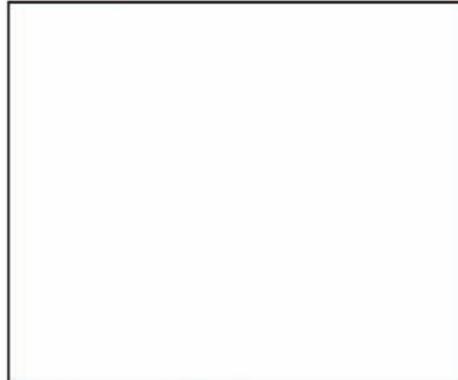
The BLM has three more meetings scheduled this week, with the comment period for this phase in the implementation process to last until July 19.



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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, 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 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 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.

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APPENDIX C — 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



BLM

St. George Field Offices



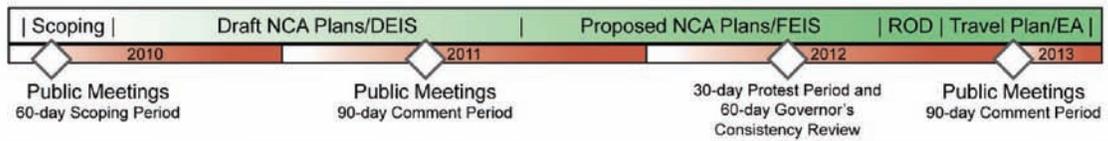
Amendment of the St. George Field Office 1999 Resource Management Plan

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.

Opportunities for Public Input





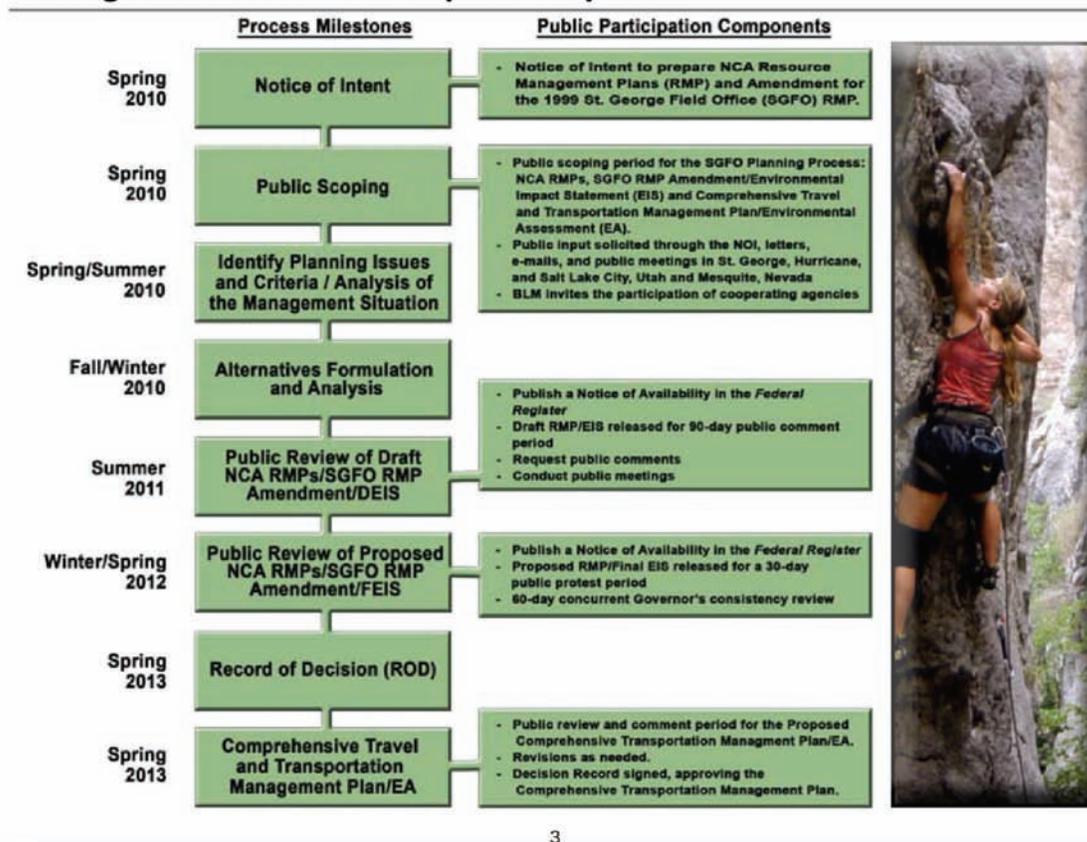
Comprehensive Travel and Transportation Plan/Environmental Assessment

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

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St. George Field Office
345 East Riverside Drive
St. George, Utah 84790

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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

<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 D—SCOPING MEETING DISPLAY BOARDS



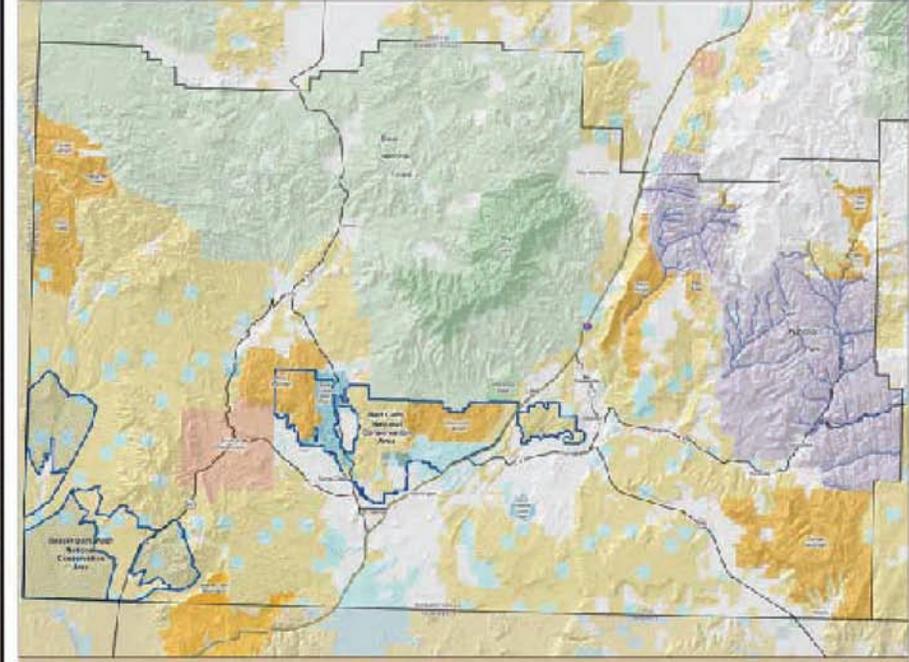
St. George Field Office Planning Process

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 Road/Trail
Indian Reservation	National Park System (NPS)	Private Land	PWA and Basin Floor

This map was prepared by the St. George Field Office and is intended for informational purposes only. It does not constitute a final decision or approval of any project. For more information, contact the St. George Field Office at (435) 734-2000.

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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

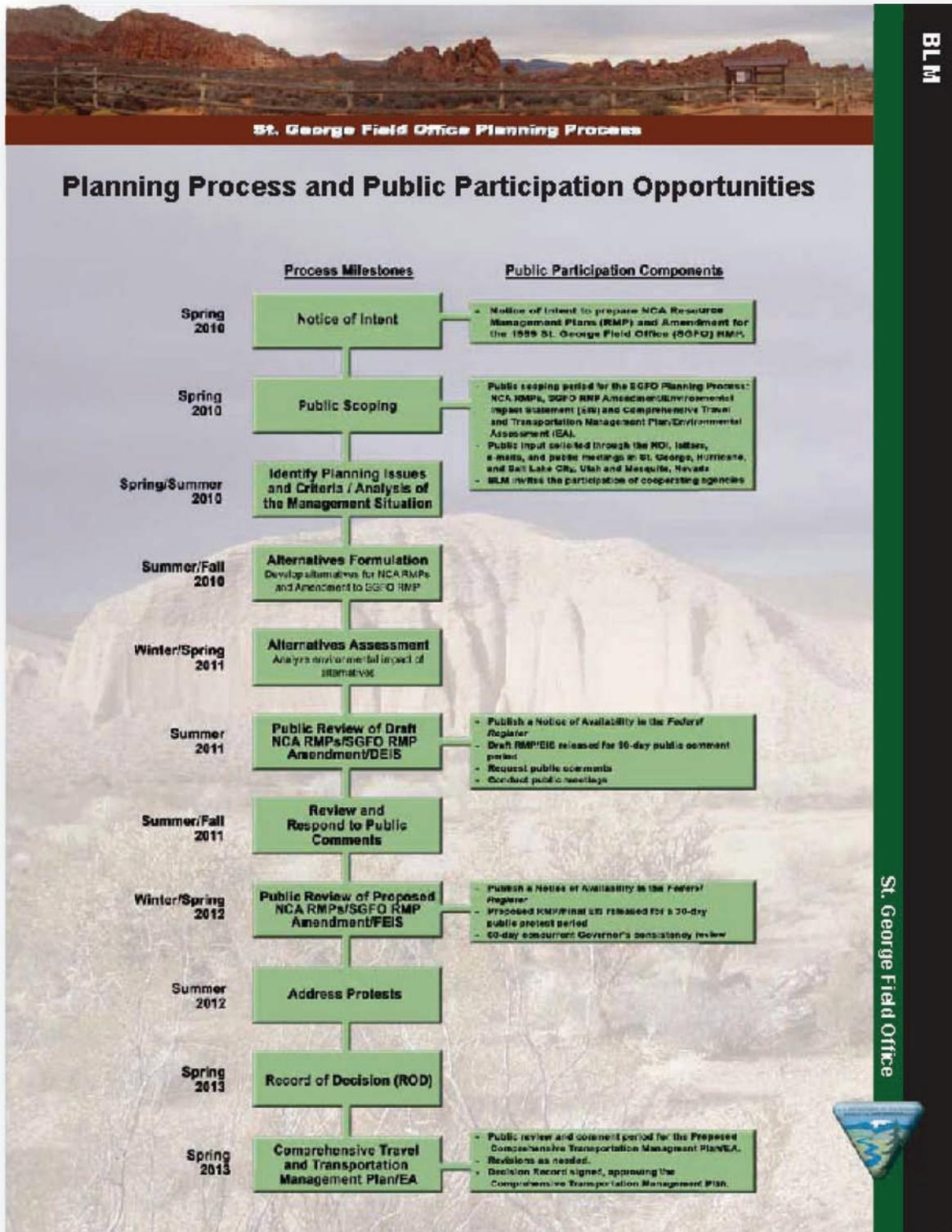
Planning Issues

- 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





BLM

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.

Bureau of Land Management - Existing Off-Highway Vehicle Designations St. George Field Office

■ Open to Cross-Country Travel ■ Limited to Designated Roads and Trails
■ Closed to Motorized Vehicles

St. George Field Office



St. George Field Office Travel Management Planning Process

Comprehensive Travel and Transportation Management Plan

The Omnibus Public Land Management Act of 2009 directs BLM's St. George Field Office (SGFO) to complete a Comprehensive Travel and Transportation Management Plan for public lands in Washington County within three years.

What is a Comprehensive Travel and Transportation Management Plan?

A travel management plan is a comprehensive analysis of the access needs of all public land users. Access needs are evaluated in conjunction with the BLM's legal mandate to protect natural and cultural resources on public lands. Individual route evaluations and designations that are included in the SGFO Comprehensive Travel and Transportation Management Plan will be analyzed in an Environmental Assessment (EA). Based on this comprehensive analysis, every route on BLM-managed lands will receive one of the following designations:

- **Open:** Route is open for use by the public.
- **Limited:** Travel on this route is limited to the public in some form (seasonal restriction, administrative access, vehicle width restriction, non-motorized use, etc.).
- **Closed:** Route is closed to one or more uses.

Who are public lands users?

Travel management planning takes a comprehensive look at the access needs of a wide array of public land users. These include:

Recreational Users

This is the largest public lands user group. It includes both motorized and non-motorized users. Motorized users include full-size 4WD enthusiasts, ATV/UTV riders, and off-road motorcyclists. Non-motorized users include equestrians, mountain bikers, hikers, hunters, and rock climbers.

Commercial Users

This user group depends on access to public lands for their livelihood. It includes oil and gas companies, mining companies, livestock grazing permittees, commercial seed harvesters, and outfitters who offer a wide variety of guiding services for all forms of motorized and non-motorized recreation.

Competitive and Organized Group Events

A wide variety of competitive and group events take place on public lands every year. The BLM issues permits for off-road motorcycle races, 4WD group events, ATV group events, mountain bike races, running races, adventure races, weddings, and family reunions.

Administrative Users

This is a diverse user group, consisting of municipal and county governments, power companies, and utility companies. They require access in order to maintain utilities that are within public lands rights-of-way.

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St. George Field Office





St. George Field Office Travel Management Planning Process

Comprehensive Travel and Transportation Management Plan

How can I provide input?

You can provide input to the travel management planning process in a variety of ways. The most important is submitting route inventory data. Here's how:

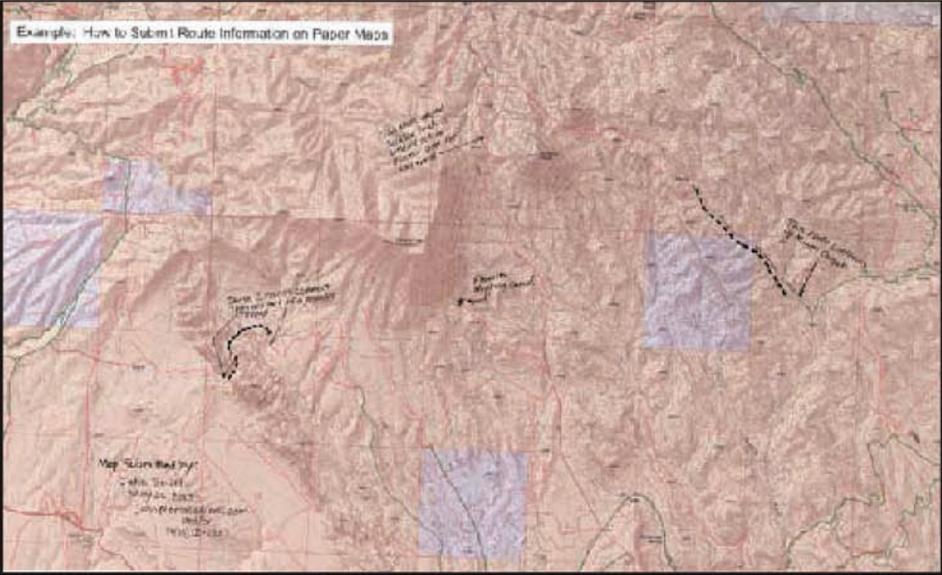
- 1) Take a close look at the maps available.
- 2) Did we miss your favorite route?
- 3) If you see a route missing, here's how to submit the information:
 - Draw the route on one of the available maps
 - Submit your own map before the scoping deadline
 - Submit Google Earth files in KML format
 - You can e-mail KML files to utsgrmp@blm.gov
 - Submit GIS data in ESRI shapefile format
 - Please include projection information with your GIS data

Is there other information that you think would be valuable?

Identifying specific routes that are important to you would be very beneficial. Identifying why they are important is also critical:

- 1) Does the route go to a specific destination, like a hunting camp or scenic overlook?
- 2) Is the route part of a favorite driving loop?
- 3) Do you use the route to access climbing or hiking areas?
- 4) Is the route a challenging ATV or 4WD route?

Example: How to Submit Route Information on Paper Maps



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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



APPENDIX E—SCOPING MEETING MATERIALS

PUBLIC MEETING SIGN-IN SHEET

Location: _____ Date: _____

Public Meeting Sign-In Sheet

for the Bureau of Land Management – St. George Field Office
NCA Plans, RMP Amendment/EIS, and Comprehensive Travel Management Plan/EA

Copies of this registration will be available for public review at the St. George BLM Field Office during regular business hours. Individuals requesting that their address be withheld from public review or from disclosure under the Freedom of Information Act must check "YES" in the "Personal Information" column. Such requests will be honored to the extent allowed by law.

Add me to the mailing list	Do you want your Personal Information withheld?	Name	Organization Representing (if applicable)	Mailing Address, City, State, Zip	Phone Number E-Mail Address
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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) 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. 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):

PUBLIC MEETING HANDOUT

Additional handouts were available at the public meetings, related to the two NCAs, Wild and Scenic Rivers, and Wilderness. Images of these can be found in the scoping report for the RMP Amendment and NCA plans.

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.



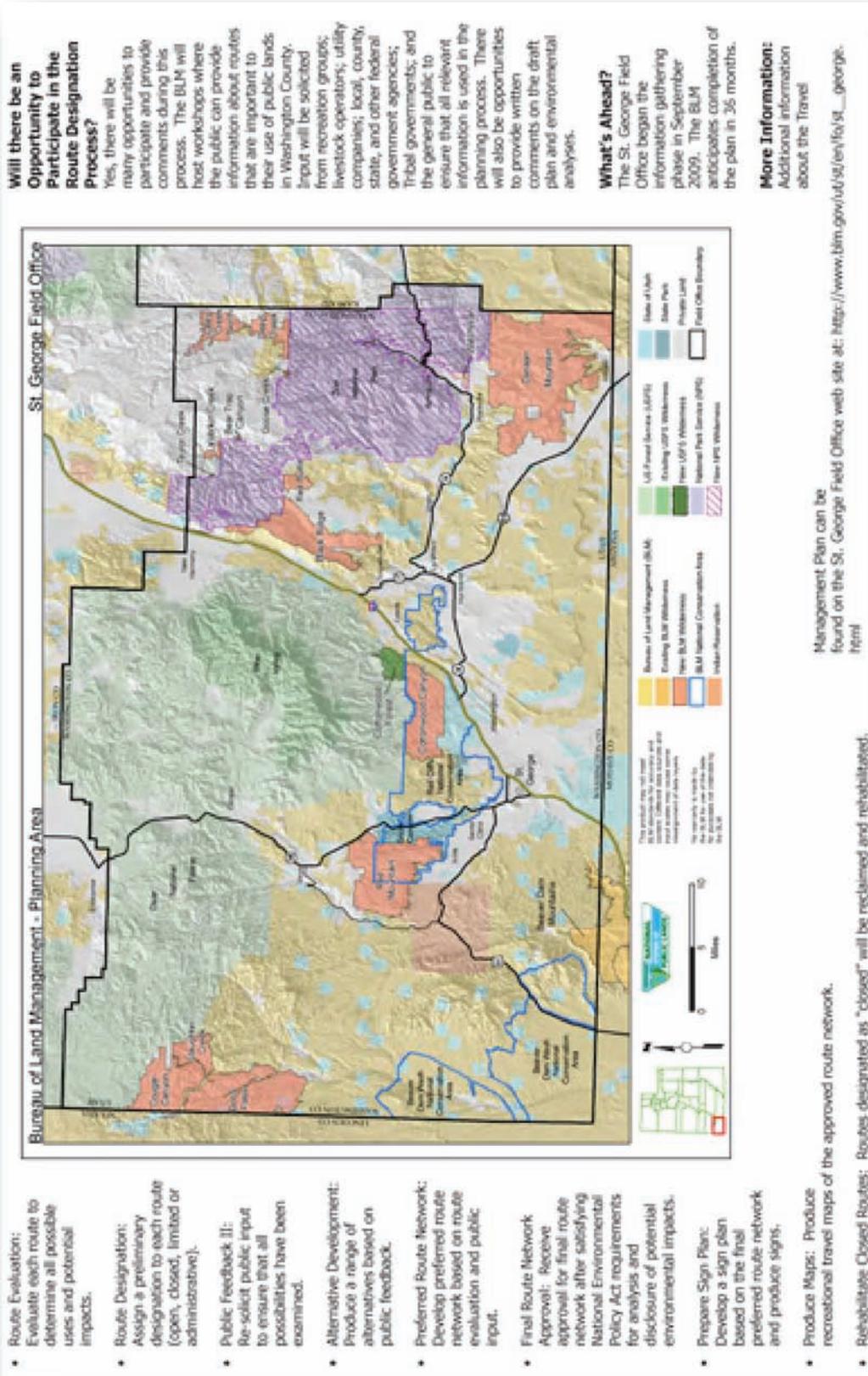
What is a Comprehensive Travel and Transportation Management Plan?
Comprehensive travel management planning addresses access needs for a wide array of public land uses including recreational, agricultural, and commercial activities. Access needs are evaluated within the context of BLM's legal mandates 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



- **Route Evaluation:** Evaluate each route to determine all possible uses and potential impacts.
- **Route Designation:** Assign a preliminary designation to each route (open, closed, limited or administrative).
- **Public Feedback II:** Re-solicit public input to ensure that all possibilities have been examined.
- **Alternative Development:** Produce a range of alternatives based on public feedback.
- **Preferred Route Network:** Develop preferred route network based on route evaluation and public input.
- **Final Route Network Approval:** Receive approval for final route network after satisfying National Environmental Policy Act requirements for analysis and disclosure of potential environmental impacts.
- **Prepare Sign Plans:** Develop a sign plan based on the final preferred route network and produce signs.
- **Produce Maps:** Produce recreational travel maps of the approved route network.
- **Rehabilitate Closed Routes:** Routes designated as "closed" will be reclaimed and rehabilitated.

APPENDIX F—THE OMNIBUS ACT (P.L. 111-11)

SUBTITLE O—WASHINGTON COUNTY, UTAH

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).

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