



June 1, 2023

Washington County Commissioners

Dear Commissioners:

I am the President of Utah Public Lands Alliance, and a resident of Virgin, Utah. I recreate often in the BLM and SITLA lands between Gooseberry Mesa and Entrada Drive in Virgin. I am very concerned that the Town of Virgin allowed a developer to close a public highway to vehicle access connecting Entrada Dr with BLM land and Sheeps Bridge Road. At their October 2022 Town Council Meeting, Virgin approved a subdivision plan allowing the developer, JBARS, to close the highways known as RS 2477 Road 0648 and 0650. The attached Access Rights article quotes "that even if abandoned by a local government entity, RS 2477 ar still public roads until abandoned by the State Department of Transportation....this makes it impossible for cities and counties to completely vacate roads created on federal lands before statehood." Utah Code Ann 872-5-305

I have been working with Laura Ault, Jake Garfield, and Assistant Attorney General Hayden Ballard from the Utah Public Lands Policy Coordinating Office about the closure. I also discussed this with Washington County Regional Tourism Regulatory Affairs Director Heath Hansen, and he suggested the next step might be to reach out to the County Commissioners.

The developer claimed that the roads are seldom used by the public, which is untrue. My property is adjacent to Road 0648 and I can testify that the road is used frequently by ATV/UTVs, Jeeps, Equestrians, Pickups, Campers, and Mountain Bikers. Frequent use is also evidenced by the multitude of vehicle tracks on the road. Both roads have also been used for access to Red Bull Rampage, an annual event which attracts thousands of enthusiasts every year into the beautiful backcountry. The roads are also frequently used as routes for both biking and running events. I, along with many other homeowners in Virgin purchased their lots to build homes in part because of the easy access to BLM.

The developer also claimed that access to the BLM land could be accessed from Sheeps Bridge Road, but that is 10 miles away over rough roads that require 4 wheel drive and high clearance, so it will severely restrict access by the current OHV, camping and biking users. Further, it will change the area from being a circuit route to just a one way in and out.

Further, these highways also provide the only alternate access to homeowners south of the Virgin River if the Camino del Rio bridge were closed for any reason.

Washington County's Resource Management Plan Land Access Plan clearly recognizes the importance of protecting RS 2477 highways. I would like for the County to contact the Town of Virgin about finding alternatives to keep these public highways accessible to the BLM lands. In addition to being afforded protection under RS 2477, the roads would also qualify for protection under Utah Code 72-5-104 as a Public Use Dedicated Road, having been in use for many decades.

I attached several resources for your information:

- A map of the area showing the RS 2477 proposed closures and the surrounding recreation area
- An excellent resource guide by the Utah Public Land Use Institute on Public Access Rights on Public Roads and Private Lands that describes RS 2477 and 72-5-104 public highway dedications.
- Excerpt from the Washington County RMP Land Access Policy
- List of endorsers that requested adding their support to this request to keep these historic highways kept open.

Thank you for your consideration, I am available at any time to discuss this matter further, or to arrange a tour of the area.

Sincerely,

*Loren Campbell*

Loren Campbell  
President, Utah Public Lands Alliance  
Virgin Resident

Attachments