

Suggested Questions for Travel Management Plan Comments



People often ask what they can say to make their comments effective, or “substantive”. Most comments do a pretty good job at telling What you want, what’s often missing is the Why which justifies your comments. There are many justifications that BLM cites for every proposed closure or restriction to access for each trail, and it is impractical for you to write meaningful comments on all of them. If everyone running a trail just picks the items most important to you from the list below and states specific reasons why the trail should remain open.

We really need your input on individual routes, we can’t get it any other way. The more detail you give the better, but even if you only write about one or two - that will make a tremendous impact in preventing BLM from making arbitrary decisions to close or restrict OHV access to that trail, and give us better grounds for legal challenges. Perhaps the most important things for recreationists to convey about a given route are its value and its manageability.

For Trail Reports, focus on the first 7 shaded items.

1. **Review the BLM Route Reports and ask questions. Cite the pages of the Route Report you are looking at. I recommend you do this not when you initially prepare your notes, but when you are ready to submit the comments to BLM. You’ll be able to access Route Reports from UPLA’s Resource Page for that TMP, a sample Route Report is attached at the end.**
 - a. Is the GPX/GIS inaccurate for this trail or ones surrounding it?
 - b. Is the Route Inventory missing an important trail?
 - c. Does the route provide connectivity to other routes?
 - d. Are any uses missing from the route inventory?
 - e. Is the Use Level accurate? Low use trails are more likely for closure
 - f. Does the route provide access to private or state lands?
 - g. Does the route provide access for grazing, permittees or other land uses?
 - h. Does elimination of the route also take out primary access to **dispersed camping**?
 - i. Does the route provide access to hunting or fishing areas?
 - j. If it causes considerable adverse effects to resources, what alternatives have been tried in the past, and why were they not successful?
2. **Route Redundancy**-Tell them why each route is unique, different difficulty levels, scenery, distance, views, etc. Photos really help.
3. **Intermittent Stream, Washes, Erosion, or Steep terrain** Ask what remedies have already been taken, and provide documentation when they were tried and the results. Ask what and when other remedies have already been tried, and explain why they have not worked. What other mitigations have not been attempted yet. Ask them to show when and how they asked for help from the community, and the community did not respond. This is especially important if you are a club member.



4. **Off Route Travel**-Ask why they think it is occurring and what measures have been taken to remedy it and why they have not worked.
5. The **Route Report** has a question that reads something like “**Can the anticipated potential impacts to the identified resources be avoided, minimized, i.e. reduced to acceptable levels, or be mitigated**”
 - a. **If the answer to this is Yes**, dive into a series of questions asking Why they are recommending closure or more limited restrictions?
 - b. **If the answer to this is No**, ask them which resource impacts on this route could not be minimized or avoided by any strategy other than closure? What other options were considered but discounted, and Why?
6. **Historic use of the route**. If you know that this route has been used historically, indicate the depth of your knowledge. If you have old photos of the route being used, attach those as supporting documentation. If it is listed in a guidebook, published material, or event, list that as evidence to the best of your knowledge. If you have a personal history of using this trail, tell it.
7. **Handicapped, Elderly, or Special Needs** - If you are prevented from recreating as a result of this decision, explain how specifically it will affect you. Be specific about your prior use or desire to recreate here, and why it is important to have this area/route available for motorized OHV. The ADA focused on equality of opportunity, but Biden’s “Executive Order on Advancing Racial Equity and Support for Underserved Communities through the Federal Government” targets equality of outcome, a significantly higher standard than ADA’s Opportunity standard. If you are a disabled veteran, this particularly has an impact and should be mentioned.

Watch our Educational Videos on Youtube <http://www.youtube.com/@utahpubliclandsalliance>

Clubs and Organizations Should Also Consider These Comments

8. The Wilderness Act specifically states by Congress that “it **does not intend for the designation of the wilderness areas to create protective perimeters or buffer zones.**” Thus, all of the routes surrounding the borders of WAs or WSAs are protected by the Wilderness Act. The stated purpose of the Dingell Act was to dedicate additional wilderness areas within Emery County, and reserving the area outside those borders for multi use. The borders of the WAs and WSAs are not fuzzy lines, they are very well defined and marked. Route # SSXXXX intersects or parallels the XXXX Wilderness Area, what authority gives you the the right to close this route?
9. **For wildlife concerns, the focus is on Conservation (Use this language)**. Where in the scientific literature or research reports does it indicate that closure is the only option. If special status or endangered species are listed as a concern, ask them to point out in the EA that OHV use has been specifically identified as a major concern compared to other uses, and what mitigations were considered and not chosen, why not? Possibilities include alternate routing, seasonal closure, fencing, barriers, cattle guards, temporary closures for unusual wildlife movement.



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10. **Habitat Expansion**-The goal of FLPMA is to sustain multiple use, where in the science reports does it indicate how much habitat is needed? Are there reports contained in the EA that conflicted with the need for expansion of habitat, please provide those references. How did they arrive at that conclusion that led to this action? Did they consider only the TMA, or the entire surrounding landscape including the already existing Wilderness areas and areas outside the affected area? How do you balance the need for expanded habitat with the multi use purpose of human use. What scientific basis requires that you restrict only motorized OHV, and not other users?
11. **For Archaeologic or Cultural concerns**-What mitigations could be adopted to minimize the impact? Some details will be in Draft EA report, but they are prohibited by Federal law from discussing any details about these resources, but Comments focused on efforts to **Preserve the Resource (Use this language)**, and questioning what possible mitigations, rerouting, avoidance, containment, barriers, preventing parking, interpretive signing were considered to Preserve the Resource. Why did none of these measures work?
12. **Provide New Information you have that you cannot find in the EA**-Ask them to point out to you that it was considered.
13. **Have external conditions changed** since scoping was done? Closures in Moab, San Rafael Swell Desert, Grand Staircase, Bears Ears, others are coming. How many of the Open and Closed routes did you measure the traffic for, and how do you project the impact will be on the remaining routes?
14. **What criteria were used to balance decisions for the route? What was the predominant impact that required you to conclude closure was the only option?**
15. The public's desire to recreate via motorized OHV has been expanding exponentially in recent years in Utah, please consider this and **show the results of your user traffic studies that demonstrates visitors by various user groups over the last 5 years. Where in the EA have you considered and addressed the demand for public access by various means?**
16. **Economic Impact**-If you have information about economic impacts by the closure, it should be mentioned somewhere in your comments.
17. **If you have concerns with the Alternatives.** Was the big picture presented fairly, or was it inaccurate or biased? For example, in the Swell, I do not believe Alternative A depicts the current management practices of the Swell. Active management has in fact been closer to Alternative D. BLM has adopted the narrative that Alt B would only eliminate 200 miles of routes, but most of us believe the loss will be closer to 1000 miles. The standard BLM policy is that existing trails on the ground are open for OHV unless specifically closed. All previous inventories of the Swell have been inaccurate, incomplete, or completely missing, resulting in poor management of the resources and enforcement. Please provide the current Swell Management Plan with all amendments, and point out exactly where they indicate the status of routes as open, limited, or closed to motorized OHV. Please be sure to include the date that these rules were adopted, and how they were adopted (prior TMP, RMP, Dingell Act, etc)
18. How were the **boundaries of the TMA** established?
19. If you are an expert in any of the scientific fields involved in the report and have questions, you can state your experience and credentials, and **request a meeting with the specialists**



that drafted the report (e.g. Archeology, Paleontology, Wildlife, or Soils) Advise UPLA or BlueRibbon Coalition if you are requesting such a meeting.

Use TrailSaver to record your notes on every Route you ride.



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Facilitator(s): Tom Folks
Les Weeks **Initial Evaluation Date:** 6/5/2020

Evaluators: **Brandon Johnson**, Realty Specialist
James Holland, Geologist
Lisa Church, Wildlife Biologist
Lou Pratt, GIS/Transportation Director
Clay Stewart, Assistant Field Manager

Jason Stewart, GIS Specialist
Carson Gubler, Rangeland Management Specialist
Dan Gunn, Outdoor Recreation Planner
Shea Owens, Legal Council

TMA: Trail Canyon
Length: 3.26 miles **Width:** Graded Track **Class:** Wild Inv Road **Use Level:** High
Route Type(s) Principal Feeder
Surface & Maint. Bladed

Additional Information County Class D. This is the middle portion of route 20 that is within the WSA. Other portions of route 20 will be addressed as separate segments, and numbered differently. Route designation applies only to those portions of the route located on public lands managed by BLM.
Do Not Designate - Route is in WSA

Citizen Comments and Proposals

Author	Designation	Comment or Proposal
None.		

General Evaluation Questions

<p>Does this route:</p> <ul style="list-style-type: none"> <input type="checkbox"/> either wholly or in part, have a right-of-way grant or is it simply an officially-recognized route with a record of management by another government agency? <input checked="" type="checkbox"/> provide commercial, private property, or administrative access, e.g., via permit, ingress/egress rights or management responsibility? <input checked="" type="checkbox"/> provide a principal means of connectivity within a Travel Management Area or sub-region? <input checked="" type="checkbox"/> exist as part of an officially recognized part of an Agency planning document and is subject to maintenance? <input type="checkbox"/> provide an important linkage between Travel Management Areas or planning sub-regions? 	YES
<p>Does this route contribute to recreational opportunities, route network connectivity, public safety, or other public multi-use access opportunities enumerated in agency Organic laws?</p>	YES
<p>Might the continued use of this route potentially impact:</p> <ul style="list-style-type: none"> <input checked="" type="checkbox"/> State or Federal special status species or their habitat? <input checked="" type="checkbox"/> cultural or any other specially-protected resources or objects identified by Agency planning documents, plan amendments? <input checked="" type="checkbox"/> any special area designations, e.g., National Monuments? <input checked="" type="checkbox"/> any other resources of concern? 	YES
<p>Can the anticipated potential impacts to the identified resources be avoided, minimized, i.e., reduced to acceptable levels, or be mitigated?</p>	YES
<p>Can the commercial, private property, recreation or public uses of this route be adequately met by another route or routes that may minimize impacts to the resources identified as part of this evaluation or that may minimize cumulative effects on various other resources?</p>	NO

Evaluation Information

Commercial, Administrative, Property and Economics

Route Management Objective(s) identify the purpose and need of the route:

This route provides important access to the following facilities and/or jurisdictions shown below for the purpose of carrying out administrative and/or authorized operations or for property access where applicable.

Facilities & Access	Specifically	Primary	Alternate	Link	Memo
Jurisdictional Access	Private Lands	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Agency Facilities	Monitoring Site	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Lease Facilities	R.S. 2477 claim	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Lease Facilities	Utility/ROW Exclusion Area	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Range Facilities	Active Allotment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Range Facilities	Cattleguard	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Range Facilities	Exclosure Fence	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Range Facilities	Livestock Trailing	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Range Facilities	Pasture Fence	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

('Primary access' is the main route into a jurisdiction or facility. 'Alternate access', while leading directly to a jurisdiction or facility, it is not the main access and therefore may not be as important as a primary. 'Link access' does not lead directly to a jurisdiction or facility, but would be required to access a primary access.)

Recreational Uses

Route Management Objective(s) identify the purpose and need of the route:

This route provides public access to the following facilities using the listed travel modes for the purposes of engaging in the listed recreation activities.

Facilities	Description	Primary	Alternate	Link	Memo
Recreation Facilities	Campsite - Undeveloped	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Recreation Facilities	Parking Area - Undeveloped	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Travel Modes	Description	Primary	Secondary	Infreq
Modes of Transportation	Stock 4 Wheel Drive	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Modes of Transportation	UTV	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Modes of Transportation	ATV	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Modes of Transportation	2WD vehicle	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Modes of Transportation	By Foot	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Modes of Transportation	By Horse	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Modes of Transportation	Motorcycle	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Activities	Description	Primary	Secondary	Infreq
Public Use Activities	Antler Shed Hunting	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Public Use Activities	Camping	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Public Use Activities	Canyoneering	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Public Use Activities	Equestrian	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Public Use Activities	Cultural / Historical Viewing	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Public Use Activities	Hiking	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Public Use Activities	Hunting	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Public Use Activities	Photography	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Public Use Activities	Sightseeing	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Public Use Activities	Vehicle Exploring	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Public Use Activities	Wildlife Watching	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Public Use Activities	Woodcutting	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Public Use Activities	Backpacking	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

(Primary access are the main uses on the route by the public. Secondary uses, while common, are not the main use on the route. Infrequent uses are uses that are rare on this route, but have been observed.)

Special Resource Concerns

Resources Evaluated:

This route is in, leads to, crosses or is proximate to the natural and/or cultural resources and resource concerns listed below.

Resource/Concern	Specifically	In	LeadsTo	Crosses	Prox	Dist	Memo
Biome	Pinyon-Juniper	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
	Woodland						
Biome	Sagebrush Steppe	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Managed Species	Desert bighorn sheep	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
	crucial year-long habitat						
Managed Species	Turkey/Quail habitat	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Managed Species	Migratory bird habitat	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Managed Species	Mule deer crucial	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
	habitat						
Managed Species	Fisheries (native)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
VRM	VRM Class I - Preserve	<input checked="" type="checkbox"/>					
	existing character						
Sp. Mgnt. Areas	WSA - Wilderness Study	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1/4 Mile	
	Area						
Sp. Mgnt. Areas	ERMA - Extensive	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
	Recreation Management						
	Area						
Sp. Mgnt. Areas	Wild and Scenic River	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
	Corridor						
Water Resources	Ephemeral stream	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Water Resources	Perennial stream	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Water Resources	Riparian	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Misc. Resources	Lands w/ Wilderness	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	1 foot	
	Character						
Misc. Resources	PFYC Class 2 - Low	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Resource Issues	Noxious weeds	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
Resource Issues	Route proliferation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Resource Issues	Invasive vegetation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		

Note: Specific sensitive resources, such as cultural or paleontological resources or Threaten or Endangered Species that may potentially be affected by this route are not listed in this report for their protection. These resources will be analyzed in the NEPA process included in the planning process of route designation.

Potential Alternative Route Designations

Alternative A (Current Management, No Action Alternative)

Area Designation:

Limited to Designated Routes

Route Designation:

Open

Specific designations by user type:

Administrative/Official Users: All Federal, State and Local agencies may use this route by all motorized modes, year-round.

Authorized/Permitted Users: Currently authorized users may use this route by all motorized modes, year-round.
Additional users may be authorized by the BLM through future authorizations.

Non-motorized Public: The public may use this route by all non-motorized modes, year-round.

OHV Public: **Designation per 43 CFR § 8342.1: Open** - The public may use this route by all motorized modes, year-round.

Alternative B

Comprehensive Designation:

CLOSED

This route will be decommissioned and not managed as a BLM transportation asset. Unless otherwise signed, cross-country foot and animal use is allowed in the area.

OHV Public: Designation per 43 CFR § 8342.1: Closed

Specific Designation Criteria Addressed and Relevant to Route Issues:

- 43 CFR § 8342.1 (a) Areas and trails shall be located to minimize damage to soil, watershed, vegetation, air, or other resources of the public lands, and to prevent impairment of wilderness suitability.
- 43 CFR § 8342.1 (b) Areas and trails shall be located to minimize harassment of wildlife or significant disruption of wildlife habitats. Special attention will be given to protect endangered or threatened species and their habitats.
- 43 CFR § 8342.1 (d) Areas and trails shall not be located in officially designated wilderness areas or primitive areas. Areas and trails shall be located in natural areas only if the authorized officer determines that off-road vehicle use in such locations will not adversely affect their natural, esthetic, scenic, or other values for which such areas are established.

How Designation Addresses Criteria Above:

Rat67: By closing the route, the potential for future impacts to documented wilderness character and impairment of wilderness suitability would be minimized while wilderness characteristics of naturalness and opportunities for solitude would be enhanced.

Rat107: Per the Settlement, BLM is directed to analyze, within WSAs or Natural Areas, at least one alternative route network that would enhance BLM-inventoried wilderness characteristics by designating the routes or the relevant portions thereof as closed to ORV use.

Rat45: Closing the route would reduce the potential for impacts to MSO habitats by eliminating motorized use and removing the route footprint.

Rat39: Closing this route would enhance wildlife habitat by eliminating motorized use and removing the route footprint.

Rat41: Closing this route would enhance wildlife movement by reducing fragmentation.

Designation Criteria Addressed but Not Relevant to Route Issues:

(no known conflicts among users or no known resource concerns to minimize for)

- 43 CFR § 8342.1 (c)

Closure Method: Sign Closed; Fence or barrier to natural barrier

Alternative C

Comprehensive Designation:

OPEN W/ MANAGEMENT

Specific designations by user type:

Administrative/Official Users: All Federal, State and Local agencies may use this route by all motorized modes, year-round.

Authorized/Permitted Users: Currently authorized users may use this route by all motorized modes, year-round.
Additional users may be authorized by the BLM through future authorizations.

Non-motorized Public: The public may use this route by all non-motorized modes, year-round.

OHV Public: **Designation per 43 CFR § 8342.1: Open** - The public may use this route by all motorized modes, year-round.

Designation Criteria Addressed and Relevant to Route Issues:

- 43 CFR § 8342.1 (a) Areas and trails shall be located to minimize damage to soil, watershed, vegetation, air, or other resources of the public lands, and to prevent impairment of wilderness suitability.
- 43 CFR § 8342.1 (b) Areas and trails shall be located to minimize harassment of wildlife or significant disruption of wildlife habitats. Special attention will be given to protect endangered or threatened species and their habitats.
- 43 CFR § 8342.1 (d) Areas and trails shall not be located in officially designated wilderness areas or primitive areas. Areas and trails shall be located in natural areas only if the authorized officer determines that off-road vehicle use in such locations will not adversely affect their natural, esthetic, scenic, or other values for which such areas are established.

How Designation Addresses Criteria Above:

Rat61: Continued use of this primitive route would minimize impacts to wilderness characteristics (LWC or Natural Area) by providing reasonable access to these lands on a pre-existing route, reducing the potential for new disturbances from cross-country use.

Rat10: Allowing continued use of this existing route, which provides the best access to pasture fence, would minimize the potential for new disturbances to documented resources from cross-country use or the need for construction of new routes to provide similar access.

Rat9: Continued use of this route with the added application of specific management prescriptions, would minimize potential impacts to documented resources.

Rat6: Allowing continued use of this route would minimize potential impacts to documented resources by concentrating motorized use (rather than dispersing it) on an alignment capable of accommodating the route’s anticipated traffic volume.

Rat50: Due to the typical traffic volume and speeds expected on this route, allowing its continued use would contribute to minimizing the overall route network’s potential for soil erosion, habitat disruption, wildlife harassment, vegetative damage and impacts to cultural resources.

Designation Criteria Addressed but Not Relevant to Route Issues:

(no known conflicts among users or no known resource concerns to minimize for)

- 43 CFR § 8342.1 (c)

Potential Management Actions:

Maintenance: Signing - Directional

Mitigation: Signing - Regulatory

Monitoring: Route proliferation; Condition of WC

Potential management actions may be incorporated with an overall monitoring strategy that would assess the status and/or integrity of the potentially impacted sensitive resource or resource issues identified as they relate to various external factors, e.g., climate cycles, exotic species introduction, visitor use levels (type, intensity, and season of use), etc. Monitoring data that indicate a decline in resource integrity or reveal methods of mitigation that proved to be unsuccessful would then trigger adaptive and appropriate responses aimed at restoring integrity or successfully mitigating undesirable conditions.

Memo(s): An interdisciplinary team evaluated this route within a WSA and concluded that its presence within the area supports the management emphasis of this alternative and meets the intent of BLM Manual 1626, Sec. 6.5.E.1. (from BLM Manual 6330) in permitting “motorized and mechanized use to continue along existing routes identified in the wilderness inventory conducted in support of sections 603 and 202 of FLPMA.” While these routes may continue to be used as stated, Sec. 6.5.E.1. also states that BLM will not “designate primitive road or motorized/mechanized trails”....” or classify them as assets.” For this alternative, the route evaluation team will likewise not choose, to 1) designate this route as a “non-motorized and non-mechanized trail” or 2) to “Close the route to motorized/mechanized use.” This route alternative will therefore not be part of the current travel management decision package but will be displayed on maps only as a ‘primitive route’.

Alternative D

Comprehensive Designation:

OPEN W/ MANAGEMENT

Specific designations by user type:

Administrative/Official Users: All Federal, State and Local agencies may use this route by all motorized modes, year-round.

Authorized/Permitted Users: Currently authorized users may use this route by all motorized modes, year-round.
Additional users may be authorized by the BLM through future authorizations.

Non-motorized Public: The public may use this route by all non-motorized modes, year-round.

OHV Public: **Designation per 43 CFR § 8342.1: Open** - The public may use this route by all motorized modes, year-round.

Designation Criteria Addressed and Relevant to Route Issues:

- 43 CFR § 8342.1 (a) Areas and trails shall be located to minimize damage to soil, watershed, vegetation, air, or other resources of the public lands, and to prevent impairment of wilderness suitability.
- 43 CFR § 8342.1 (b) Areas and trails shall be located to minimize harassment of wildlife or significant disruption of wildlife habitats. Special attention will be given to protect endangered or threatened species and their habitats.
- 43 CFR § 8342.1 (d) Areas and trails shall not be located in officially designated wilderness areas or primitive areas. Areas and trails shall be located in natural areas only if the authorized officer determines that off-road vehicle use in such locations will not adversely affect their natural, esthetic, scenic, or other values for which such areas are established.

How Designation Addresses Criteria Above:

Rat113: Per IM No. UT 2012-066, all routes with an acknowledged or documented purpose and need should be proposed for an open designation under at least one alternative. This includes all Class D Roads recognized by the State of Utah and submitted by local counties.

Rat61: Continued use of this primitive route would minimize impacts to wilderness characteristics (LWC or Natural Area) by providing reasonable access to these lands on a pre-existing route, reducing the potential for new disturbances from cross-country use.

Rat10: Allowing continued use of this existing route, which provides the best access to pasture fence, would minimize the potential for new disturbances to documented resources from cross-country use or the need for construction of new routes to provide similar access.

Rat9: Continued use of this route with the added application of specific management prescriptions, would minimize potential impacts to documented resources.

Rat6: Allowing continued use of this route would minimize potential impacts to documented resources by concentrating motorized use (rather than dispersing it) on an alignment capable of accommodating the route's anticipated traffic volume.

Rat50: Due to the typical traffic volume and speeds expected on this route, allowing its continued use would contribute to minimizing the overall route network's potential for soil erosion, habitat disruption, wildlife harassment, vegetative damage and impacts to cultural resources.

Designation Criteria Addressed but Not Relevant to Route Issues:

(no known conflicts among users or no known resource concerns to minimize for)

- 43 CFR § 8342.1 (c)

Potential Management Actions:

Maintenance: Signing - Directional

Mitigation: Signing - Regulatory

Monitoring: Route proliferation; Condition of WC

Potential management actions may be incorporated with an overall monitoring strategy that would assess the status and/or integrity of the potentially impacted sensitive resource or resource issues identified as they relate to various external factors, e.g., climate cycles, exotic species introduction, visitor use levels (type, intensity, and season of use), etc. Monitoring data that indicate a decline in resource integrity or reveal methods of mitigation that proved to be unsuccessful would then trigger adaptive and appropriate responses aimed at restoring integrity or successfully mitigating undesirable conditions.

Memo(s): An interdisciplinary team evaluated this route within a WSA and concluded that its presence within the area supports the management emphasis of this alternative and meets the intent of BLM Manual 1626, Sec. 6.5.E.1. (from BLM Manual 6330) in permitting “motorized and mechanized use to continue along existing routes identified in the wilderness inventory conducted in support of sections 603 and 202 of FLPMA.” While these routes may continue to be used as stated, Sec. 6.5.E.1. also states that BLM will not “designate primitive road or motorized/mechanized trails”....”or classify them as assets.” For this alternative, the route evaluation team will likewise not choose, to 1) designate this route as a “non-motorized and non-mechanized trail” or 2) to “Close the route to motorized/mechanized use.” This route alternative will therefore not be part of the current travel management decision package but will be displayed on maps only as a ‘primitive route’.