

Date: June 28, 2024

Bureau of Land Management, Moab Field Office 82 East Dogwood Moab, Utah 84532

Via Submission on ePlanning and Emails to:

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BLM Moab Field Office Project Planner
ehowarth@blm.gov

Nicole Flint BLM Planning & Environmental Specialist nflint@blm.gov

RE: Dolores Travel Management Plan, Scoping (DOI-BLM-UT-Y010-2024-0029-EA)

Dear BLM Planning Team,

I am submitting this supplement to the comments I previously submitted by me for Utah Public Lands Alliance (UPLA) on the <u>Dolores Travel Management Plan</u>¹, Public Scoping Period, hereto forward referred to with the acronym TMP.

There are a large number of missing routes in the route inventory and map provided as part of the documents for TMP Scoping. I completed a review of routes in one segment of the Dolores TMA, and quickly identified <u>28 routes</u> that are missing from the inventory. Further ground proofing is necessary to identify other missing routes, of which there are certainly many.

Additionally, I am in the process of securing a complete map of inventoried routes for the Dolores TMA via a grant-funded project that was conducted just a few years ago. The map identifies a myriad of routes that have been omitted from the Scoping map for this TMP. Given that the Scoping comment period closes today, I mention this map now as I am unable to provide it at this moment. As soon as it is available, it would behoove the TMP planning team to utilize it



for ground proofing the full inventory of routes in the Dolores TMA and provide the public with an accurate mapped inventory of routes prior to initiating the Analysis phase of the NEPA process. Please contact me to inform me who would be the best point of contact within the TMP planning team for me to coordinate communication and sharing of the map when it is available.

Furthermore, I have observed that County, State, and RS 2477 claimed roads are not designated in the TMP inventory separately. Each of these roads should be identified separately from designated OHV routes within the TMP. County and State roads are not managed by the BLM, nor are they part of Travel Management Planning. RS 2477 claimed routes should be separately identified in the inventory so that when adjudication is complete, they may be added to the inventory as an addendum.

I have attached a PDF map of the Dolores TMA to demonstrate the location of the 28 missing routes that I identified, along with a .kmz file to show the precise locations. Please contact me for more details such as route coordinates, etc.

Finally, during the open Scoping period, I have reached out to the three individuals who are noted in the opening of this comment letter, as they are also listed as the TMP project contacts on the BLM planning website. Unfortunately, I have not received a response to my outreach. I have included a copy of my email outreach to this supplemental comment letter. I have questions related to this TMP and request that the TMP planning team contact me promptly to discuss.

Utah Public Lands Alliance would like to be considered an interested public for the TMP. Information can be sent to the following address and email address:

Rose Winn Utah Public Lands Alliance PO Box 833, St. George, UT 84771 rose@utahpla.com

Sincerely,

Rose Winn Natural Resources Consultant Utah Public Lands Alliance 559.862.6382 Loren Campbell President Utah Public Lands Association 909.499.3295

Dolores TMP Scoping - Missing Routes

Routes shown in red have been omitted from the map of inventoried routes that the BLM provided for public review during the Scoping period for the Dolores TMA

