



Date: June 21, 2024

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Via Submission on ePlanning and Emails to:

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

Dear BLM Planning Team,

Utah Public Lands Alliance (UPLA) is writing to provide public comment on the [Dolores Travel Management Plan](#)<sup>1</sup>, Public Scoping Period, hereto forward referred to with the acronym TMP. Many of our members and supporters live near and/or recreate throughout the 126,829 acres of the Planning Area in Utah that will be impacted by the TMP. This letter of comment shall not supersede the rights of other UPLA agents, representatives, or members from submitting their own comments; the Bureau of Land Management (BLM) should consider and appropriately respond to all comments received for the TMP.

UPLA is a non-profit organization representing over 5,800 members, in addition to speak out for 69 OHV clubs and organizations. We advocate for responsible outdoor recreation, active stewardship of public lands, and encourage members to exercise a strong conservation ethic including “leave no trace” principles. We champion scrupulous use of public lands for the benefit of the general public and all recreationists by educating and empowering our members to secure, protect, and expand shared outdoor recreation access and use by working collaboratively



with public land managers, all recreationists, and other public land stakeholders. Our members participate in outdoor recreation of all forms to enjoy federally and state managed lands throughout Utah, including BLM and US Forest Service managed public lands. UPLA members visit public lands to participate in motorized and human-powered activity such as off-roading, camping, hiking, canyoneering, horseback riding, sightseeing, photography, wildlife and nature study, observing cultural resources, and other similar pursuits on a frequent and regular basis throughout every season of the year. UPLA members and supporters have concrete, definite, and immediate plans to continue such activities in the Dolores Travel Management Area (TMA) throughout the future.

I, Rose Winn, am an avid outdoor recreation enthusiast and anthropologist; hiking, backpacking, backcountry horseback riding, camping, rock climbing, off-roading, fishing, forage of wild herbs and plants for medicinal uses, and exploration of cultural and archeological sites and artifacts on public lands are among my core areas of activity and interest. I serve as the Natural Resources Consultant for Utah Public Lands Alliance (UPLA), a non-profit organization dedicated to keeping offroad trails open for all recreation users. While my profession allows me to advocate to protect public access to public lands for all stakeholders and multiple-uses, I also work as a volunteer on conservation, mitigation, and restoration projects on public lands.

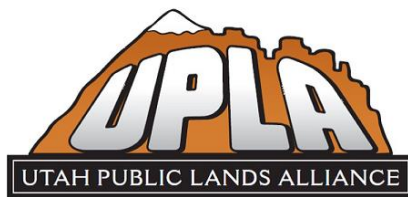
As a joint writer of this comment letter, Loren Campbell is a Jeeper and UTV enthusiast from Virgin, Utah. Loren serves as the President of Utah Public Lands Alliance (UPLA). We share a strong interest in maximizing opportunities for offroad motorized recreation. Loren works full time as a volunteer advocate to protect access for all users, but also organizes and works as a volunteer on projects on public lands. UPLA, Loren, and myself are also members of BlueRibbon Coalition. These comments are submitted on behalf of both myself and Loren Campbell, as well as our members and followers from within and outside of Utah.

Please note our support and agreement with the comments submitted by BlueRibbon Coalition.



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## GENERAL COMMENTS

UPLA recognizes the positive mental, spiritual, physical, and social benefits that can be achieved through outdoor recreation. We also recognize that outdoor recreation provides business owners and local communities with significant financial stimulus. Of foremost importance to our motivations for this comment letter: our members are directly affected by management decisions concerning public land use in the Dolores TMA, including and especially, decisions that impact the scope and implementation of the multiple-use mandate, and related balance of public access and outdoor recreation with conservation of natural and cultural resources.

Our members subscribe to the tenets of:

- Public access to public lands now, and for all future generations
- Active stewardship for the benefit of all US citizens who collectively own our public lands as part of our national endowment
- Effective management of public lands to ensure the safety of all who enjoy them
- Conservation of ecological, cultural, and archeological resources in balance with implementation of the Congressional mandate for multiple-use public land management

UPLA members as well as the general public desire access to public lands now and in the infinite foreseeable future. Restricting access today deprives the public of the opportunity to enjoy the many natural wonders of public lands. UPLA members and the general public are deeply concerned about the condition of the environment and public safety. They desire safe means to access public lands to engage in conservation efforts as well as outdoor recreation. UPLA supports the concept of managed recreation and believes it is prudent to identify areas where both motorized and non-motorized use is appropriate.

The [BLM manages 22.8 million acres of public land in Utah](#)<sup>2</sup>, representing 42% of the total land mass in this state. In Grand County where the Dolores TMP is located, the TMA represents 5% of the available land, which is surrounded on all sides by other BLM lands including: Labyrinth Rim / Gemini Bridges, Canyon Rims, and Book Cliffs The Westwater Canyon WSA and the Palisade WSA are proximate to the TMA. Utah's public lands offer the primary source for the public to enjoy outdoor recreation. Reduction or elimination of public access to BLM managed land thus bears the potential to increase user conflicts and resource damage by removing sufficient access to public lands for all forms of outdoor recreation.

As the BLM is considering critical issues to inform how the Draft EA for this TMP is written, we are concerned for risk of recreational values being placed in an inferior position of priority among the range of public land values to be analyzed. We frame this comment letter with a



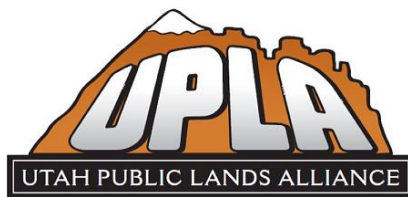
reminder that it is the BLM's Congressionally-directed responsibility to develop TMP alternatives that serve to maximize the multiple-use directive, and place recreational values in equal status for optimization as all other public land values. TMP alternatives that function to close or restrict motorized, recreational, and other public access would negatively impact UPLA members, as well as all members of the general public who enjoy outdoor recreation on BLM managed lands, by significantly minimizing their ability to access public land. In accord with legal and procedural dictates, the TMP must provide a true recreation alternative as required by NEPA.

As Congressionally-designated managers, it is the responsibility of the BLM to optimize management protocol to balance conservation of natural and cultural resources with public access and enjoyment of public lands within the TMA. By the letter and spirit of the law, it is neither necessary nor prudent to restrict or eliminate public access to BLM-managed public lands as the primary management tool; to do so, when alternative mechanisms for management that would effectively balance conservation with public access, is both arbitrary and capricious.

While drafting the proposed TMP Environmental Assessment, the BLM is legally and procedurally compelled to address the following plan components:

1. Congressional direction, Congressional intent, and federal agency operational guidelines
2. TMP route analysis
3. Relationships between routes and species of concern
4. Proposed national monument should not influence Dolores TMP
5. Inaccurate maps
6. First Amendment rights
7. Impacts on outstanding multiple-use values and cumulative impacts
8. Economic impacts
9. Discrimination of members of the public with disabilities and impoverished communities
10. Conformity with Utah State law
11. Education
12. Current management
13. Safety impacts leading to irreparable harm
14. Transparency and ease of submitting comments by public
15. Dissenting opinions

In summary reference to the items noted above, with additional detail for each following within this comment letter, we support any additional comments from individuals, groups, associations, and the general public that encourage the BLM to adhere to the Congressionally-mandated



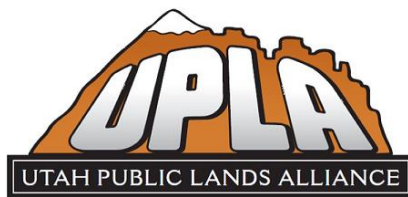
NEPA directive that requires a true recreation alternative as an option for public comment. We support any additional comments that encourage the BLM to uphold their mission and commitment to the public to manage public lands in the Dolores TMA in a manner that maximizes public access, and sustains the health, diversity, cultural resources, and values of the land for the use and enjoyment of present and future generations. We strongly advocate against any components of the TMP that would diminish or eliminate public access to the Dolores TMA.

### **CONGRESSIONAL DIRECTION, CONGRESSIONAL INTENT, & BLM OPERATIONAL GUIDELINES**

The BLM manages public lands and subsurface estate under jurisdiction granted by the United States Congress, in accord with the [Federal Land Policy and Management Act of 1976](#)<sup>3</sup> (FLPMA). The BLM are contracted public land managers, with direct accountability to the citizens of the United States for the method and outcomes of their management actions. The BLM does not possess ownership of the public lands they are privileged to manage through Congressional directive. Neither does the BLM possess sole discretion to exercise management authority that excludes the vested interests of the full citizenship of the USA. As elected leaders, the US Congress is the only entity which may direct the BLM's management protocol. US citizens are protected from the risk of BLM overreach in management authority by the functions of congressional process, FLPMA, NEPA, as well as the broader framework of the US Constitution.

Since its inception as a federal agency, [the BLM has been explicitly, and very clearly, directed to manage public lands per the multiple-use mandate](#)<sup>4</sup>. Per the definition of multiple use within [U.S. Code § 1702 Title 43](#)<sup>5</sup>, the term "multiple use" means:

*"The management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people; making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions; the use of some land for less than all of the resources; a combination of balanced and diverse resource uses that takes into account the long-term needs of future generations for renewable and nonrenewable resources, including, but not limited to, recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific and historical values; and harmonious and coordinated management of the various resources without permanent impairment of the productivity of the land and the quality of the environment with consideration being given to*



*the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output.”*

When drafting alternatives for the Dolores TMP, it is critical that the alternatives presented must not serve to diminish or eradicate the purpose and implementation of the multiple-use mandate on BLM managed public lands. As set forth in law, the BLM’s mission and congressional management directive is to achieve quality land management under the sustainable multiple-use management concept to meet the diverse needs of the people of the United States. The BLM’s operational guidelines clearly state that the foundational framework for all management action is to uphold and expand the multiple-use objective, manage public lands for the benefit of the people (all citizens of the USA), to maintain transparency and accountability in all decisions and actions, to execute decisions in a way that is fair to the public, and most importantly – to follow the law and congressional intent.

Since its inception in 2014, UPLA has been an active, responsible partner of the BLM, with members continually engaged in volunteer service to advance conservation, trail and landscape maintenance, public education, public safety, and cooperative public land management. UPLA members have a longstanding history of visiting BLM managed lands as individuals, groups, and for organized outdoor recreation events. Casual use and organized events like ours bring public land visitors to public lands in an orderly and controlled manner. This ensures conservation of the landscape and wildlife habitat, while preventing overcrowding and user conflict. Our events and membership doctrines promote land use ethics, responsible camping, respect for natural resources, and public safety. It is critical that the management policies set forth in the Draft EA will not obstruct the membership of UPLA, as well as members of the general public, from accessing vital areas of the Dolores TMA for organized, safe, conservation-centric recreation. This may be accomplished by ensuring that general public access, access via OHV routes, or and access for all varieties of outdoor recreation opportunities that are currently enjoyed in the Dolores TMA are explicitly protected through an active management plan.

Elimination of public access and failure to adhere to the multiple-use objective would be a violation of Congressional direction and Congressional intent for the scope of limitations by which the BLM is authorized to manage our public lands. It is critical for the TMP planning managers to bear in mind that the BLM does not own our public lands. BLM managed lands are a part of the public endowment, as all public lands are owned by the citizens of the USA (the public); the BLM is merely contracted to manage those lands within the defined scope of limited authority that is granted by Congress. **The TMP for the Dolores TMA must demonstrate that the BLM is not overstepping Congressional direction and Congressional intent such that the best interests and needs of the public would be overrun through restriction or**



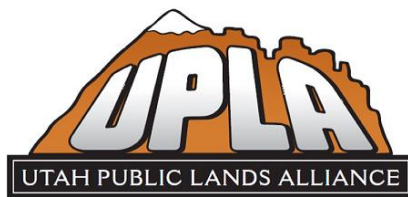
**elimination of public access to public lands through restriction or closure of access via designated OHV routes, designated OHV riding areas, and designated outdoor recreation areas.**

### **TMP ROUTE ANALYSIS**

Given the outstanding exceptional recreational values held within the Dolores TMA, it is critical that the TMP include comprehensive detail for all forms of recreation for public review and analysis. **TMP static maps, dynamic interactive maps, and draft EA documents should include:**

- **Detailed route reports for all inventoried routes, including:**
  - Route ID
  - Route common name
  - Route location by coordinates and major geographic landmarks, including the ability to download track info in gpx format from the interactive maps; this is essential for the public to be able to identify the precise location of the route, and to be able to verify the accuracy of the route and identify routes that may have been left out of the inventory
  - Routes that are not subject to control of the BLM, such as County and State highways, should be depicted on the maps but **SHOULD NOT** be included as OPEN OHV routes; to include these routes as OPEN OHV is a gross minimization of the impact of closures of authorized routes
  - Route length, challenge rating, and designated usage (IE: open or limited)
  - Rates of usage (volume and frequency of use, peak seasonal usage if applicable, percentage breakdown of users by recreation type)
  - Natural or cultural resource concerns that transect each route
  - Cultural sites and usages located in proximity to the route
  - All recreational values connected to the route (IE: improved campgrounds, dispersed camping, hiking, backpacking, canyoneering, rock climbing, wildlife viewing, kayaking, canoeing, rafting, fishing, photography, cultural site observation or research, bird watching, etc.), including the number of miles/hours to access these recreation sites
  - All multiple-use values connected to the route (IE: grazing, mining, etc.)
- **User-created routes**
- **Routes that have been closed or decommissioned since 1980**
- **RS 2477 routes**
- **Access to in-holdings and other valid existing interests**





**Route analysis should also note whether there is currently, or has been in the past, any involvement from volunteers to conduct adopt-a-trail efforts to maintain, restore, or assist in management of the route.** During the current Scoping period, I reached out to the Planning Team to request information on whether, where, and at what frequency volunteer groups have been involved in trail maintenance efforts within the Dolores TMA; unfortunately, I have not received any response from BLM staff.

**If the route report indicates a “Yes” response to the General Evaluation Question “Can the anticipated potential impacts to the identified resources be avoided, minimized, i.e. reduced to acceptable levels, or be mitigated?” and the route is proposed for closure in any Alternative-**

- 1) Provide details on the specific reason(s) that avoidance, minimization or mitigation strategies were not adopted.
- 2) If any reason was the result of cost or resource availability, identify what options there might be for groups or clubs to participate with labor, monitoring or even financial resources to achieve keeping the route open.

The potential resource impacts considered by the IDT are generally a very comprehensive and lengthy list, but it is understood that not all of the impacts are considered equally. To be able for the public to understand and substantively comment on the proposed decision, BLM should:

- 1) **For resource impacts that are considered the primary concerns for that route, those impacts should be identified clearly as the dominant reason(s) for the proposed action in each alternative.**
- 2) **Resource impacts should be identified as to whether they are currently having negative impacts on the resource, the possibility or the probability of a negative impact.**
- 3) **If “User Conflicts” are a major contributing impact resulting in closure,** details on the specific types of user conflicts reported on that route, and the frequency of report of the impact in that specific area should be included in the analysis. Additionally, specific details on the methods used to investigate the validity or substantiation of the impact should be included in the Draft EA.

**Any route proposed for closure should include a detailed analysis of the impact on connectivity to routes accessing it, including the additional time and distance to navigate these alternate routes.** This analysis is critical in understanding the impact in emergency situations when time is of the essence to exit an area.



Route Reports typically contain a copyright message at the bottom of each page that reads:

*“Copyright 2021 by ARS, Inc. All Rights Reserved. No part of this publication may be reproduced, distributed, or transmitted in any form or by any means, including photocopying, recording, or other electronic or other electronic or mechanical methods, without the prior written permission of the publisher, except in the case of brief quotations embodied in critical reviews and certain other noncommercial uses permitted by copyright law”*

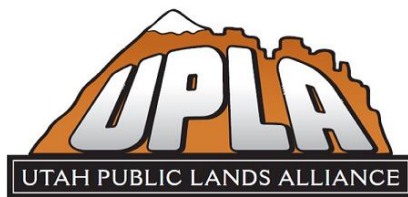
It is unclear why this statement appears at the bottom of every page of the reports if these reports were contracted by BLM for use in the public domain. It is a limiting factor in its use, there mere printing of a route report, or publishing an indexed form of the reports for each access by the public are copyright violations. Further, it clearly blocks accessibility and use of the reports by electronic means that prohibit use of material protected by copyright laws. **These copyright statements should not appear on any of the published route reports.**

**For any routes in which there are concerns regarding damage to natural or cultural resources, the TMP analysis should include details on whether mitigation measures have been attempted to address those concerns, and to what extent mitigations have or have not been effective.**

**Any route proposed to be closed for public use, but would remain open for commercial use such as river access for tour operators or cultural access by native americans, must cite the specific reasons why such use is allowed for a limited group, but not for the general public. If the use is for religious purposes or because of indigenous knowledge, the specifics of that allowance under Federal law should be explained in detail, including why that is not a First Amendment violation restricting or promoting or favoring a particular religion.**

### **RELATIONSHIPS BETWEEN ROUTES & SPECIES OF CONCERN**

In recent BLM TMPs, concerns regarding the impact of OHV recreation on ESA-listed endangered or threatened species and other species of concern, have often been cited as justification for route closures. At the same time, limited information is typically provided about the species status and any history of efforts to actively manage recreation and multiple uses to balance human needs and interests with species protections. Thus, for the Dolores TMP, it is critical that the public is afforded the opportunity to thoroughly evaluate and comment on species concerns, if there may be any.



**If there are any species that are currently listed as endangered or threatened under the Endangered Species Act, or are otherwise identified as a species of concern, the proximity of those species' populations and habitat to routes within the Dolores TMA must be clearly articulated in TMP documents, and clearly shown on both static and dynamic maps. For all such species identified, a comprehensive review of the species' status, including detail regarding the species' full range of habitat and population outside of the Dolores TMA, must be included.**

**In addition, reports from Fish and Wildlife on resource impacts, and any other agency report used in making recommendations should be included in the Draft EA.**

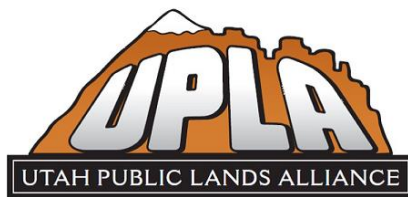
**Additionally, if any previous action has been taken to mitigate impacts of human uses on the species habitat and ability to thrive within the Dolores TMP, this should be reported in detail. All such reports must include specifics regarding the method of mitigation, the date(s) and duration of implementation, defined measures of success or lack thereof, and evidence of success or lack thereof. If mitigations have not been attempted within the Dolores TMP, an explanation should be provided as to why. If mitigations have been attempted on public or private lands outside of Dolores TMP, this should also be noted with the same details as aforementioned.**

### **PROPOSED NATIONAL MONUMENT SHOULD NOT INFLUENCE DOLORES TMP**

During public meetings for Scoping of this TMP, multiple members of the public raised concerns regarding the proposed national monument in Colorado that, if designated, would border the Dolores TMA in Utah. BLM staff responses to these concerns emphasized that there has been zero consideration for the proposed monument designation within planning for the Dolores TMP. This is good news, as such action on the part of the BLM would be both inappropriate and illegal. For the sake of formal documentation and to ensure that public comments are fully incorporated into the plan's administrative record, **we reiterate that the BLM should not contemplate crafting any component of the Dolores TMP to align with potential monument management or policy of neighboring lands that have been proposed for national monument status. Creation of buffer zones for national monuments with restricted or closed public access and multiple-uses is both illegal and unconstitutional.**

### **INACCURATE MAPS FOR PUBLIC REVIEW AND COMMENT**

Per the procedural guidelines that define and dictate NEPA analysis, the BLM is obligated to provide the public with sufficient data to allow the public to understand all of the essential



factors that influence the planning process and final decision, in order to ensure that the public may contribute relevant, substantive comments within each phase of NEPA scoping, analysis, objection resolution, and final record of decision. Maps are a critical component of that essential data. In this TMP plan specifically, given the breadth of geographic scale within the TMA footprint, and the broad range of multiple-uses and public land resources that will be impacted by the plan, maps are a vital piece of the data required for public review. Unfortunately, the maps that have been provided to the public for Scoping are wholly inadequate to inform and equip members of the public to submit relevant and substantive comments at this time.

The static map that has been made available in PDF format solely shows the lines of OHV routes on the map – it does not contain any details to note the route IDs, names, lengths, or indicate the varied types of uses associated with each route. There is no indication as to whether each route is designated as open or limited; and there is zero information regarding user-created or closed routes.

Within the dynamic maps, the layers on the maps also contain insufficient data. None of the details noted for the static map above, are included in the dynamic map. Existing high-value recreation sites, cultural sites, and other multiple-uses are omitted from the map. Additionally, routes identified on the map must show the exact location of the route by making a gpx track downloadable from the map. Without this data, it is impossible for members of the public to accurately evaluate and speak to the potential range of impacts they will experience through any changes in travel management that may be proposed in the TMP.

While the generalized impact of map inaccuracies and insufficiencies as noted above create harm on members of the American public by disenfranchising them of the right and opportunity to conduct meaningful and relevant participation within the TMP planning process, the following specific inaccuracies constitute acute harm.

### **Inaccurate Inventory of Designated OHV Routes**

Neither the static nor dynamic maps provide an accurate demonstration of the full inventory of designated OHV routes in the Dolores TMA. This is an egregious error that must be rectified! The lack of an accurately mapped route inventory makes it impossible from the outset of Scoping and Analysis for the public to provide thorough, relevant feedback on the TMP via public comment. While this error may be attributed to human error or oversight on the part of the TMP planning team during the Scoping phase of this plan... if this error is replicated within the maps provided for the Analysis phase, it will then be an intentional action that functions to obfuscate the public's rights and responsibilities for participation in this planning process.



We urge the BLM to ensure that this error is fully resolved with release of forthcoming maps for the TMP Draft EA. If the TMP planning team faces any gaps in knowledge or resources to create accurate maps, we invite the team to reach out to UPLA for support. We are more than happy to assist with reviewing the current inventory of designated OHV routes, verifying accuracy of maps, and ground-truthing routes in the field.

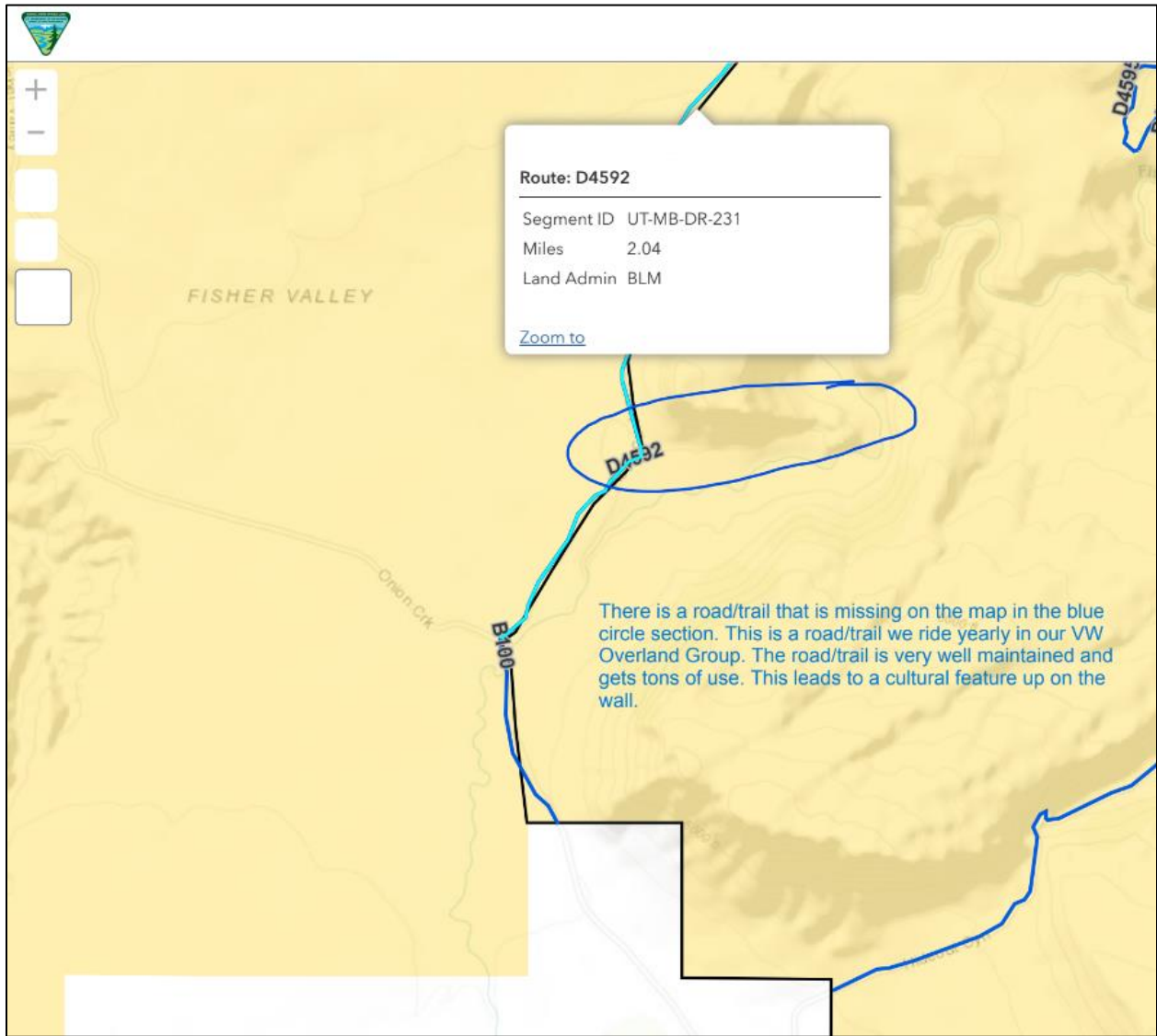
### **Recreation Opportunity Spectrum**

Neither the static nor the dynamic maps reflect the Recreation Opportunity Spectrum within the Dolores TMA. This is minimum essential data that must be provided to the public to allow for adequate and relevant evaluation of potential impacts from the forthcoming draft TMP.

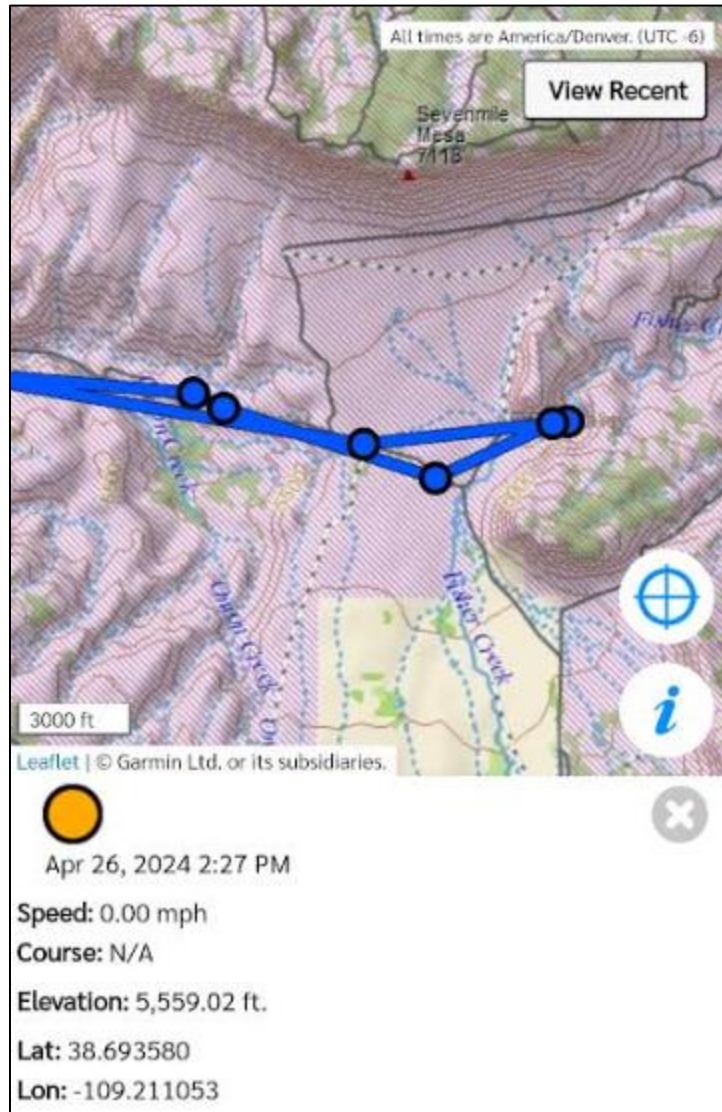
### **Current Travel System**

Details to indicate which routes are designated for varied OHV uses (IE: 4x4, ATV, motorcycle, eBike, etc.) are omitted from both the static and dynamic maps.

A significant map error was identified by an UPLA member: in the map below, the area circled in blue indicates where a route is missing entirely from the static and dynamic maps. A group of our members visit this route regularly for overlanding and camping. This route leads to a native historical site on the cliff side – a wall for what was previously a lookout tower. This is a high-value route for OHV recreation, camping, and cultural observation. It is critical that this mapping error is corrected and the route is added into the static and dynamic maps for the draft TMP.



The gps coordinates for the beginning of the road are: 38.693683, -109.216362. The coordinates for the end of the road at the loop to turn around are: 38.693476, -109.210732. Here is a screenshot of the mapped route with gps points:



### **Backcountry Airstrips and Dispersed Campsites**

Neither the static nor dynamic maps provided for this RMP display backcountry airstrips or dispersed campsites. During public meetings for Scoping of this TMP, both backcountry airstrips and dispersed camping were noted by BLM staff as two of the prominent recreational uses of the Dolores TMA. The potential impact of closures for both aircraft and camping is troubling, and the omission of detail, including the precise gpx location and capacity of each campsite, within the static and dynamic Scoping maps makes it impossible difficult to determine the relative potential impact of route closures for these uses.



For camping specifically, the scope of negative impact on the American public from omission of display of dispersed campsites within TMP maps is vast. The prevalent majority of visitors to the Dolores TMA utilize camping as a primary and preferred mode of overnight accommodation. Eradication of dispersed camping will subsequently eliminate affordable and practical means for the American public to spend extended time exploring and appreciating the unparalleled beauty, unique cultural and natural resources, and internationally renowned outdoor recreation opportunities that are held within this area. Restriction or closure of dispersed camping creates economic harm for members of the American public who cannot afford to pay for accommodations outside of the TMA. Omission of dispersed campsites within TMP maps demonstrates intentional misleading by planning managers to accurately disclose and inform the public of the full range of impacts within the forthcoming draft TMP, and thereby obfuscates members of the public from conducting accurate Scoping-level evaluation of the draft TMP, to provide relevant comments throughout the planning process. **We request that you depict on the Interactive Maps all Dispersed camping areas, as well as the impacts by each Alternative you define.**

#### **RS. 2477 and Mining Claim Access Routes**

The TMP will provide bearing on and addresses the validity of R.S. 2477 assertions. It is critical that the TMP must not reduce access or close completely any routes that are the means of access to active mining claims. Rights of way that access mining claims are granted rights under R.S. 2477.

MS-1626 Travel and Transportation Management Section 6.2 states, “A travel management plan is not intended to provide evidence, bearing on, or address the validity of any R.S. 2477 assertions. R.S. 2477 rights are determined through a process that is entirely independent of the BLM's planning process.

In these proceedings, whether routes have existed historically and whether they currently exist on the ground are part of the evidentiary record for R.S. 2477 claims. Closure of an R.S. 2477 route through a TMP planning process provides bearing against the validity of any R.S. 2477 assertion by erasing the primary source of evidence upon which these assertions rely: the continued existence of the route itself. As such the closure of R.S. 2477 routes through the TMP process violates MS-1626 (6.2).

We recognize that RS 2477 claims cannot be adjudicated through an administrative process, but we also recognize that closing R.S. 2477 routes through an administrative process will bias any future adjudication, and closures of these routes should be avoided at all costs until any contested





route can be thoroughly adjudicated. **At minimum, BLM should develop a TMP alternative that keeps all of these routes open.**

The closure of R.S. 2477 routes also creates an undue burden on active mining operations, and BLM Manual 2801.8(G) requires BLM to “Recognize as an authorized use, any ROW facility constructed on public land on or before October 21, 1976, under the authority of any act repealed as to future authorization by FLPMA. No further authorization is required by the holder for [...] b. A ROW for a public highway constructed on public land under R.S. 2477.” The closure of routes that provide the sole access to valid mining claims is illegal.

**In order to provide substantive comments on routes that may be affected by R.S. 2477 claims after the adjudication is determined, Routes with R.S. 2477 claims must be included in the static TMP map, and especially, as a layer in the dynamic Interactive Map.**

There are many mining claims within the Dolores TMA. This region, like many other parts of the western United States, has a history of mineral exploration and extraction. Mining activities in the Dolores TMA primarily focus on minerals such as uranium, vanadium, and other valuable resources found in the area. The presence of mining claims and activities directly affect land use and recreational opportunities. It is unreasonable and unacceptable that mining sites and the routes affiliated with access to those sites are not shown in the static and dynamic maps for Scoping of this TMP. The BLM maintains records of both active and inactive mining claims, including all details such as claim locations, claim holders, and the types of minerals being extracted. This is information that is easily accessible and useable by the BLM for including in both Scoping and Analysis of this TMP.

**In order to comply with NEPA requirements, the BLM must provide maps of sufficient quality to allow members of the public to identify landmarks, areas, and designations on areas that are contained within the full range of the TMA, along with details regarding potential impacts to public access and multiple uses. It is critical that the TMP planning team provide comprehensive and complete maps for public review that include all of the details specified in this comment letter.**

### **FIRST AMENDMENT RIGHTS**

The BLM needs to strongly consider the American public’s Constitutional rights when crafting alternatives for this TMP. The First Amendment protects the right of groups to gather and have organized rides where we educate each other on ways to best enjoy our preferred choice of recreation. It also specifically provides that Congress make no law respecting an establishment or



religion or prohibiting its free exercise. Limiting routes could be violating those rights. It would be inappropriate and unlawful for the BLM give preferential treatment to any user group over another. The reality is, the BLM can implement active management for all types of recreation within the Dolores TMA. Motorized and non-motorized users can co-exist; one should not be restricted to accommodate another.

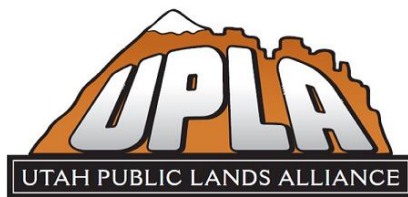
### **POTENTIAL NEGATIVE IMPACT ON OUTSTANDING MULTIPLE-USE VALUES & CUMULATIVE IMPACTS**

The [National Environmental Policy Act](#)<sup>6</sup> (NEPA) plays a critical role in preventing cumulative impacts from closures and restrictions to public access on public lands by ensuring comprehensive environmental reviews and public involvement in decision-making processes. NEPA requires federal agencies to prepare an Environmental Impact Statement (EIS) for major federal actions significantly affecting the quality of the human environment. For less significant actions, an Environmental Assessment (EA) is prepared to determine whether an EIS is needed. Both documents must consider the cumulative impacts of the proposed action in conjunction with other past, present, and reasonably foreseeable future actions. Cumulative impact analysis ensures that the effects of land closures and restrictions are evaluated not in isolation, but in the context of other actions that might compound their environmental and social impacts.

#### **Outstanding Recreation Value: OHV Recreation**

UPLA is concerned that future restrictions and closure of OHV access in the Dolores TMA will bear insurmountable negative impact on OHV recreation. This negative impact will directly affect our members and the communities and economies that are situated near the Dolores TMA and throughout the greater Southwest region of the United States. Closures and restrictions of access will displace OHV riders. This will drive OHV enthusiasts to seek recreation in other areas of Utah and the American Southwest. This will create a higher concentration of people off-roading in other OHV areas, which will create new negative impact on natural and cultural resources in those areas, thus jeopardizing the long-term viability of other OHV areas, and thereby inflicting a snowball effect of harm directly on the OHV recreation community.

While anti-motorized groups will no doubt emphasize in their comments that recreation is subservient to preservation of natural and cultural resources, we note that the Dolores TMA supports a booming travel and tourism sector that is a source of economic opportunity for local communities. This coincides with a plethora of economic and demographic regional data. The outdoor recreation and tourism sector is a significant source of employment in Grand County. A [report by Headwaters Economics](#)<sup>7</sup> indicated that in 2018, travel and tourism-related jobs

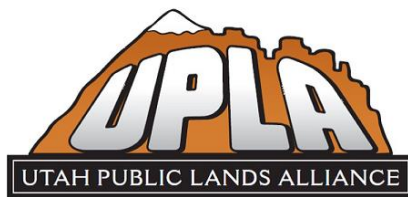


constituted around 45% of total employment in Grand County. Employment sectors include lodging, dining, retail, and various recreation services, which are all bolstered by the influx of tourists. [Grand County has experienced population growth in large part due to its reputation as an outdoor recreation hub](#)<sup>8</sup>. Many local businesses thrive on the influx of visitors seeking outdoor activities. This includes OHV sales and rentals, OHV tour operators, OHV repair shops, outdoor gear sales and rental shops, and guided adventure services.

The importance of OHV recreation to the local economy is undeniable. Moreover, the motorized route network in the Dolores TMA is what enables all other recreational activities in the TMA to take place. Much of the terrain is remote, and many areas can be accessed only by primitive four-wheel-drive roads. Driving these roads is in itself a valued recreational experience for many people, while others use them to access hiking trailheads, climbing sites, campsites, or cultural sites. A robust motorized route network is key to enabling all forms of recreation, whether those participating in a given activity appreciate that or not.

**Given the long management history of the motorized routes in this area and their extreme importance to the local economy in enabling all forms of recreation within the TMA, any significant closures of motorized routes proposed in the TMP are simply unwarranted. We therefore urge the BLM to consider and adopt the following provisions in the TMP:**

- 1. Keep all existing OHV area designations from current management plans.**
- 2. Maintain existing decisions regarding wilderness, wilderness study areas, and lands with wilderness characteristics.** The existing management plans carefully evaluated what lands were suitable to manage for the protection of wilderness characteristics and those that were not. Those that were determined to be managed as BLM natural areas were without roads and already managed for non-motorized recreation. Lands determined not to be managed for wilderness characteristics had that determination because those lands were found to have other important resources or resource uses that conflict with protection, preservation, or maintenance of the wilderness characteristics. Designating additional lands with wilderness characteristics as BLM natural areas closed to OHV use would disrupt the existing careful balance made in previous planning efforts and would have a severe negative effect on multiple forms of recreation and other valid existing rights.
- 3. Maintain all individual route designations under existing travel management plans.**



4. **Utilize an adaptive management framework for motorized use.** As part of implementation-level travel planning, active management should include monitoring OHV use areas and, if unacceptable impacts to natural and cultural resources are occurring, develop implementation-level limitations including route designation, route closure, motorized vehicle size and weight limitations, or other mitigation measures as necessary to address those impacts. Any route closures or other management measures should be developed in response to specific unacceptable impacts identified through monitoring, not done preemptively based on pure speculation. The best way to manage OHV use is with the least restrictive approach first, leaving room to escalate to increased restrictions later when necessary.
  
5. **Special recreation permits for motorized events must continue to be allowed for all routes currently permitted for events.**

### **Outstanding Recreation Value: Rock Climbing**

The Dolores River Canyon, Slick Rock Canyon, and Paradox Valley are among the region's most renowned rock climbing destinations. Climbers come from around the state and the US to test themselves on the unique sandstone cliffs, highly technical slick rock, and multi-pitch routes. Restrictions or closures of access to rock climbing in the Dolores TMA effectively serves to eliminate an irreplaceable climbing experience; it decimates the ability for current and future climbers to engage in a unique climbing experience that cannot be accessed elsewhere.

It is important to note, [rock climbing as a sport embodies and advances a deep value and commitment for responsible stewardship of public lands](#)<sup>9</sup>. The Leave No Trace (LNT) philosophy stands as a beacon of responsible outdoor ethics, guiding climbers toward environmentally conscious practices that protect and preserve the very landscapes they cherish. Throughout each stage of a climbing journey – from the approach to the summit, and through the descent to camping or bivouac – these seven principles serve as a compass, guiding climbers to minimize their impact and leave behind only memories, not traces. Climbers believe that they have the privilege of experiencing some of nature's most awe-inspiring vistas, and with that privilege comes a shared responsibility to protect them. By embracing the LNT principles, climbers embark on a collective mission to safeguard the beauty of climbing areas and leave them unspoiled for generations to come.

**We urge the TMP planning team to explicitly affirm that all rock climbing routes and sites will:**



- **Be identified on the static and dynamic TMP maps, including identification of access routes (roads and trails) to each sites,**
- **Remain open within all alternatives that are proposed in the Dolores TMP.**

### **Cumulative Impacts**

It is critical that the TMP planning team represents an interdisciplinary approach. Any lack of agency representation and expertise in sociology, economics, and recreation management will likely result in a chasm of missing data and analysis to inform the TMP process and outcomes related to cumulative impacts on public access, local economies, as well as diverse social groups and stakeholders.

**Use of active management and mitigation measures must be prevalent throughout the TMP planning process and documents. While NEPA is intended to prevent cumulative impacts from closures and restrictions to public access on public lands through comprehensive environmental review processes, public involvement, interdisciplinary analysis, mitigation measures, and adaptive management strategies, the responsibility falls on the TMP planning team to adhere to NEPA mandates and therefore leverage these mechanisms to ensure that the potential cumulative effects of management actions are thoroughly considered and addressed.**

### **ECONOMIC IMPACTS**

The [National Environmental Policy Act](#)<sup>6</sup> (NEPA) also plays a critical role in preventing negative economic impacts from closures and restrictions to public access on public lands by ensuring that comprehensive economic analysis is included in environmental reviews and public involvement in decision-making processes. NEPA requires federal agencies to prepare an Environmental Impact Statement (EIS) or an Environmental Assessment (EA), both of which must consider the cumulative impacts of the proposed action on the financial and resource economies of communities that are within proximity of the related public lands addressed in an EIS or EA. Cumulative impact analysis ensures that the effects of land closures and restrictions are not evaluated in isolation, but in the context of other actions that might compound their economic impacts.

**An economic impact analysis for a TMP EA must address the following critical components to ensure a comprehensive evaluation of how the proposed plan will affect the local and regional economy.**

1. Baseline Economic Conditions



- Demographic Data: Population size, growth trends, age distribution, and other relevant demographic information.
  - Economic Data: Current economic indicators such as employment rates, income levels, major industries, and economic growth trends.
  - Tourism and Recreation Data: Existing tourism and recreation activities, visitor numbers, and related economic contributions.
2. Description of Proposed Actions and Alternatives
    - Action Alternatives: Detailed description of the proposed travel management actions and any alternatives being considered.
    - No-Action Alternative: Analysis of the baseline scenario where no changes are implemented.
  3. Direct Economic Impacts
    - Visitor Spending: Projected changes in visitor spending due to the proposed actions (e.g., changes in access to recreational areas, new facilities).
    - Employment: Changes in local employment related to tourism, recreation, and other affected industries.
    - Business Revenue: Impact on local businesses, particularly those dependent on tourism and outdoor recreation.
  4. Indirect and Induced Economic Impacts
    - Supply Chain Effects: Impact on suppliers and service providers linked to the primary industries affected by the TMP.
    - Multiplier Effects: Broader economic effects stemming from changes in spending patterns and income distribution in the local economy.
  5. Fiscal Impacts
    - Tax Revenue: Changes in local and state tax revenues, including sales tax, property tax, and other relevant taxes.
    - Public Services and Infrastructure: Impact on public services such as emergency response, road maintenance, and infrastructure improvements or requirements.
  6. Social and Community Impacts
    - Quality of Life: Effects on the quality of life for local residents, including changes in recreational opportunities and potential increases in traffic or noise.
    - Cultural and Historical Resources: Impact on culturally significant sites and historical resources.



#### 7. Environmental Justice

- **Affected Communities:** Identification of low-income or minority communities that may be disproportionately affected by the TMP.
- **Impact Analysis:** Evaluation of how economic changes might impact these communities differently compared to the general population.

#### 8. Mitigation Measures

- **Impact Mitigation:** Proposed measures to mitigate negative economic impacts and enhance positive outcomes.
- **Monitoring and Adaptation:** Plans for monitoring economic impacts over time and adapting management strategies as necessary.

#### 9. Stakeholder Engagement and Public Input

- **Consultation Process:** Description of stakeholder engagement, including consultations with local businesses, community groups, and other relevant stakeholders.
- **Public Comments:** Summary of public comments received during the EA process and how they have been addressed in the economic impact analysis.

#### 10. Data Sources and Methodology

- **Data Collection:** Sources of economic data used in the analysis, such as government reports, surveys, and industry studies.
- **Analytical Methods:** Description of the methods and models used to estimate economic impacts, such as input-output models, econometric analysis, and economic multipliers.

**The vast majority of TMPs that have been produced by the BLM for public lands in Utah over the last decade have been woefully remiss to include adequate analysis of economic impacts. This represents both legal and procedural violation of NEPA process. It is essential that the TMP planning managers for the Dolores TMP must include a comprehensive analysis of economic impacts for the Dolores TMA in order to demonstrate how the proposed actions will affect the local and regional economy, allow the public an opportunity for relevant public comment on such impacts, and thereby support TMP decision-makers in balancing environmental and economic considerations.**

**EQUITY, ENVIRONMENTAL JUSTICE, AND PEOPLE WITH DISABILITIES NOT ADDRESSED IN RMP ALTERNATIVES AS PER E.O. 13085 AND E.O. 14035**



In his first two months in office, President Joe Biden issued Executive Order(s) [13085](#)<sup>18</sup> and [14035](#)<sup>19</sup> On Advancing Racial Equity and Support for Underserved Communities Through the Federal Government. These executive orders established “an ambitious whole-of-government equity agenda” which focuses on addressing “entrenched disparities in our laws and public policies,” and mandates a “comprehensive approach to advancing equity for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality.” In the fall of 2021, the Department of Interior subsequently published a notice in the Federal Register seeking comments on how to provide more equitable access to public lands, which it has identified as an important goal of this administration.

Under these executive orders, “The term ‘equity’ means the consistent and systematic fair, just, and impartial treatment of all individuals, including individuals who belong to underserved communities that have been denied such treatment, such as ... persons with disabilities....” Historically, there has been no group more greatly marginalized and excluded by public land management policies, and motorized travel management policies in particular, than people with disabilities. Outdoor enthusiasts with ambulatory disabilities frequently rely on motorized travel as their sole means to enjoy recreating on public lands. Not everyone has the ability to hike into a remote wilderness area, but many such people are still able to drive Jeeps, side-by-sides, and ATVs, which are restricted to the designated motorized route network.

Travel management policies focused on “minimizing” the environmental impacts of motorized recreation have resulted in a dramatic decrease in motorized recreation opportunities on public lands over the last 20 years which has disproportionately impacted people with disabilities. Wilderness focused environmental groups with extreme ableist biases have pushed for more and more areas to be closed to motorized recreation and reserved exclusively for hikers, mountain bikers, and other “human powered” and “quiet use” forms of recreation in which many people with disabilities are unable to participate.

Every time motorized routes are closed, people with disabilities that require the use of motorized means to access public lands are barred from those areas forever. There has been little recourse for such people in the past because the Americans With Disabilities Act does not require public land management agencies to consider disproportionate effects on the disabled community, but only requires that they be given access to public lands on equal terms with everyone else. As a result, the BLM has historically failed to give any real consideration to the impacts of motorized route closures on the disabled community when developing travel management plans.

The Biden Administration’s focus on equity, however, changes the equation. While the ADA focuses only on equality of opportunity, equity inherently focuses on equality of outcome. Any





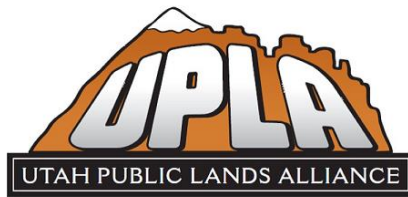
policy that is facially neutral but disproportionately harms a disadvantaged or marginalized group is considered inequitable. The BLM is therefore required by this executive order and others mandating that federal agencies consider “environmental justice” in NEPA proceedings to consider whether any restriction or closure of OHV access imposed by the Dolores TMP would disproportionately harm disabled users’ ability to access public lands.

Senator Mike Lee introduced the Outdoor Americans with Disabilities Act into Congress recently on June 13, 2024. This act will preserve access for users that are impaired by disabilities, including our nation’s veterans. The introduction of this bill, in addition to President Biden’s Executive Orders, demonstrates the public interest in achieving equity of access for these individuals. It is imperative that the BLM consider the access needs of disabled users in considering the alternatives for this travel plan and ensure that people with disabilities who depend on motorized means do not lose access. Such consideration is also required by the BLM’s recently adopted Equity Action Plan that was released by the Department of Interior in April 2022. The Equity Action Plan recognizes that off-road routes create a form of access to public land for those with disabilities, and specifically identifies limited physical access as a barrier that prevents people with disabilities from recreating on public lands. Limiting the areas motorized vehicles can access limits those users who want to experience public land and contradicts the agency's Equity Action Plan. Therefore, **BLM should analyze how the proposed closures would undermine the objectives of the Equity Action Plan.**

I (Loren Campbell) personally am affected because I am 68 years of age and have been a Type 1 diabetic in excess of 30 years. I can no longer visit these scenic areas without the benefit of motorized vehicles. My husband has been as asthmatic since childhood, and he also may be deprived of the opportunity to visit these lands without motorized vehicles.

Any approach to travel management that presumes the superiority of non-motorized forms of recreation like hiking over motorized recreation, or that justifies closing motorized routes on the basis that people can still hike on those routes, is inherently discriminatory toward people with disabilities. Any large-scale closures of existing routes would unfairly and inequitably deprive people with disabilities of the ability to recreate in the area using the only means available to them.

We note that, anecdotally, a significant and growing number of racial minorities (especially Latinos) have recently been getting involved in motorized recreation driving side-by-sides and UTVs. From personal observations while off-roading in both Colorado and Utah, a significant proportion of UTV drivers are Hispanic. These vehicles seem to appeal to that demographic in ways that traditional off-road vehicles or other outdoor activities like hiking or mountain biking



historically have not. Motorized recreation (specifically OHV use) is therefore playing a major role in diversifying recreation on western public lands, which is one of the primary goals of the DOI's Equity Action Plan. Eliminating a significant amount of motorized recreational opportunities in the Dolores TMA therefore runs counter to this goal and disproportionately affects racial and ethnic minorities who prefer motorized recreation over other forms of outdoor recreation. For that reason as well, the action alternatives presented in the draft RMP are broadly overreaching towards conservation and should be rejected or scaled back to a more balanced approach that allows for both conservation and outdoor recreation access to be protected for perpetuity.

Many of UPLA's members and supporters are made up of individuals that are elderly, handicapped in some way, or suffer from physical mobility challenges, and cannot access public lands because of their limitations without the benefit of motorized vehicles.

**The Dolores TMP must include compliance with Executive Orders 13985 and 14035 on Advancing Racial Equity and Support in the list of regulations and laws that the TMP must address, and address how the BLM will achieve compliance if there should be any proposed limits or closures to motorized access in the Draft EA.**

### **CONFORMITY WITH UTAH STATE LAW**

The TMP should be in conformity with Utah State laws, especially 2024 H.B. 471 and S.B. 67. Compliance with State laws should be a stated objective of the TMP. In the event that BLM chooses not to comply with State law, an explanation should be included in the TMP.

### **EDUCATION**

BLM should analyze the educational resources utilized to inform the public about the TMA. Evaluate resources that are under utilized, and how BLM will address improving that public education. Items to consider might be informational signing, BLM trail talks, trail signage, resource impacts, responsible use, leave no trace practices, and the importance of protecting natural and cultural resources.

### **CURRENT MANAGEMENT**

BLM should include their current applicable Resource Management Guides in the EPlanning website data. Where the TMA is not being managed in accordance with applicable BLM



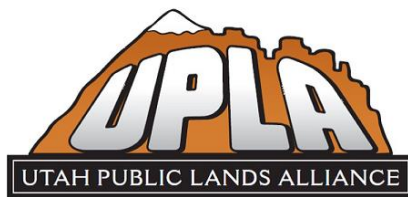
Management Guides and or handbooks, these should be identified by BLM as discrepancies in their management, and identify corrective actions they propose or the need to change the Guide. A thorough report on the monitoring done currently in the TMA should be included in the Draft EA, including data and sources on route usage such as counters installed on trails.

### **SAFETY IMPACTS LEADING TO IRREPARABLE HARM**

As a former certified EMT and Wilderness First Aid Caregiver, I (Loren Campbell) have been well acquainted with The Golden Hour for treatment of critical injuries or illnesses has been a practice since it was introduced by the French in WWI. More recently, medical professionals have said that the hour should be shorter or longer depending on the circumstances, but “as soon as possible” has remained a good guide.

As I am frequently a trail leader for groups, one essential part of my preparation is planning for an emergency exit for medical and other reasons. I have been presented with all of the following emergencies on routes that I have been on, and quick exits to seek advanced medical care or extraction points was essential.

- A simple fall by a club member shattered both knees on a trail near Silverwood Lake in California. Due to the excruciating pain and risk of internal bleeding, I splinted both legs and evacuated him in the back of a Jeep to a waiting ambulance on the highway using the quickest and smoothest of available route choices.
- Twice on the Dusey Ershim Trail in California, we had members that began having chest pains, difficulty breathing and dizziness. We evacuated one back to advanced medical care. He was diagnosed with severe altitude sickness, the only field remedy was moving him to a lower altitude as quickly as possible, which is what we did. The other member we hydrated and put to bed and he adjusted to altitude overnight.
- On another Jeep trip to Johnson Valley in California, a member of our group was bitten by a rattlesnake. After driving with OHV to reach a cell signal, we contacted 911 and arranged evacuation to a suitable landing site for helicopter transport for treatment for advanced medical care at a hospital with the needed anti venom. Without motorized OHV to quickly reach cell reception and to arrange expedited emergency evacuation and treatment, that member would have suffered irreparable harm possibly including death.
- A passenger on a UTV run in Parker, AZ and had a panic attack as a result of getting lost, running low on fuel and water, and darkness setting in. The other members were eventually able to calm him down somewhat and evacuated him. This was the first time he had a panic attack, but the attacks became prevalent and more severe over the next



year. He committed suicide one year later as a result of the attacks. Not sure if quicker treatment might have made a difference, but it was a tragic loss.

- A Jeep member was on a run in Havasu, AZ and had a heart attack. We began CPR and contacted EMS who we met at the highway and drove to the patient. Unfortunately, efforts were unsuccessful and the member died, but at least because of OHV we were able to expedite arrival of EMS.
- On a Jeep run in Big Bear, CA we saw a mountain biker collapsed on the side of the road. We verified his vitals were good and called 911. It was very hot, almost 100°. He was severely dehydrated, so after he regained consciousness we got him in an air conditioned Jeep and started dousing him with water to cool him down and started rehydration. We drove him to a fire station about 6 miles away where EMS and an ambulance was waiting, who took him to a hospital for advanced medical care.
- There are many other common medical conditions I have not experienced, but happen everyday. Expedited medical care, even if it is just a scoop and run, generally increases the chances of recovery.
- Other emergencies such as threats by fire or flood also are enhanced with motorized OHV in expediting evacuation.

Often the shortest, or the route you came in on, are not the best routes for evacuation. Having a multitude of route choices is often the very best way to expedite evacuation and recovery. I have had a variety of emergency experiences in my life, but it pales in comparison to the number of actual issues that arise in daily life. Closing routes WILL increase evacuation, treatment delays, and even survivability. **Human life and safety should be considered carefully in your decisions. For every route the draft TMP may propose to close, a comprehensive analysis must be provided that evaluates how these factors will affect response to emergencies for evacuation and recovery.**

### **TRANSPARENCY AND EASE OF SUBMITTING COMMENTS BY PUBLIC**

Many of our members and supporters have expressed considerable frustration and difficulties being forced to use the ePlanning website to submit comments. Both BLM and UPLA have been emphasizing the importance of more substantive comments, but the Participate Now link makes it much more difficult..

- The Participate Now link often takes 10-15 seconds to appear when accessing the page, many people abandon the site before it appears, and occasionally the link does not work
- There is no “Help” option on the Participate Now page for people having difficulty.
- Deep linking to the Participate Now Comment page is not supported



- The 5000 character limit for comments is inadequate to support substantive comments, my comments nearly 8000 words without any attachments.
- The file types do not support adding gpx or kmz files which are the most commonly used
- There is no ability to simultaneously copy other organizations or elected officials in comments so that they are aware.
- Mailing comments is impractical, especially when photos are included.

**We urge that BLM offer the option of submitting comments by a dedicated email address as they have in the past.**

### **DISSENTING OPINIONS**

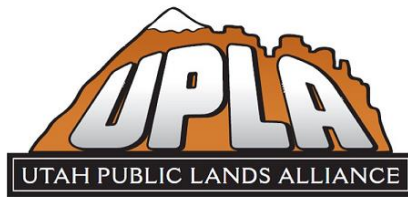
Dissenting opinions on individual route decisions are inevitable when the Interdisciplinary Team goes through the planning process, but if a IDT team member presents a specific report or study that would support a different decision, **we ask that BLM specifically identify these reports in the supporting documents as Dissenting Opinions.**



## CLOSING

In addition to our preceding comments, we support any additional comments from individuals, groups, associations, and the general public that encourage the BLM to adhere to the Congressionally-mandated NEPA directive that requires a true recreation alternative as an additional option for public comment. We support any additional comments that encourage the agencies to uphold their mission and commitment to the public to manage public lands in the Dolores TMA in a manner that maximizes public access, and sustains the health, diversity, cultural resources, and values of the land for the use and enjoyment of present and future generations. We strongly advocate against any components of the TMP that would diminish or eliminate public access to the Dolores TMA

We would like to close by once again calling your attention to the rights and interest that UPLA members, all outdoor recreationists, and the general public have as vested stakeholders of the BLM-managed lands. We encourage the BLM to uphold their alignment with the BLM mission and operating guidelines, their responsibility to manage our public lands for the benefit of all American citizens, and their accountability to operate within the scope of congressionally-granted boundaries as contracted managers of our nation's public lands - the citizenry's prized national heritage.



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](mailto:rose@utahpla.com)

Sincerely,

*Rose Winn*  
Rose Winn  
Natural Resources Consultant  
Utah Public Lands Alliance  
559.862.6382

*Loren Campbell*  
Loren Campbell  
President  
Utah Public Lands Association  
909.499.3295

cc: Senator Mike Lee, Senator Mitt Romney, Congressman John Curtis, Congresswoman Celeste Malloy, Congressman Blake Moore, Congressman Burgess Owens, Governor Spencer Cox, Redge Johnson, Laura Ault, UPLA Trustees and Members

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