



Date: August 14, 2025

Bureau of Land Management, Richfield Field Office
Attn: Beas Lewis Flat Campground
150 E 900 N
Richfield, Utah 84701

Via Submission on ePlanning: <https://eplanning.blm.gov/eplanning-ui/project/2039774/510>

RE: Beas Lewis Flat Campground, Scoping (DOI-BLM-UT-C020-2025-0025-EA)

Dear BLM Planning Team,

Utah Public Lands Alliance (UPLA) is writing to provide public comment on the [Beas Lewis Flat Campground](#)¹, Public Scoping Period, hereto forward referred to with the acronym BLFC. Many of our members and supporters live near and/or recreate throughout the 2.1 million acres of public land that is managed by the Bureau of Land Management (BLM) Richfield Field Office in Utah. BLM-managed public lands throughout the jurisdiction of the Richfield Field Office, including the area of dispersed camping throughout the Beas Lewis Flat area, are treasured and frequently visited recreation destinations for the majority of our members, including the full footprint of public land that is encompassed within the planning area for the BLFC project. Thus, our members are among the millions of people who will be impacted by the outcome of the BLFC project. This letter of comment shall not supersede the rights of other UPLA agents, representatives, or members from submitting their own comments; the BLM should consider and appropriately respond to all comments received for the BLFC project.

UPLA is a non-profit organization representing over 5,800 members, in addition to speaking 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 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 Wedge and surrounding area 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 Jeoper 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, and 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 by the BLM Richfield Field Office, 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, as well as dispersed and developed camping, are appropriate.

The [BLM manages 22.8 million acres of public land in Utah](#)², representing 42% of the total land mass in this state. In Wayne County where the proposed BLFC is located, the BLM manages 891,978 acres of public land, which is 57% of all land within Wayne County. The BLFC is contained within the Henry Mountains / Fremont Gorge Travel Management Area (HMFGTMA) and surrounded by other federally-managed lands including: the San Rafael Swell, San Rafael Desert TMA, and Capitol Reef National Park; while Labyrinth Canyon TMA, Nine Mile Canyon TMA, Paunsaugunt TMA, and Trail Canyon TMA are all in close proximity. 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 the BLFC project is written, we are concerned about the 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 plan alternatives that serve to maximize the multiple-use directive, and place recreational values in equal status for optimization as all other public land values. BLFC alternatives that function to close or restrict motorized, dispersed camping, 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 BLFC plan 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 BLFC plan. 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 are readily available, is both arbitrary and capricious.

While drafting the proposed BLFC 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. The Dingell Act
3. Requirement to comply with FLPMA multiple-use and sustained-yield
4. Proposed alternatives
5. Contemplation of deference for the Conservation and Landscape Health Rule
6. Unique recreation values and site characteristics
7. Relationships between routes and species of concern
8. First amendment rights
9. Economic impacts
10. The EXPLORE Act
11. Existing trail density, dispersed camping availability, and adverse effects of proposed designated camping area



12. Potential disruption to OHV access and the need for alternative campground site analysis
13. Impacts of Vegetation Removal on Wind Erosion and Sand Transport
14. Education
15. Current management
16. Transparency and ease of submitting comments by public
17. Additional scoping recommendations

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 BLFC and surrounding HMFGTMA 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 BLFC project that would diminish or eliminate public access to BLM-managed public lands.

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](#)³ (FLPMA). The BLM is a contracted public land manager, 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](#)⁴. Per the definition of multiple use within [U.S. Code § 1702 Title 43](#)⁵, 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 BLFC project, 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 BLFC area and the surrounding HMFGTMA for organized, safe, conservation-centric recreation. This may be accomplished by ensuring that general public



access and access to a sufficient variety of no-cost and low-cost camping areas are explicitly protected through the BLFC 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 BLFC 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 EA for the BLFC project 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 to an adequate volume of both developed and dispersed camping.**

DINGELL ACT

The John D. Dingell, Jr. Conservation, Management, and Recreation Act (Pub. L. 116–9, 2019) - commonly referred to as the [Dingell Act](#)⁶ - has direct and indirect implications for dispersed camping in areas such as those across the BLFC region, which lies in close proximity to the San Rafael Swell Recreation Area (SRSRA) in Utah.

The Dingell Act was passed by Congress and signed into law on March 12, 2019, thereby creating 14 new Wilderness areas within Utah TMA and along the Green River, the majority of the 14 new Wilderness areas lie within the borders of the San Rafael Swell Travel Management Area (SRS TMA). The SRS TMA is located immediately North of the HMFG TMA, wherein the BLFC is located, near the border of the SRSRA. As a public land management designation, Wilderness represents the most restrictive form of management, wherein the public may only access the Wilderness area by foot or on horseback. No mechanized travel is permitted within Wilderness, meaning that OHV recreation, as well as use of mountain bikes and e-bikes, are completely forbidden. Consequently, the only members of the public who may access Wilderness areas are those who are physically capable of hiking, backpacking, or riding a horse; and as a result, public access to Wilderness is further restricted to those who have the luxury of time and resources to afford to be unemployed or take extended time off of work to go on a lengthy trip as is required to hike, backpack, or ride on horseback into Wilderness areas. The collective footprint of the 14 Wilderness areas designated by the Dingell Act equates to 663,000 acres – which includes a vast area of the SRS TMA. Therefore, the real impact of the Dingell Act served to minimize public access to roughly half of the SRS TMA (which is all public land) to

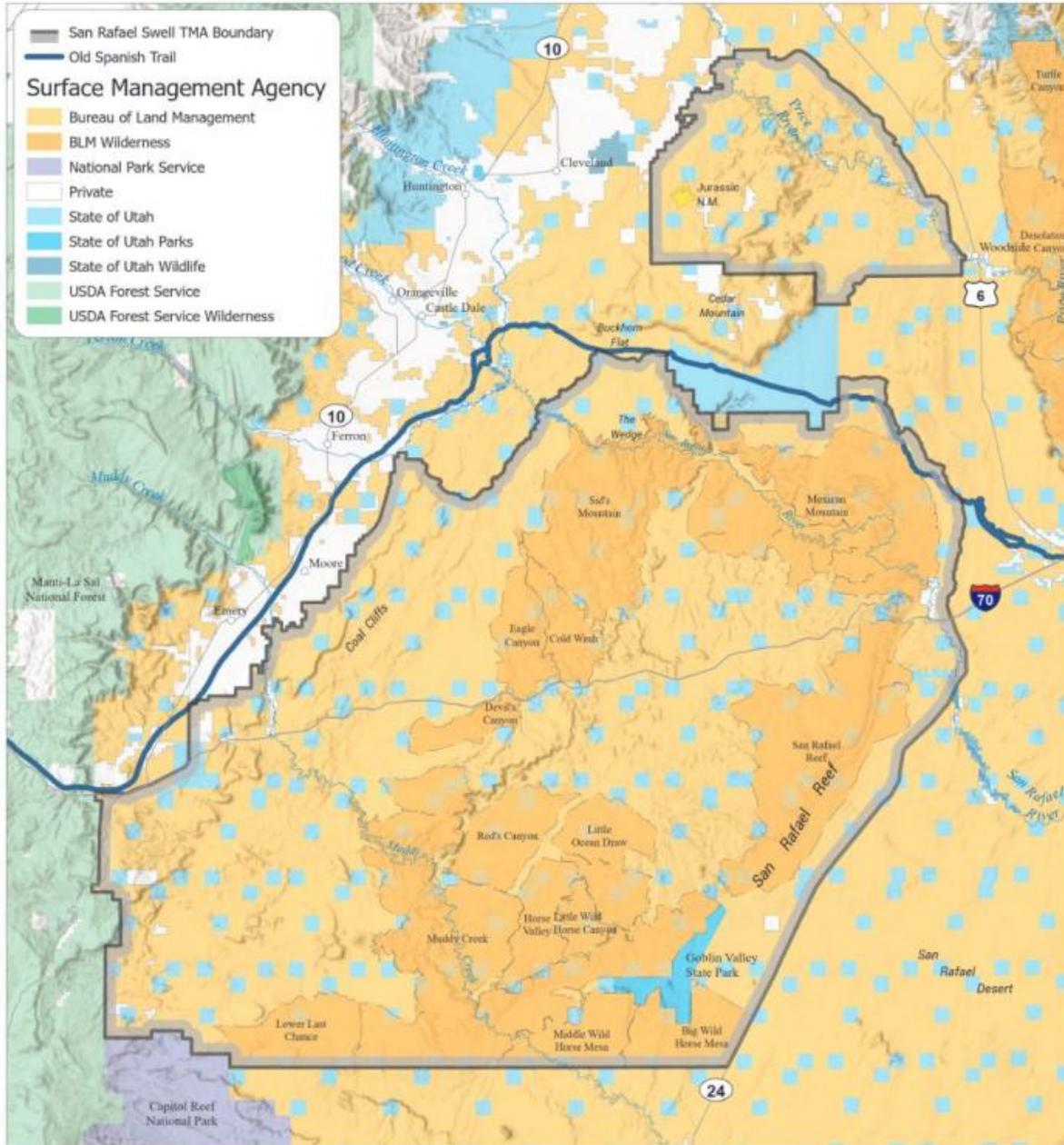


individuals who possess both the physical ability, and economic luxury, of engaging in extended hiking, backpacking, or horseback trips.

To illustrate the scale of public access restrictions that were imposed through wilderness designations in the Dingell Act, the map below demonstrates the variance of scale of Wilderness versus active-management areas within the border of the SRS TMA. All Wilderness areas are shown in dark orange shading, while active management areas are shown in light orange, and Utah State Trust Lands are shown in blue.



Designated Wilderness Areas and The Old Spanish Trail



Whereas the light orange active-management areas are the only areas within the SRS TMA in which individuals of all physical abilities and socioeconomic status retain viable access to explore and enjoy the rich natural, cultural, and recreational opportunities of these exquisitely beautiful public lands – one may quickly recognize that a solid half of the public land in the SRS TMA is forbidden to all members of the public who lack the physical ability and financial means

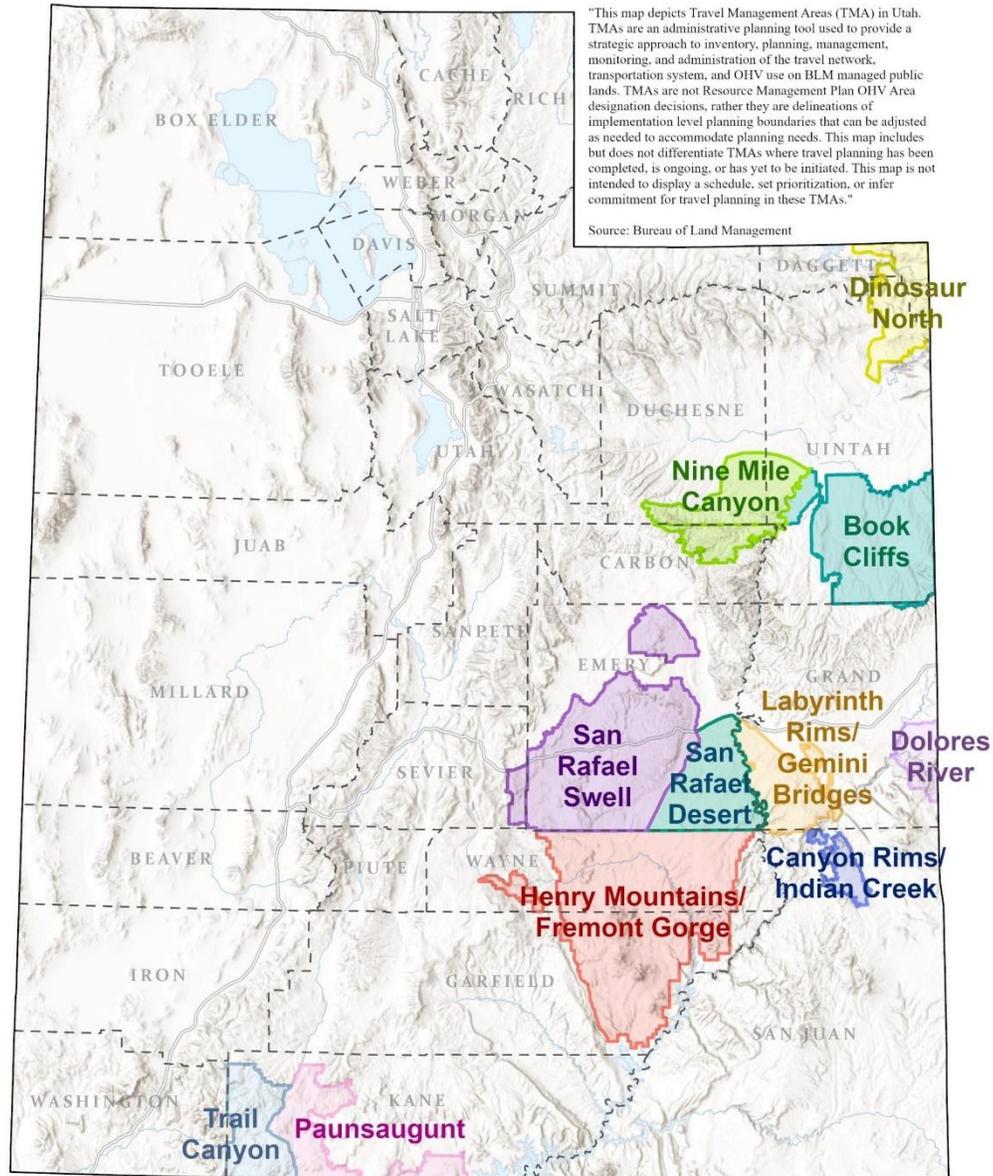


to hike, backpack, and ride horseback. This means that recreation opportunities that are accessible via motorized and mechanized means are of increased value and interest to all those who enjoy pursuing all forms of recreation within and near the SRS TMA. The closure of public access to Wilderness designated lands within the SRS TMA has pushed more users who require or enjoy motorized access to public lands, into the HMFG TMA. There is a direct correlation between the Dingell Act Wilderness designations, and increased recreational use across the HMFG TMA, including the areas used for dispersed camping in the BLFC region.

As you can see from the map below, the HMFG TMA is located immediately South of the SRS TMA.



BLM Travel Management Areas



We are subsequently concerned that the BLM is contemplating additional, substantial restrictions on public access and camping within the HMFG TMA through the BLFC project. **It is important that none of the alternatives that are presented in the Draft EA include closure or restricted access to existing dispersed camping in the HMFG TMA.** Furthermore, given the tremendous recreation value of the region, the BLM is legally and procedurally



compelled to preserve all existing dispersed camping by including a true Recreation alternative among the range of alternatives.

Within the Draft EA, it is important for the BLM to note the total acreage of Wilderness and Wilderness-affiliated designations within the HMFG TMA, and the surrounding San Rafael Swell (SRS) and San Rafael Desert (SRD) TMAs. Additionally, it is critical for the BLM to note the number and locations of existing developed and dispersed camping that are accessible by motorized and mechanized means that are located within the three TMAs noted above. This will provide the essential baseline of relevant data to allow the public to accurately assess the impact of the alternatives presented in the Draft EA when crafting substantive comments for the BLFC plan. **We recommend that the BLM provide a table and map to demonstrate explicitly the volume and location of existing developed and dispersed camping that is accessible via motorized and mechanized means across the HMFG, SRS, and SRD TMAs. The table and map should also include the acreage of land that is designated as “Lands with Wilderness Characteristics (LWC), Wilderness Study Areas (WSA), and Areas of Critical Environmental Concern (ACEC)” given that LWCs, WSAs, and ACECs are typically managed as if they are already designated wilderness.**

With the passage of the Dingell Act that created vast areas of Wilderness across the SRS TMA, reduction of road density and subsequent reduction of dispersed camping has already been achieved. It is important that there must be no further action to close or restrict access to free dispersed camping within HMFG TMA as there is no justifiable or legal reason; camping access via motorized and mechanized means has already been severely minimized across this region of Utah through the Dingell Act. To close or restrict additional camping via motorized or mechanized access routes for the purpose of reducing user density, or advancing additional minimization criteria, would be both arbitrary and capricious.

The Dingell Act created the SRSRA for conservation and “recreational opportunities, including hunting, hiking, horseback riding, and camping.” Section §1231(b) directs that the area “shall be managed in a manner that conserves, protects, and enhances the recreational, cultural, natural, scenic, and wildlife resources... while allowing for continued public access and recreation.”

Recreation Area Mandates are cited in Section §1231(d)(2). The law requires the BLM to manage SRSRA “in accordance with the Federal Land Policy and Management Act of 1976,” emphasizing multiple use and sustained yield. Importantly, dispersed camping is a historically recognized multiple-use recreational activity under FLPMA and BLM’s own definitions and guidance.



Section §1231(d)(3) also protects existing recreational uses unless they are found to cause significant, site-specific environmental harm. There is no blanket authorization to eliminate existing dispersed camping within the area. This means:

- Dispersed camping is a congressionally authorized use under the Dingell Act.
 - Any attempt to prohibit or curtail this activity would need to demonstrate specific, well-documented resource impacts and undergo NEPA analysis. Simply converting dispersed campsites into closed zones or fee-based campgrounds is not aligned with the Act’s mandate unless those sites are explicitly found to be causing serious resource damage.
- The BLM must support public access and recreation as core values of land management in this area.
 - The creation of developed campgrounds must not displace or reduce current dispersed camping opportunities, or else risk violating the Act’s intent and statutory language.
- The law implies continued and non-exclusionary access.
 - That means there’s a strong legal and policy argument to retain existing dispersed sites, and even to formally designate and sign them for better stewardship—rather than eliminate them under the guise of infrastructure improvements.

How the Proposed BLFC Plan Interacts with the Dingell Act

The current proposal as depicted in Scoping documents includes:

- New developed campgrounds (with parking, toilets, and signage)
- Designate specific campsites to improve resource management
- Reroute a section of the access road to improve traffic flow
- No clear plan to preserve existing dispersed camping; in fact, closures are imminent by establishing a large area that would be exclusively for designated campsites

This raises significant concerns when measured against the Dingell Act:

- If dispersed camping areas are closed or reduced:
 - The BLM would risk acting contrary to the Dingell Act, which emphasizes continued recreational access and does not mandate developed camping as a replacement for traditional, dispersed use.
 - The plan would decrease user diversity by excluding those who rely on free, low-impact camping for backcountry recreation.
- If public access is funneled into fewer, denser sites:



- This is inconsistent with the Dingell Act’s goal to enhance, not concentrate, recreation.
- Increased density contradicts the dispersed impact model implicit in traditional use.

In accordance with the Dingell Act, we urge BLM to ensure that any recreation-related closures associated with the proposed Beas Lewis Flat Campground are strictly limited to those necessary for immediate public safety within the developed campground footprint. Title IV of the Dingell Act directs that federally-managed lands are to remain open to recreational uses such as hunting, fishing, and target shooting unless closed pursuant to a documented, transparent process. Any such closure in the project area must therefore be narrowly tailored, supported by specific safety findings, and geographically constrained to avoid unnecessary restriction of otherwise permissible uses in the HMFG TMA.

We also remind the BLM of the requirement to explicitly demonstrate project conformance with the January 15, 2025 HMFG Travel Management Plan (TMP). The TMP route network was the product of extensive public involvement and environmental review, and its designations should remain intact. **The campground’s access roads, designated camping boundaries, and supporting infrastructure must not result in the closure, reclassification, or functional impairment of motorized routes identified as open in the TMP.**

Finally, **we recommend that the proposed campground be paired with Dingell Act–aligned public access enhancements elsewhere in the TMA.** The Act’s “priority access” provisions **direct BLM to identify and improve recreational access to federally-managed lands where such access is currently constrained.** Incorporating specific commitments - such as securing legal access to currently landlocked parcels, improving trailhead facilities, or enhancing motorized route connectivity - would ensure that any localized restrictions in the campground vicinity are balanced by measurable gains in public access across the broader HMFG landscape.

The Dingell Act provides strong protections for dispersed camping in BLFC area and broader region surrounding the SRSRA. The Act mandates that:

- Recreation - including camping - must be **preserved, not curtailed.**
- Existing uses must be **retained unless clearly harmful.**
- Public access must be **enhanced, not restricted.**

Therefore, any BLM plan that reduces dispersed camping without clear, site-specific environmental justification risks violating the Act both in letter and in spirit. **We recommend that the BLM align its BLFC Plan with the Dingell Act by:**



- **Retaining and formally designating existing dispersed campsites**
- **Adding developed campgrounds to expand options, not replace traditional access**
- **Providing infrastructure (e.g., toilets, signage, hardened surfaces) to support both forms of recreation**
- **Conducting NEPA review if closures are proposed, with full public comment and alternatives analysis**

By doing so, the agency will align with statutory obligations while enhancing stewardship, protecting landscapes, and upholding the public’s right to access and enjoy their lands, just as the Dingell Act intended.

BLM REQUIREMENT TO COMPLY WITH FLPMA MULTIPLE-USE AND SUSTAINED-YIELD

Under FLPMA, BLM is directed to manage public lands “on the basis of multiple use and sustained yield” (43 U.S.C. § 1732(a)). This statutory framework requires the agency to balance a wide range of resource values - including recreation, watershed, wildlife, mineral, and cultural resources - without permanently prioritizing one use over another. The HMFG TMA exemplifies this principle, as its route network accommodates motorized and non-motorized recreation, dispersed camping, hunting, grazing, and other uses across a diverse landscape.

The proposed BLFC must therefore be developed in a manner that safeguards the full spectrum of existing recreational opportunities, particularly motorized access and dispersed camping that have been recognized as compatible uses under the TMP. Consistency with the TMP’s designated route network is not merely a matter of planning conformance; it is a legal obligation under FLPMA to avoid unnecessary or undue degradation of existing, sanctioned uses.

In addition, any safety-related closures within the campground footprint should be proportionate, clearly justified, and temporary or subject to periodic review, to ensure they do not result in de facto long-term restrictions inconsistent with FLPMA’s multiple-use intent. Likewise, pairing the campground development with tangible public access improvements elsewhere in the TMA would demonstrate BLM’s commitment to maintaining a balanced, landscape-scale recreation portfolio. Such improvements could include securing rights-of-way to eliminate public access gaps, upgrading staging areas, or enhancing signage to improve connectivity between dispersed camping areas and the motorized route network.



By anchoring the campground proposal within FLPMA’s multiple-use and sustained-yield mandates, BLM can ensure that this project enhances, rather than diminishes, the recreational diversity and accessibility of the HMFG landscape.

Preserving Dispersed Camping Areas Amid TMP-Driven Access Loss

The BLM must officially designate and preserve, in perpetuity, the existing dispersed camping areas within the HMFG TMA. Such recognition ensures compliance with FLPMA’s multiple-use and sustained-yield mandates - which require BLM to manage public lands in a manner “that will provide for outdoor recreation” and balance diverse uses for current and future generations (43 U.S.C. § 1701 et seq.).

BLM’s justification for the proposed Beas Lewis Flat Campground is based on “current high-density dispersed camping usage” – which is in fact a direct consequence of recent large-scale closures of motorized OHV routes across the HMFG TMA and multiple adjacent TMAs. According to the Public Lands Policy Coordinating Office (PLPCO) of Utah, [the HMFG TMP alone closed 612 miles of roads to OHVs, with parallel reductions in the San Rafael Swell \(665 miles closed, 141 OHV-limited\), San Rafael Desert \(534 miles closed\), and other nearby TMAs](#)⁷. **These closures severely constrict access to dispersed camping areas, pushing users into fewer remaining sites and overstressing them... effectively creating a self-imposed “need” for a new developed campground.**

This pattern of closures not only undermines FLPMA’s multiple-use directive, but also conflicts with Utah state policy, which opposes travel management plan (TMP) closures that limit sustained-yield recreation and economic benefits derived from public land use. Further, federal regulations governing travel management, including [43 C.F.R. § 8342.1](#)⁸, require BLM to designate routes and areas for motorized use in a way that protects resources, promotes safety, and minimizes user conflicts, not defaults to closures. The widespread closures across southern Utah have moved far beyond resource protection into unnecessary access restriction.

Therefore, BLM must remedy this reduction in access by:

- 1. Designating existing dispersed camping zones within the HMFG area - not simply via informal use or de-facto access - but through formal, binding designation (as “dispersed camping areas” within the TMP or RMP), so that they remain available in perpetuity, consistent with FLPMA.**
- 2. Acknowledging in the project record that campground demand stems from recent OHV closures in HMFG and adjacent TMAs, to ensure transparency and avoid**



creating a cyclical justification for further development in lieu of access preservation.

3. **Complying with all relevant statutory and regulatory frameworks**, including:
 - **FLPMA**, mandating multiple-use recreation and protection of outdoor access.
 - **43 C.F.R. § 8342.1**, requiring thoughtful designations rather than defaulting to closures.
 - **Utah state policy** (through PLPCO), which actively opposes excessive closures that diminish access and local economic benefits.

By officially protecting dispersed camping sites and addressing the route-closure–driven demand for developed campgrounds, BLM can better fulfill its FLPMA obligations and equitably manage recreation access across the broader public lands landscape.

PROPOSED ALTERNATIVES

As noted in the Scoping Document, the BLFC project presents a multi-phase plan with the stated intent to enhance visitor experience by developing up to 45 new campsites in the initial phase, rerouting an access road to improve traffic flow, and establishing an area limited to designated camping - while addressing resource damage issues from increased use. However, the plan currently includes no formal designation or signage for existing dispersed camping, explicitly states intent to close a large area surrounding the proposed developed campground to dispersed camping, and hints at additional closures of other dispersed camping in the broader region around the BLFC area. It's critical to affirm that dispersed camping should be preserved, *not* eliminated. In fact, the BLM can and should complement developed sites with well-supported ongoing dispersed camping in order to improve both ecological stewardship and community access.

The Range of Alternatives Must Address the Economic Role of Dispersed Camping

Dispersed camping supports local economies, especially in rural gateways such as the communities throughout the HMFG TMA and across Wayne County. National BLM data demonstrates:

- Over 50% of recreation visits to public lands involve dispersed camping, with users spending on gas, groceries, gear, and services.
- A recent Utah study found each dispersed site visit generated \$150–\$200 locally per stay.



Closing dispersed sites - even just a small percentage - forces thousands of visits to vanish or shift away. Near the BLFC, if just 100 dispersed sites are displaced during peak season, that's an estimated economic loss of \$15,000–\$20,000 per day in local spending.

While the BLM hasn't published site-specific visitation data for current camping usage at the BLFC area, the scoping document acknowledges significant overflow by dispersed campers. Replacing these campers with fee-based developed sites will *not* fully mitigate economic losses; instead, it risks reducing total visitor days and harming Wayne County businesses.

Public-Lands Law: Multiple-Use & Public Access

As noted above, under FLPMA, BLM lands must be managed for multiple use and sustained yield, balancing recreation, resource protection, and access. Dispersed camping is explicitly a lawful, non-commercial recreational use on public lands. Current BLM policy (e.g., Washington Office Instruction Memo 2013-36) calls for supporting dispersed recreation while protecting resources.

Designation and minimal signage of existing dispersed sites, paired with Leave-No-Trace education, perfectly aligns with both FLPMA and BLM recreation policy. Converting dispersed areas to “no camping” zones solely because of demand would be contrary to the agency’s legislative mandate.

Legal Precedence Demonstrates Illegality of Camping Closures & Restricted Access

In 2024, [City of Grants Pass v. Johnson](#)⁵ upheld municipalities’ right to ban public camping, affirming that anti-camping laws aren't constitutional punishments. However, in public-land management, entirely closing public camping is far more scrutinized - particularly under public-trust duties and FLPMA. No court has supported blanket closures of dispersed camping on BLM-managed lands; doing so would invite legal challenges for violating statutory public access obligations.

Case law such as *Earthjustice v. Iron Bar Holdings* (10th Circuit, 2025) affirms that public access - including primitive camping - is protected even via corner crossing. These decisions reinforce that BLM cannot lawfully restrict dispersed camper access without robust justification and analysis.

Risks of Concentrating Camping Spatially



Drawing campers into contained, developed facilities often increases resource pressure - compacting erosion, intensifying waste issues, increasing site conflict, and spreading damage outward. Wide-area dispersed camping naturally diffuses impacts, as campers spread over more terrain.

Furthermore, remote dispersed sites near the BLFC area are stepping stones to high-value recreation like remote hiking, stargazing, cliff climbing, and wildlife viewing. For many, truly immersive access is only possible via dispersed camping. Consolidating all camping into one area would exclude those seeking more solitude and would reduce access to nearby specialized recreation opportunities.

Alternatives Recommendations

To better serve both public access and ecosystem health, the BLM should:

1. **Formally designate and sign existing dispersed camping** areas, defining basic standards, signage, and parking turnout enhancements.
2. **Complement (not replace)** dispersed camping with new developed sites - reservable, infrastructure-rich, mixed free/fee - to absorb peak demand.
3. **Provide Leave-No-Trace education**, respecting traditions of self-reliance and stewardship.
4. **Deploy ongoing monitoring** using visitor counts and site condition surveys to adaptively manage density and impacts.

This framework honors both the BLM's multiple-use mandate and the community's economic interests while implementing modern conservation strategies. There is a myriad of economic and community benefits of maintaining dispersed camping, including:

- Retains a low-cost option for budget-conscious and traditionally oriented campers.
- Boosts local spending (fuel, groceries, guides, gear) - estimates show dispersed campers often stay off-grid, using local services less tied to developed sites.
- Supports off-peak visitation, diversifying economic benefits outside holiday seasons.
- Enhances revenue potential: well-managed developed sites generate funds that can support maintenance of nearby dispersed areas.

Closing dispersed camping risks pushing these users out of the BLFC area and HMFG TMA altogether, shifting economic benefit elsewhere.



Proposed Alternatives Must Center on A Balanced Path Forward

The BLM's proposed investment in trails, toilets, and parking offers a chance to modernize public use - but not at the expense of what makes BLFC area special. Instead, by designating existing dispersed camping, improving infrastructure, and strategically adding developed sites, BLM can:

- Protect critical natural resources through planned infrastructure and education.
- Secure diverse recreational access - from backwoods solitude to family camping.
- Maintain economic dynamism in Wayne County and beyond.
- Uphold its statutory mandate under FLPMA to promote multiple uses, recreational access, and sustained yield.

Previous legal rulings affirm that public access to these lands - not their restriction - is the law and the public's rightful interest.

To protect the BLFC area for generations to come, the BLM should keep and reinforce dispersed camping, designating and stewarding it, while supplementing it wisely. The result will provide enhanced public access, healthier landscapes, stronger economies, and fulfilled public lands stewardship.

CONTEMPLATION OF DEFERENCE FOR THE CONSERVATION AND LANDSCAPE HEALTH RULE

We urge that the Draft EA be developed according to the FLPMA defined multiple use mandate and not include Conservation as a multiple use contained in the BLM Conservation and Landscape Rule. President Trump published his intent to rescind the BLM Conservation and Landscape Health Rule on April 14, 2025, and that process is proceeding through Regulatory Review to accomplish that rescission. Significant public interest seeking rescission of the rule is also demonstrated with pending legislation in Congress, S. 530 and H.R. 1206 and more than a dozen lawsuits seeking to have the rule overturned, including those by BlueRibbon Coalition, the National Mining Association, the National Cattlemen's Beef Association, American Farm Bureau Federation, the National Rural Electric Cooperative Association, and numerous states including Utah, Wyoming, North Dakota, Idaho, Montana and Alaska.

When developing the Draft EA, we recommend that the BLM either delay issuance of the Draft EA until these actions are complete, or prepare each Alternative with options including and excluding application of the Conservation and Landscape Health Rule.



UNIQUE RECREATION VALUES & SITE CHARACTERISTICS

The current dispersed campsites around the BLFC area are some of the most desirable campsites everywhere, providing solitude and incredible views. These are hardened areas and we have observed no concern with resource damage in these campsites. If the development plan were to remove these campsites, it would be a loss that could never be experienced with displacement to a developed fee-based campground. Consideration should be given to the human environment if you are considering removing existing campsites.

The existing dispersed campsites in the BLFC region are not only beautiful, they are also already hardened and virtually free of damage. The Scoping documents for the BLFC plan has asserted that resource damage, trash, human waste, and other issues have persisted in dispersed campsites within and surrounding the area in which the proposed BLFC would be located. However, the BLM has not provided any evidence or substantiation of those claims. We assert the exigence that **the BLM must demonstrate that resource damage or public health issues are present as part of the draft EA documentation.** UPLA and affiliated partners are in the process of ground-truthing the BLM's claims of damage and poor sanitation from overuse of dispersed camping in the region. **The BLM is procedurally and morally required to provide evidence of their own claims, given that the proposed action would result in restricted access or complete closure of existing high-value dispersed camping areas.**

RELATIONSHIPS BETWEEN ROUTES & SPECIES OF CONCERN

In recent BLM plans, concerns regarding the impact of recreation on ESA-listed endangered or threatened species and other species of concern have often been cited as justification for OHV route and recreation site 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 BLFC project, 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 existing dispersed camping, proposed developed campsites, and proposed new or improved recreation infrastructure, must be clearly articulated in EA 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 both inside and outside of the HMFG TMA and the BLFC area, 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 BLFC project, 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 BLFC project, an explanation should be provided as to why. If mitigations have been attempted on public or private lands outside of the BLFC project this should also be noted with the same details as aforementioned.

FIRST AMENDMENT RIGHTS

The BLM needs to strongly consider the American public's Constitutional rights when crafting alternatives for the BLFC. 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 access to dispersed camping 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 HMFG TMA. Motorized and non-motorized users can co-exist; one should not be restricted to accommodate another.

ECONOMIC IMPACTS

The [National Environmental Policy Act](#)¹⁰ (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 an 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 plans 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 planning managers for the BLFC plan must include a comprehensive



analysis of economic impacts for the HMFG 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 decision-makers in balancing environmental and economic considerations.

EXPLORE ACT (PUBLIC LAW 118-234) AND THE NEED TO PRESERVE OHV ROUTES, DISPERSED CAMPING, AND PUBLIC ACCESS

The recently enacted EXPLORE Act (H.R. 6492; Public Law 118-234), a sweeping recreation access reform law, underscores that federal recreation infrastructure—notably motorized and nonmotorized routes, campsites, and associated access—must be preserved and enhanced, not diminished. Under Section 127(d), the Act mandates that the Secretaries of the Interior and Agriculture:

“seek to create additional opportunities, as appropriate, and in accordance with existing law, for motorized and nonmotorized access and opportunities on Federal recreational lands and waters administered by the ... Bureau of Land Management.”

Furthermore, Section 127(a) requires that the agencies maintain current, publicly available GIS-compliant maps of motorized and nonmotorized access, and update these within 5 (and 20) years of enactment.

Implications for the Beas Lewis Flat Campground Proposal:

1. Protection of Existing Access Must Be Explicitly Demonstrated

The camp’s development must not limit existing OHV or dispersed-camping access. Given the EXPLORE Act’s directive to *create additional access opportunities*, BLM must ensure that **all existing motorized routes and dispersed campsites in the vicinity remain accessible and formally designated**, and that campground infrastructure does not degrade or restrict them.

2. GIS-Compliant Mapping Is Required and Relevant

The proposal should reference and integrate current motorized and nonmotorized use maps that meet EXPLORE Act standards. BLM must verify that proposed campground boundaries, roads, and amenities do not conflict with mapped access routes. If updated maps are pending, this project should rely on the most recent datasets and respect route integrity.

3. EXPLORE Act Focus on Gateway Communities and Overcrowding Supports Balanced Access



The law aims to expand access - revitalize access infrastructure near heavily visited areas and relieve congestion. Rather than concentrating dispersed users in one developed campground, BLM should explore alternatives aligned with EXPLORE Act goals. For instance, dispersing use across multiple access points or enhancing access in less congested areas would better meet statutory intent.

4. **All Existing Recreational Infrastructure Must Be Protected**

The Act's overarching purpose is to foster and preserve recreational access... both motorized and nonmotorized. Thus, **all existing recreational sites, infrastructure, trails, routes, and campsites** - not just the developed campground - should be explicitly accounted for and protected within the project's environmental and planning analysis.

The Beas Lewis Flat Campground proposal must comply with the EXPLORE Act's mandates by preserving current access, integrating GIS-compliant mapping, and ensuring no loss of recreational opportunities.

**EXISTING TRAIL DENSITY, DISPERSED CAMPING AVAILABILITY, AND
ADVERSE EFFECTS OF PROPOSED DESIGNATED CAMPING AREA**

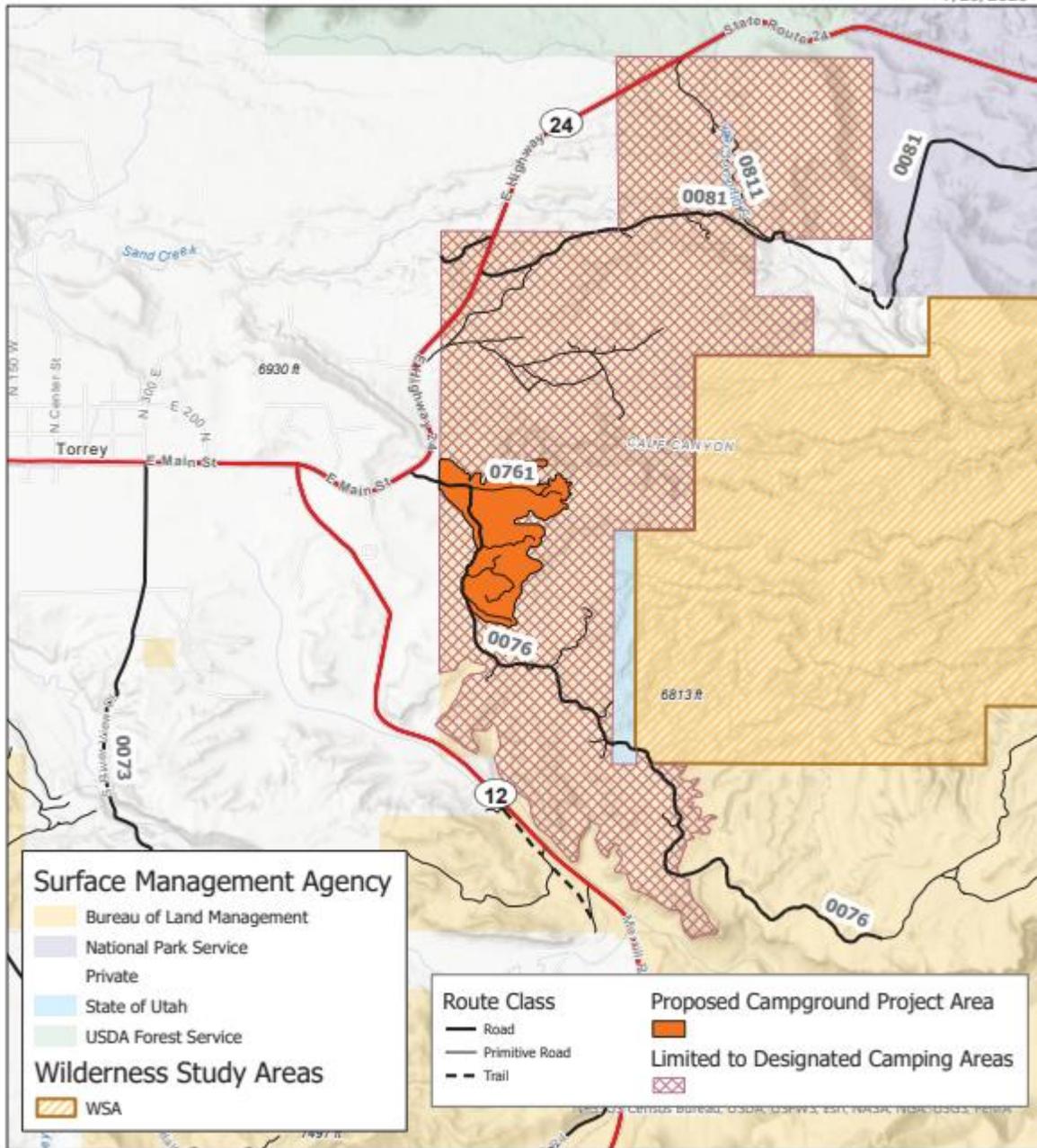
The proposed Beas Lewis Flat Campground site contains a greater density of existing motorized trails than the location identified as the "Designated Camping Area" in the project description, as shown in the map of the project site below.

Proposed Beas Lewis Campground Project

Bureau of Land Management, Utah
Richfield Field Office
150 East 900 North
Richfield, UT 84701



7/29/2025



0 0.25 0.5 1 Miles

Scale: 1:35,000

No warranty is made by the Bureau of Land Management as to the accuracy, reliability, or completeness of these data for individual use or aggregate use with other data.



Due to its proximity to existing roads, and the absence of motorized access to camping opportunities in the adjacent Wilderness Study Area, this location already supports a substantial concentration of existing dispersed campsites. These sites currently accommodate the prevailing volume of recreational use without the need for additional development or restrictions.

Creating a “Designated Camping Area” surrounding the proposed campground would unnecessarily concentrate users into a smaller geographic footprint, reducing the total availability of dispersed camping opportunities. Such a restriction would displace existing users and force them into other dispersed camping areas across the Henry Mountains–Fremont Gorge (HMFG) Travel Management Area (TMA). The inevitable result would be elevated user volume in other locations, increasing the likelihood of user conflicts and accelerating resource impacts in those areas. This outcome is both unnecessary and unacceptable and does not constitute a viable or responsible “management solution.”

As noted previously in this comment letter, this approach conflicts with multiple statutory and regulatory mandates, thus we reiterate with emphasis that the BLFC plan must comply with:

- **Federal Land Policy and Management Act (FLPMA), 43 U.S.C. § 1701(a)(8) & § 1732(a)** — Requires BLM to manage public lands “in a manner that will protect the quality of...recreational values” and “provide for outdoor recreation” within a multiple-use, sustained-yield framework, avoiding unnecessary or undue degradation.
- **BLM Travel Management Regulations, 43 C.F.R. § 8342.1** — Require that route and area designations for motorized use “minimize conflicts among various uses” and “consider the needs of all types of recreation users.”
- **John D. Dingell, Jr. Conservation, Management, and Recreation Act (Public Law 116-9, Title IV)** — Establishes a default policy that federal lands remain open to recreational uses, including motorized access and camping, unless formally closed for specific, documented reasons.
- **Utah Code § 79-6-601 et seq. (Public Lands Policy)** — Directs state policy to secure and protect motorized and dispersed camping access on public lands, and to oppose unnecessary restrictions that reduce access for recreational and economic benefit.
- **Local County Travel and Access Plans (Garfield and Wayne Counties)** — Identify motorized travel and dispersed camping as important components of the local recreation economy and seek to preserve these opportunities on public lands.

Restricting dispersed camping in an already high-use, high-access area with an established network of trails will not reduce overall recreational pressure... it will merely redistribute it in ways that exacerbate management challenges and resource damage elsewhere. The



more effective and legally consistent approach under FLPMA, 43 C.F.R. § 8342.1, and applicable state and local policy is to preserve the current dispersed camping capacity in the Beas Lewis Flat area while managing for responsible use through education, voluntary compliance measures, and targeted enforcement where necessary. Thus, we recommend that the BLM remove the proposed Designated Camping Area from the BLFC plan entirely.

POTENTIAL DISRUPTION TO OHV ACCESS AND THE NEED FOR ALTERNATIVE CAMPGROUND SITE ANALYSIS

The proposed Beas Lewis Flat Campground presents a significant concern: by concentrating dispersed camping in its immediate vicinity, OHV access through and beyond the area may become congested, increasing user conflicts and undermining access continuity across the TMA. This concentration of campers at a single point could create bottlenecks on motorized routes, impede access to surrounding areas, and reduce overall access quality.

Under NEPA, BLM must rigorously analyze the environmental consequences of its proposals - including human and recreational impacts - and consider all reasonable alternatives. 40 C.F.R. § 1502.14 mandates the agency to “rigorously explore and objectively evaluate all reasonable alternatives,” and identifies the alternatives section as “the heart” of an EA or EIS. The Ninth Circuit has underscored that omission of a viable alternative undermines NEPA’s integrity as a procedural safeguard.

BLM’s NEPA Handbook confirms that EAs must describe the purpose and need, the affected environment, alternatives considered, and potential impacts - including mitigation measures to minimize negative effects on recreation and access.

Beyond NEPA, FLPMA’s multiple-use and sustained-yield mandates (43 U.S.C. § 1732(a)) require BLM to manage lands so as to provide for outdoor recreation and avoid undue restriction of valid uses... including OHV access. The HMFG TMP, developed through NEPA processes, is intended to balance access with resource protection. Any project that potentially disrupts motorized access or alters recreational patterns within the TMP area heightens the need for thorough evaluation.

Utah’s Public Lands Policy Coordinating Office (PLPCO) states that BLM must evaluate access needs “in conjunction with BLM’s legal mandate to protect natural and cultural resources,” and that the state opposes closures that erode access.



Given these legal and policy obligations, the Draft EA must:

1. **Analyze how OHV and dispersed camping access would be affected by concentrating users at the developed campground - including impacts on traffic flow, user conflicts, and access to adjoining lands.**
2. **Consider reasonable alternatives, such as:**
 - **Locating the campground in a less disruptive site with lower OHV traffic volumes;**
 - **Spreading campsite locations more evenly rather than centralizing them;**
 - **Enhancing dispersed camping access in nearby areas to offset potential access constraints.**
3. **Assess mitigation measures - such as designated OHV circulation patterns, expanded staging areas, or directional signage - to prevent campground-driven congestion from undermining broader access.**

Failure to analyze these impacts or evaluate less-constrictive alternatives could render the EA noncompliant with NEPA, FLPMA, and Utah policy.

IMPACTS OF VEGETATION REMOVAL ON WIND EROSION AND SAND TRANSPORT: NECESSITY FOR ANALYSIS IN EA

The proposed developed campground plan would involve significant vegetation and ground cover removal—yet the Draft EA must include a thorough analysis of the potential for increased wind erosion and blowing sand, especially given the area’s arid, unstable soils. Even small patches of vegetation dramatically reduce wind-driven sediment movement by anchoring soil and intercepting wind, and their removal can rapidly destabilize the surface.

- Vegetation significantly suppresses aeolian (wind-driven) sand transport. Scientific consensus shows that even modest vegetative cover (as low as ~15%) can effectively stop sand movement, while removal dramatically increases sediment flux.
- Experimental studies demonstrate exponential increases in sand flux following vegetation removal. In one controlled field study, areas cleared of vegetation saw sand flux increase by 130× in one plot and 573× in another, compared with vegetated controls.
- Disturbed, sparsely vegetated lands are highly susceptible to blow-outs and shifting sands. A BLM Environmental Assessment for a Sand Hills area noted that “Disturbed areas and those with minimal vegetation are at high risk due to shifting sands. Blow-outs are common in disturbed areas.”



- General erosion science confirms that vegetation shelters soil from wind, reducing erosion. Removal of plants increases rates of surface erosion across landscapes, particularly in arid and semi-arid ecosystems.

Legal and procedural mandates require that BLM evaluate these risks:

- NEPA (via DOI's 516 DM 11 and BLM's NEPA Handbook) obligates BLM to assess environmental impacts of proposed actions, including changes to soils and erosion potential. Vegetation removal clearly triggers the need for impact analysis and mitigation planning.
- FLPMA's multiple-use and landscape health mandates (43 U.S.C. § 1732) require BLM to manage lands in ways that protect resource values - including soil stability and resilience in arid lands.
- State and local erosion control codes underscore that ground cover and topsoil loss must be minimized, and disturbed areas promptly stabilized - analogous guidance exists even for grading in urban areas due to blowing dust concerns.

We recommend the following for the Draft EA:

- 1. Analyze immediate and long-term impacts of vegetation removal across the campground footprint, specifically addressing increased wind erosion, sand mobilization, dust emissions, and potential blow-out formation.**
- 2. Model or reference empirical data—such as sand flux multipliers post-removal—to quantify likely erosion increases and areas of risk.**
- 3. Include mitigation measures, for example:**
 - **Retaining native ground cover where possible,**
 - **Prompt revegetation using native, erosion-resistant species,**
 - **Using windbreaks or temporary mulching to reduce sand transport during the establishment period.**

Without such analysis and mitigation planning, the campground development risks creating persistent landscape degradation, extending beyond the built footprint, in direct conflict with NEPA, FLPMA, and responsible land stewardship.

EDUCATION

BLM should analyze the educational resources utilized to inform the public about camping recreation at the BLFC area. Evaluate resources that are underutilized, 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 camping recreation at the BLFC area 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 BLFC area and surrounding HMFG TMA should be included in the Draft EA, including data and sources on route usage such as counters installed on trails.

TRANSPARENCY AND EASE OF SUBMITTING COMMENTS BY PUBLIC

Many of our members and supporters have expressed considerable frustration and difficulties using the ePlanning website to submit comments. Both the BLM and UPLA have been emphasizing the importance of more substantive comments, but the Participate Now link makes it much more difficult. The E Planning Scoping Comment website does not function properly, issues include:

- 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
- Only allowing 15 days for public comments is far too short to communicate the scope of the project, and encourage members to comment. This can be confirmed by the fact that on the last day of the comment period, only 36 submissions have been received as shown in the screenshot below. With very low participation by the public in Scoping, we fear that the EA will also be limited in its scope.



BLM National NEPA Register

Participate Now

The following participation periods are open for submitting feedback on the listed document(s) and/or map(s). Submissions can be received until 11:59 p.m., Mountain Time on the listed end date.

Participate	Document/Map...	Type	Period	Status	Submission Count
Participate Now	Beas Lewis Flat Campg...	Document	07/30/2025 - 08/14/2025	Open	36

*Note: A status of "Closed" identifies a Participation Period as closed with public input still allowed.

We believe you should add an email option for comment submission in addition to submission via the online NEPA Register, then reopen and relaunch Scoping comments for the normal 30 day comment period.

ADDITIONAL SCOPING RECOMMENDATIONS

In keeping with the BLM’s legal and procedural obligation to designate and retain all existing dispersed camping in the HMFG TMA, we recommend that the following items be included in the Draft EA for new camping developments and recreation infrastructure that are proposed for construction through the BLFC project.

Data Analysis

Given the known fact that BLFC area is a high value, popular area within the HMFG TMA for free, dispersed camping, it is pertinent that the BLM conduct a comprehensive study to fully examine traffic and camping data for all sites that are identified as proposed locations for improved campgrounds. These studies should be done initially and after each phase is completed. Lessons about sites that were not being used should be gleaned by doing an analysis. Each camper in a developed site should be inventoried with their type of rigs, number of people. Especially during the first phase, every camper should be surveyed to find out what they like and don’t like. These should be done before final planning and construction begins on the next phase. The volume of campers who recreate in the BLFC area is already very high, and it is logical to anticipate that current numbers will continue to rise in alignment with the growing popularity of outdoor recreation that has trended consistently upward over the last decade. It is equally logical to anticipate that new campgrounds will attract more recreators to the BLFC. With increased traffic, the BLM will need to do something to accommodate a larger volume of recreators to



prevent the proliferation of new user-created dispersed campsites and roadside car camping, especially on busy weekends.

While we support the construction of the proposed developed campgrounds to accommodate increased traffic, we urge that the stages only proceed after monitoring ensures that the stages achieve the desired outcome. Careful evaluation should be done to ensure that restroom construction is adequate to support the additional campsites and enhancement of day use areas. Close attention should be paid if developed camping is not full and users are camping in outlying areas. Contacts should be made with those people to survey why they did not use the Developed Campground. Specific objectives should be established for performance at each phase, and monitoring results before design is set for the next phase.

The EA should include traffic and dispersed camping studies for an extended period of time to verify the average and maximum visitor levels at different times of the year.

The campground design should accommodate a wide diversity of campsites to accommodate camping vehicles and tow rigs, including 40', 60' and 80' sites. An analysis should be based on studies of what rigs visitors are likely to bring to the new developed campground.

Economic Analysis

We support a decision to build new campsites and facilities in the BLFC area in addition to designating and retaining all existing dispersed camping. New developed campsites may draw some users away from existing dispersed camping, and thus spread out user concentration, thereby decreasing potential for resource damage from user density. However, we cannot support the concept of new developed sites if they are all planned as fee-based. The availability of fee-only camping has previously been demonstrated as a direct cause of displacement for many campers; this is particularly true of the common user demographics in the HMFG TMA. Fee-only camping will force most users away from camping at the BLFC, but it won't likely deter them from not camping at all. Rather, fee-only camping will cause many users to disperse to other nearby areas within the HMFG TMA. It is already difficult for locals from the Wayne County region, as well as visitors from other areas, to find dispersed camping. Forcing user groups to camp solely within fee-based developed campsites will cause unnecessary hardship and further condense users in a smaller areas with increased traffic. In the long run, this will perpetuate and exacerbate the current status of high usage rates for existing campsites in this area.



We recommend that the BLM plan out the entire existing area of dispersed campsites, have all dispersed campsites designated, and conduct NEPA as necessary to formally designate all existing dispersed campsites.

The EA should review other BLM areas where dispersed, free camping was replaced with fee based developed camping. Factors that should be determined would include whether the public accepted the fee based campgrounds or sought other areas where they could continue to camp for free. Analysis on various fee levels should also be included with results on occupancy at other sites. The proposed fees should be in the EA.

SUMMARY OF RECOMMENDATIONS TO ENSURE A PROCEDURALLY AND LEGALLY COMPLIANT DRAFT EA

To avoid arbitrary, capricious, and unintended consequences from implementation of a procedurally or legally uncompliant BLFC plan, UPLA recommends that the Draft and Final EA incorporate the following:

1. 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 to an adequate volume of both developed and dispersed camping.
2. None of the alternatives presented in the Draft EA include closure or restricted access to existing dispersed camping in the HMFG TMA; preserve all existing dispersed camping.
3. Include a true Recreation alternative among the range of alternatives.
4. Provide tables and maps to demonstrate explicitly the volume and location of existing developed and dispersed camping that is accessible via motorized and mechanized means across the HMFG, SRS, and SRD TMAs. The tables and maps should also include the acreage of land that is designated as Lands with Wilderness Characteristics (LWC), Wilderness Study Areas (WSA), and Areas of Critical Environmental Concern (ACEC).
5. Explicitly demonstrate project conformance with the January 15, 2025 HMFG Travel Management Plan (TMP). The campground's access roads, designated camping boundaries, and supporting infrastructure must not result in the closure, reclassification, or functional impairment of motorized routes identified as open in the TMP.
6. The proposed campground be paired with Dingell Act-aligned public access enhancements elsewhere in the HMFG TMA.
7. Align the BLFC Plan with the Dingell Act by:
 - Retaining and formally designating existing dispersed campsites
 - Adding developed campgrounds to expand options, not replace traditional access



- Providing infrastructure (e.g., toilets, signage, hardened surfaces) to support both forms of recreation
 - Conducting NEPA review if closures are proposed, with full public comment and alternatives analysis
8. Designate existing dispersed camping zones within the HMFG area through formal, binding designation (as “dispersed camping areas” within the TMP or RMP), so that they remain available in perpetuity, consistent with FLPMA.
 9. Acknowledge in the project record that campground demand stems from recent OHV closures in HMFG and adjacent TMAs, to ensure transparency and avoid creating a cyclical justification for further development in lieu of access preservation.
 10. Comply with all relevant statutory and regulatory frameworks, including:
 - FLPMA, mandating multiple-use recreation and protection of outdoor access.
 - 43 C.F.R. § 8342.1, requiring thoughtful designations rather than defaulting to closures.
 - Utah state policy (through PLPCO), which actively opposes excessive closures that diminish access and local economic benefits.
 11. Provide Leave-No-Trace education, respecting traditions of self-reliance and stewardship.
 12. Deploy ongoing monitoring using visitor counts and site condition surveys to adaptively manage density and impacts.
 13. Demonstrate that resource damage or public health issues are present at existing dispersed campsites as part of the draft EA documentation to provide evidence of the claims advanced in Scoping documents, given that the proposed action would result in restricted access or complete closure of existing high-value dispersed camping areas.
 14. 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 existing dispersed camping, proposed developed campsites, and proposed new or improved recreation infrastructure, must be clearly articulated in EA 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 both inside and outside of the HMFG TMA and the BLFC area, must be included.
 15. Reports from Fish and Wildlife on resource impacts, and any other agency report used in making recommendations in relationship to Endangered or Threatened ESA species should be included in the Draft EA.
 16. If any previous action has been taken to mitigate impacts of human uses on ESA species habitat and ability to thrive within the BLFC project, 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 BLFC project, an explanation should be provided as to why. If mitigations have been attempted on public or private lands outside of the BLFC project this should also be noted with the same details as aforementioned.

17. Include a comprehensive analysis of economic impacts for the HMFG TMA in order to demonstrate how the proposed actions will affect the local and regional economy.
18. Comply with the EXPLORE Act's mandates: preserve current access, integrate GIS-compliant mapping, and ensure no loss of recreational opportunities.
19. Remove the proposed Designated Camping Area from the BLFC plan entirely.
20. Analyze how OHV and dispersed camping access would be affected by concentrating users at the developed campground - including impacts on traffic flow, user conflicts, and access to adjoining lands.
21. Consider reasonable alternatives, such as:
 - Locating the campground in a less disruptive site with lower OHV traffic volumes;
 - Spreading campsite locations more evenly rather than centralizing them;
 - Enhancing dispersed camping access in nearby areas to offset potential access constraints.
22. Assess mitigation measures - such as designated OHV circulation patterns, expanded staging areas, or directional signage - to prevent campground-driven congestion from undermining broader access.
23. Analyze immediate and long-term impacts of vegetation removal across the campground footprint, specifically addressing increased wind erosion, sand mobilization, dust emissions, and potential blow-out formation.
24. Model or reference empirical data of the impacts of vegetation removal to quantify likely erosion increases and areas of risk.
25. Include mitigation measures to address the impacts of vegetation removal.
26. Analyze the educational resources utilized to inform the public about camping recreation at the BLFC area. Evaluate resources that are underutilized, and how BLM will address improving that public education.
27. Include current applicable Resource Management Guides in the EPlanning website data. Where camping recreation at the BLFC area 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 BLFC area and surrounding HMFG TMA should be included in the Draft EA, including data and sources on route usage such as counters installed on trails.



28. Add an email option for comment submission in addition to submission via the online NEPA Register, then reopen and relaunch Scoping comments for the normal 30 day comment period.
29. Include traffic and dispersed camping studies for an extended period of time to verify the average and maximum visitor levels at different times of the year.
30. The campground design should accommodate a wide diversity of campsites to accommodate camping vehicles and tow rigs, including 40', 60' and 80' sites. An analysis should be based on studies of what rigs visitors are likely to bring to the new developed campground, with all data from such studies included in the Draft EA.
31. Plan out the entire existing area of dispersed campsites, have all dispersed campsites designated, and conduct NEPA as necessary to formally designate all existing dispersed campsites.
32. The EA should review other BLM areas where dispersed, free camping was replaced with fee based developed camping. Factors that should be determined would include whether the public accepted the fee based campgrounds or sought other areas where they could continue to camp for free. Analysis on various fee levels should also be included with results on occupancy at other sites. The proposed fees should be in the EA.

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 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 HMFG 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 BLFC project that would diminish or eliminate public access to the HMFG 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 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 BLFC project. Information can be sent to the following address and email address:

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Utah Public Lands Alliance
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Sincerely,

Rose Winn
Natural Resources Consultant
Utah Public Lands Alliance
559.862.6382

Loren Campbell
President
Utah Public Lands Association
909.499.3295

cc: Senator Mike Lee, Senator John Curtis, Congresswoman Celeste Malloy, Congressman Blake Moore, Congressman Burgess Owens, Congressman Mike Kennedy, Governor Spencer Cox, PLPCO Executive Director Redge Johnson, UPLA Trustees and Members

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4. US Department of the Interior. Bureau of Land Management. How We Manage. December 2023. <https://www.blm.gov/about/how-we-manage>
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