



Date: September 17, 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, Draft EA (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](#), Draft Environmental Assessment (EA), 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 BLFC project site 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.



## TABLE OF CONTENTS

<b>Topic</b>	<b>Page</b>
General comments	4
Draft Environmental Assessment (EA) Analysis	7
Short List of Concrete Text Edits to the Draft EA	13
Why These Changes Matter	14
Final Recommendations (Prioritized)	15



## 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](#), 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.

We expressed the concern in Scoping comments, and reiterate now in our Draft EA comments, that the Draft EA, that the BLFC plan as written places recreational values in an unreasonably and unjustifiably 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 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.

Within the Draft 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

We addressed each of the items noted above in detail within our Scoping comment letter. Rather than repeat the contents of that letter that were not sufficiently addressed and incorporated into the Draft EA, we cite reference to our Scoping comment as both background and supplemental content to our Draft EA comment.

We are disappointed that the BLM did not meaningfully incorporate public feedback from the Scoping period into the Draft EA for the BLFC. Despite substantial input from UPLA and other local stakeholders of the Richfield Field Office, the Draft EA reflects an approach that disregards those concerns and fails to align with Congress's directive for multiple-use management of BLM-managed public lands.

The Draft EA also demonstrates a troubling misalignment with the requirements of the National Environmental Policy Act (NEPA) and the Federal Land Policy and Management Act (FLPMA). Proceeding under this framework sets the BLM on a path toward implementing a plan that is legally and procedurally flawed, arbitrary, and capricious. Worse, it positions the agency in direct opposition to the human, economic, social, and natural resource needs of the region.

UPLA strongly urges the BLM to revise the Draft EA to meaningfully respond to public input, including UPLA's recommendations, and to adjust the project scope and policy framework so that the final decision is fully consistent with NEPA and FLPMA. Only by doing so can the agency fulfill its statutory obligations and meet the multiple-use mandate that ensures public lands continue to serve diverse stakeholders and sustain the communities that depend on them.

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.



## DRAFT EA ANALYSIS

After reviewing the Draft EA, we noted that the majority of our feedback from the Scoping period is not reflected in the Environmental Assessment. While a limited number of concerns that we raised were addressed in part, they were not resolved sufficiently to bring the BFLC project into alignment with legal and procedural requirements.

- **Partially adopted:** BLM reduced the originally proposed “limited to designated camping” boundary in response to scoping comments. (Draft EA: response to scoping, Sec. 1.6; map/description Sec. 2.2.3). However dispersed camping remains severely compromised through elimination of vast acreage from accessibility to dispersed camping.
- **Not adopted / not included:** BLM did not include a separate “Recreation alternative” that preserves dispersed camping (UPLA’s requested “true Recreation alternative”) — the EA analyzes two alternatives only (No Action and Proposed Action). (Chapter 2).
- **Not adopted / eliminated:** BLM considered but eliminated a “Designated Dispersed Campsites” alternative (saying it could be done later). (Sec. 2.3.2). This directly conflicts with UPLA’s request to *formally designate* dispersed sites within this action in order to maintain alignment with the multiple-use mandate for BLM public land management.
- **Partial / superficial treatment:** Vegetation/soils/erosion and species issues are treated in brief and by POs (project design features) rather than the comprehensive analyses UPLA requested (no erosion modeling shown; soil crusts are noted but not quantitatively modeled). (Sections 2.2.4.2; 3.3 & 3.4).
- **Absent or insufficient:** EA lacks an explicit Dingell Act or EXPLORE Act legal discussion, and it does not provide an economic impact analysis of the scale that is legally and procedurally required for an EA. The EA references FLPMA and the RMP but does not document conformance with the HMFG Travel Management Plan (TMP).

Below, we provide a review of our Scoping recommendations to content within the Draft EA, with citations and suggested revisions.

- 1) **“Do not include closure or restricted access to existing dispersed camping; preserve existing dispersed camping”**
  - a. **Scoping comment (summary):** Retain and formally designate existing dispersed sites; avoid closures.
  - b. **What the Draft EA does:** Proposes a “limited to designated camping” area (approx. 1,524 acres) that would restrict camping outside designated areas within



that boundary (Section 2.2.3, pp. 9–10). The EA notes the “limited to designated camping” area was reduced in response to scoping comments (Section 1.6, p. 6).

- i. EA language: “To support resource protection and visitor management, the BLM would limit dispersed camping on the BLM-managed lands identified in Appendix A; Map 3... Camping outside of designated areas within the ‘limited to designated camping’ area ... would not be allowed.” (Sec. 2.2.3, p. 9–10).

It is essential for the BLM to *preserve* and *formally designate* dispersed sites. The EA instead proposes a restriction (limited area) and a developed campground that would displace dispersed camping inside that boundary. The EA *did* reduce the boundary in response to public comment (so there was partial responsiveness), but the fundamental approach remains to limit dispersed camping in the footprint.

**Suggested revision:**

- Replace the “limited to designated camping” blanket restriction with an alternative that *formally designates existing dispersed campsites* and adds minimal signage/parking to protect those sites — i.e., make designated dispersed campsites a full alternative in Chapter 2 (see suggested text below). (Add to Chapter 2, Sec. 2.2 and analyze in Ch. 3.)
  - Where the EA discusses displacement of unmanaged camping (Sec. 3.4.1.4), add quantitative maps/tables listing existing dispersed campsites and their **coordinates**, and state those would be retained and managed (not closed). (Appendix A + a table in Ch. 3).
- 2) **“Include a true Recreation alternative (to maximize multiple-use/recreation)”**
- a. **Scoping comment:** Add a Recreation alternative that preserves dispersed camping and optimizes recreation access.
  - b. **What the Draft EA does:** The EA analyzes Alternative A – No Action and Alternative B – Proposed Action only (Chapter 2, p. 8). There is no separate Recreation alternative that preserves dispersed camping while providing facilities.

The EA did not include the Recreation alternative as required by NEPA.

**Suggested revision:**

- Add **Alternative C – Recreation Emphasis** (Chapter 2). Describe it as: *retain all current dispersed camping, formally designate (and sign) hardened dispersed sites, add a modest number of developed sites (free +*



*fee mix), and pair with outreach/monitoring rather than creating a “limited to designated camping” closure area.*

- Analyze that alternative in Chapter 3 for recreation, soils, vegetation, visual, and socioeconomics (see #5 below). Provide measurable performance criteria (e.g., target campground occupancy, visitor redistribution metrics) and monitoring triggers.

**3) “Formally designate existing dispersed campsites (not eliminate them); use NEPA to do that if necessary”**

- a. Scoping comment:** Designate dispersed camping areas (preferably via this NEPA action or by a concurrent action), not just leave as informal uses.
- b. What the Draft EA does:** BLM considered a “Designated Dispersed Campsites” option but eliminated it from detailed analysis (Sec. 2.3.2, p. 11). The EA says such designation could be done in a separate future action.

Within this EA, BLM explicitly deferred designation of dispersed campsites.

**Suggested revision:**

- Either include the designated dispersed sites as an analyzed alternative now, or (at minimum) commit to a concurrent NEPA action with schedule and scope in the EA (Sec. 2.3.2), and add an explicit commitment to no closures until that process is complete.
- Add a table and map of candidate dispersed sites (Appendix A + Ch. 3) and describe selection criteria (access, hardened surface, sanitation, proximity).

**4) “Demonstrate conformance with the HMFG Travel Management Plan (TMP) and preserve TMP routes”**

- a. Scoping comment:** Explicitly demonstrate conformance with the January 15, 2025 HMFG TMP and ensure campground actions do not impair routes.
- b. What the Draft EA does:** EA declares conformance with the Richfield RMP (Sec. 1.5, p. 5–6) but does not reference or analyze conformance with the HMFG Travel Management Plan (no explicit TMP discussion found). (I searched the EA for “Travel Management Plan”, “TMP”, and similar — none are present.)

RMP conformance is stated, but TMP conformance and explicit route-level impacts are not documented.



**Suggested revision:**

- Add a new subsection in Section 1.4 / 1.5 titled “Conformance with HMFG Travel Management Plan (TMP)” that: (a) cites the Jan 15, 2025 TMP, (b) overlays the project maps with the TMP route designations (Appendix A, Map X), and (c) documents that no open TMP routes will be closed or impaired (or, if reroutes are proposed, explain why and how TMP will be updated).
- If any temporary closures or reroutes are needed during construction, include exact coordinates, duration, and mitigation measures.

**5) “Provide a comprehensive economic impact analysis (local/regional) and analyze fee impacts”**

- a. Scoping comment:** Quantitative economic analysis (visitor spending, jobs, tax revenue) and discussion of fees and their effects.
- b. What the Draft EA does:** EA references FLREA/fees in Table 1-1 (Sec. 1.4, p. 5) and states fees will be used for maintenance, but there is no standalone economic impact section or quantitative local economic analysis in the EA. (Chapters and topics analyzed are vegetation, soils, migratory birds, visual resources; recreation is analyzed in terms of visitor experience and sanitation but not in economic terms).

EA lacks the economic analysis UPLA requested.

**Suggested revision:**

- Add a “Socioeconomics / Economics” subsection within Chapter 3 (or as a new standalone section) with: baseline tourism/economic data (visitor counts, estimated spending per visitor), projected changes under each alternative (No Action, Proposed Action, Recreation Alt), and fee scenarios (including occupancy sensitivity to fee levels). Use accepted methods (IO multipliers or published local spending estimates).
- Provide a fee schedule for camping. Without a specific fee schedule, it is impossible for substantive comments to be submitted by the public regarding their impact
- Include a table estimating local revenue impacts (seasonal and annual) for each alternative and a short mitigation plan if negative economic impacts are anticipated.



6) “Analyze species/ESA concerns in detail; include wildlife agency reports and mitigation history”

- a. **Scoping comment:** Where ESA or species of concern exist, document proximity of habitat, include agency reports (FWS), and disclose prior mitigation attempts.
- b. **What the Draft EA does:** The EA includes Migratory Birds (Sec. 3.3.4, p. 14) and notes seasonal avoidance and buffers (Sec. 2.2.4.1). However, I found no discussion of ESA-listed species or explicit Fish & Wildlife (FWS) consultation results in the body text. The IDT checklist is referenced (Appendix B), but the main text does not provide a comprehensive ESA species treatment or FWS reports.

Migratory birds are considered, but insufficient relative to the need for full ESA species review and agency reports.

**Suggested revision:**

- Add a subsection 3.x — Threatened & Endangered Species with explicit species lists (from FWS/IPaC), maps of habitat overlap, and summary of formal or informal consultation status.
- Attach any FWS correspondence or surveys as an appendix and describe prior mitigation attempts and monitoring results (or commit to doing surveys/Section 7 consultation prior to ground-disturbing work).

7) “Analyze vegetation removal effects on wind erosion and sand transport (quantitative modeling) and include mitigation”

- a. **Scoping comment:** Model wind erosion/sand transport effects from vegetation removal, quantify risk, and include mitigation measures (e.g., revegetation timelines, windbreaks, mulching).
- b. **What the Draft EA does:** Soils/vegetation are analyzed in brief (Sections 3.3.1 and 3.3.3; and project design features 2.2.4.2 include erosion control, reseeding, and minimize disturbance). The EA states some measures (maximize use of previously disturbed land; erosion control culverts; reseeding) and claims the project is expected to improve soil stability. But the EA does not present quantitative erosion modeling or sand transport flux estimates UPLA requested. (See pp. 13–15).

Design features are listed, but not adopted per the need for quantitative analysis and modeling.



**Suggested revision:**

- Add a quantitative erosion analysis (use published sand flux multipliers or a simple wind erosion model) in Section 3.3 (Soils) that compares pre- and post-disturbance scenarios and identifies high-risk zones.
- Specify measurable mitigation (seed mixes, mulching rates, temporary wind fences, revegetation schedule with success criteria, and contingency if revegetation < X% after Y years). Put detailed stabilization prescriptions into Project Design Features (2.2.4.2).

**8) “Provide maps and tables showing volume and location of existing developed and dispersed camping across HMFG, SRS, and SRD TMAs, and acreage of LWC/WSA/ACEC”**

- a. Scoping comment:** Provide comprehensive maps/tables as baseline data to evaluate impacts.
- b. What the Draft EA does:** EA includes Appendix A: Maps, but the EA’s text only references maps for the project area and the limited area (see Sec. 2.2.3 and Sec. 1.6). The EA does not present a regional table or map inventory of **all** existing developed and dispersed campsites across the HMFG, SRS, and SRD TMAs nor a table of acreage for LWC/WSA/ACEC across those TMAs.

The EA has project maps but lacks the broader TMA-level inventory UPLA requested.

**Suggested revision:**

- Add a new Appendix or expanded Appendix A with: (a) Map layer showing all developed campgrounds + dispersed campsite clusters across HMFG, SRS, SRD TMAs; (b) Table with counts and coordinates; (c) acreage table for LWC/WSA/ACEC overlapping those TMAs.
- Use those baselines to analyze cumulative impacts and to show how the Proposed Action affects regional opportunity.

**9) “Comply with EXPLORE Act obligations (GIS-compliant maps, preserve access)”**

- a. Scoping comment:** EA should specifically reference EXPLORE Act obligations and incorporate GIS mapping and access commitments.
- b. What the Draft EA does:** EA references statutory authorities (Table 1-1 includes FLPMA, NEPA, FLREA, NHPA) but I could not find any explicit mention of the EXPLORE Act or GIS-mapping commitments required by that Act.



No explicit EXPLORE Act discussion or GIS commitments were found.

**Suggested revision:**

- Add a short legal/policy subsection listing relevant recreation statutes including the EXPLORE Act and describe how the project will maintain GIS-compliant route/camp maps and not reduce access inconsistent with the Act.
- Add the GIS layers used (or commit to publishing them) as an appendix or web deliverable.

**10) “Provide robust public involvement (extend comment period, provide email option)”**

- a. **UPLA ask:** Extend scoping / EA comment period to 30 days and add email option for comments.
- b. **What the Draft EA does:** EA documents the scoping period (July 30 – Aug 14, 2025) (15 days) and states 44 submissions during scoping (Sec. 1.6 & Ch. 4). For the EA public comment period it states the public comment was opened Sept 2– Sept 17, 2025 (15 days). The EA does not say the BLM added an email submission option or extended the comment period. It does say BLM reduced the limited area in response to comments (Sec. 1.6).

BLM responded to scoping by reducing boundary, but did not provide an extended comment period or email option.

**Suggested revision:**

- BLM should explicitly reopen a 30-day public comment period for the Draft EA (or commit to it), and provide an email address in addition to ePlanning for comment submission. Add the commitment text to Section 4.1 (Public Involvement) and include instructions and dates.

**SHORT LIST OF CONCRETE TEXT EDITS TO THE DRAFT EA**

Below are *specific* text insertions / section additions to bring the EA into alignment with legal and procedural requirements:



## Chapter 2 — New Alternative C (Recreation Emphasis) (immediately after 2.2):

- **2.4 Alternative C — Recreation Emphasis:** *Describe alternative that (1) retains and formally designates existing dispersed campsites (list/map in Appendix A), (2) constructs a smaller number of developed sites (mix of free and fee) to supplement rather than replace dispersed campsites, (3) eliminates any “limited to designated camping” closures, instead using signage, sanitation facilities, and monitoring, and (4) implements an adaptive monitoring program with performance triggers to adjust management. Analyze this alternative in Chapter 3.*

## Chapter 3 — New subsection: Socioeconomics / Economic Impact (add after Recreation):

- Baseline visitor spending (use CARE visitation & observed vehicle counts), estimate direct visitor spending per day, estimate employment/tax impacts, model fee-sensitivity (occupancy vs fee), and present results by alternative.
- **Section 1.4 / 1.5 — Add CONFORMANCE WITH HMFG TMP:**
  - *Insert a paragraph citing the Jan 15, 2025 HMFG Travel Management Plan and add a table/map showing project overlays with TMP routes. State explicitly whether any TMP-designated routes will be reclassified or functionally impaired; if any changes are proposed, list them and rationale.*
- **Section 3.3 (Soils & Vegetation) — Add quantitative erosion analysis:**
  - *Insert modeled estimates (or a literature-based multiplier) showing expected sand flux increase from vegetation removal, identify high-risk cells, and attach mitigation prescriptions (seed mix, revegetation schedule, contingency triggers).*
- **Section 3.x — Threatened & Endangered Species:**
  - *Add species list from FWS/IPaC, maps of habitat overlap, FWS correspondence, and a description of Section 7 or informal consultation status.*

**Chapter 4 — Public Involvement:** Add commitment to reopen a **30-day** comment period for the Draft EA and provide an email address for comments (and ensure the EA is updated on ePlanning).

**Appendix A:** Expand maps to include **regional inventory** of dispersed camp clusters (HMFG, SRS, SRD) and acreage table for LWC/WSA/ACEC.

### **WHY THESE CHANGES MATTER**

UPLA’s recommendations center on preserving dispersed camping and ensuring NEPA alternatives reflect travel-management, legal obligations (Dingell, EXPLORE Act, FLPMA), and



economic impacts. The current Draft EA focuses on consolidating use into a developed campground and limited area, with only brief analyses of soils/vegetation and no economic analysis, no TMP conformance discussion, and an explicit decision to defer designation of dispersed campsites to a later action. That structure does not fulfill the legal and procedural requirement for a recreation-preserving alternative or the analytic depth that is necessary for the scope of this project. The edits above restore balance — they provide the legally required alternatives analysis and the data needed for reasoned choice.

### **FINAL RECOMMENDATIONS (PRIORITIZED)**

1. **Add Alternative C (Recreation Emphasis)** now (Chapter 2) and analyze it fully in Chapter 3. (Highest priority)
2. **Reinsert “Designated Dispersed Campsites”** as an analyzed alternative or commit to an immediate, concurrent NEPA action to designate dispersed sites (Sec. 2.3.2 currently defers this).
3. **Add a socioeconomics / economic impact section** with fee-sensitivity analysis.
4. **Add TMP conformance subsection** and overlay maps (Appendix A).
5. **Add quantitative erosion/sand transport analysis** and stronger, measurable revegetation/stabilization mitigation in Project Design Features.
6. **Add ESA species section and FWS consultations** (or commit to Section 7 prior to ground disturbance).
7. **Reopen a 30-day Draft EA comment period** and include an email submission option (update Ch. 4).

### **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:

Rose Winn  
Utah Public Lands Alliance  
PO Box 833, St. George, UT 84771  
[rose@utahpla.com](mailto:rose@utahpla.com)

Sincerely,

Rose Winn  
Natural Resources Consultant  
Utah Public Lands Alliance

Loren Campbell  
President  
Utah Public Lands Association

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