



Date: December 23, 2025

Bureau of Land Management – St. George Field Office  
Attn: SR9 Campground Management Project Team  
345 E. Riverside Drive  
St. George, UT 84790

Via Submission on ePlanning: <https://eplanning.blm.gov/eplanning-ui/project/2037941/510>

RE: SR9 Campground Management Preliminary Draft Environmental Assessment (DOI-BLM-UT-C030-2025-0019-EA)

Dear BLM Planning Team,

Utah Public Lands Alliance (UPLA) is writing to provide public comment on the SR9 Campground Management Draft Environmental Assessment (EA), hereto forward referred to with the acronym SR9CM. Many of our members and supporters live near and/or recreate throughout the public land that is managed by the Bureau of Land Management (BLM) St. George Field Office in Utah. BLM-managed public lands throughout the jurisdiction of the St. George Field Office, including the area of dispersed camping throughout the SR9CM project 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 SR9CM project. Thus, our members are among the millions of people who will be impacted by the outcome of this 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 SR9CM 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 that lives in Virgin, Utah where the project is located. 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.

### **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 St. George 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. 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 express concern that the Draft EA as currently 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. SR9CM 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 SR9CM 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 SR9CM 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.

UPLA supports adding well-designed, sustainably sited developed campgrounds and associated sanitation/safety infrastructure in the SR9 corridor - especially where the Draft EA smartly proposes concentrating development in already-disturbed areas, such as the existing community sandstone quarry footprint for the Flagstone Quarry Campground (BLM, 2025a, pp. 9–10; Appendix A, Map A-2). At the same time, UPLA strongly opposes the Draft EA’s broad approach to eliminating dispersed camping across large landscapes through the proposed “limited to designated camping areas” designation on approximately 13,943 acres (BLM, 2025a, pp. 11, 25–26; Appendix A, Map A-5).

In short: we **support adding camping capacity and improving management - but not by wiping out the dispersed camping opportunity that is central to public-land access, affordability, and the region’s recreation economy.** The Draft EA repeatedly frames dispersed camping growth and resource impacts as a core problem (BLM, 2025a, pp. 21–23), yet the document also acknowledges that dispersed camping - when actively managed as “designated dispersed camping” - is a tool the BLM already uses (BLM, 2025a, pp. 21–22). That distinction matters. The Draft EA presents a false choice between “unmanaged dispersed camping” and “closure,” when the agency has a third option that is both practical and proven: **retain dispersed camping, manage it, and use a modern, user-friendly reservation/permit system to produce the data and compliance the Draft EA currently lacks.**

### **Visitation has increased - but the Draft EA does not document camping use, occupancy, or capacity triggers**

The Draft EA relies heavily on regional visitation proxies, particularly Zion National Park visitation trends, to justify the need for major camping management changes on adjacent BLM lands (BLM, 2025a, p. 22). The Draft EA states that Zion visitation increased 55% from 2014 to 2024 (3.19 million to 4.95 million) and assumes a corresponding increase in recreation demand and camping demand throughout the Analysis Area (BLM, 2025a, p. 22). UPLA does not dispute increased visitation pressure in the broader Zion region. However, the Draft EA does not provide baseline data for the specific decision it proposes: restricting camping to designated areas over 13,943 acres and restoring/closing dispersed impacts across dozens of acres (BLM, 2025a, pp. 3, 11, 25–26).



This is not a minor technicality. The Draft EA’s own issue statements emphasize user conflict, visitor experience, and resource degradation from camping expansion (BLM, 2025a, pp. 21–26). Yet the EA does not quantify:

- **Camping nights** in the Project Area or sub-areas (Hurricane Cliffs vs. Gooseberry vs. Smithsonian Butte/North Creek/Mosquito Cover closures).
- **Occupancy rates** at existing designated dispersed sites.
- **Frequency of “full capacity” conditions** at key nodes (e.g., Sheep Bridge corridor), including weekend/holiday peaks.
- **Displacement patterns** (where campers go when sites are occupied or restricted).

The Draft EA acknowledges uncertainty and phased implementation driven by future funding and unknown numbers of phases (BLM, 2025a, p. 11). UPLA agrees that adaptive phasing is sensible - but adaptive management must be anchored to measurable triggers, not assumptions, nor based solely on funding availability. Without occupancy and camping-night data, the Draft EA cannot credibly support a landscape-scale restriction that effectively eliminates dispersed camping opportunities for large portions of the corridor.

UPLA also notes the Draft EA’s internal tension: it says the BLM currently manages 56 designated dispersed campsites in the Hurricane Cliffs Recreation Area, while “remaining demand” translates to unmanaged dispersed camping (BLM, 2025a, p. 22). If that is true, then the obvious management response is not to remove dispersed camping across huge acreages; it is to (1) expand the designated dispersed model where appropriate, (2) implement a permit/reservation framework to control use and generate reliable data, and (3) add developed campgrounds to absorb demand and improve sanitation - as a complement, not a replacement (BLM, 2025a, pp. 9–12, 21–26).

**Closing “limited to designated camping areas” across 13,943 acres is excessive and unnecessary - use managed access instead**

The Draft EA’s decision space includes establishing “limited to designated camping areas” on approximately 13,943 acres (BLM, 2025a, pp. 3, 11). In practice, this is the single most consequential action in the EA: it transforms large areas that currently support dispersed camping into areas where camping becomes illegal unless occurring in a campground or BLM-designated dispersed site (BLM, 2025a, p. 11; Appendix A, Map A-5).

The Draft EA states this restriction is intended to reduce degradation, improve sanitation, enhance safety, and promote long-term sustainability (BLM, 2025a, p. 11). UPLA supports these



objectives, but our field visits to the dispersed camping along SR9 does not confirm the resource impacts cited in the EA. The soil is compacted where the existing campsites are located and vegetation has been removed from the campsites, but this is no different than the expanded developed sites in the EA. Further, I drive past this location at least twice a day all year long, and I have never seen anything close to full occupancy. A few of the designated sites are missing their signs and fire rings, but otherwise the sites are ideal for many campers, allowing separation from others and plenty of space. I saw no issue with trash or sanitation issues. Photos I took of the site can be seen on our public drive that are evidence of these statements can be found here <https://drive.google.com/drive/folders/1Wg74GMMgfzxhvkCQYBs46MoLPk46zAn1?usp=sharing>

The Draft EA does not show why this broad restriction is the least restrictive effective tool, particularly given the BLM’s demonstrated ability to actively manage dispersed camping through designation, site hardening, toilet/trash placement, signage, route control, and compliance mechanisms (BLM, 2025a, p. 22).

A legally and procedurally compliant alternative that is consistent with the Draft EA’s purpose and need is available. We urge the BLM to analyze (and ultimately select) an alternative that:

1. **Retains dispersed camping throughout the Project Area** except for truly resource-sensitive or safety-critical zones where closures are narrowly tailored and clearly justified with site-specific evidence;
2. **Transitions dispersed camping to a “managed dispersed camping” program** using a reservation/permit system (described in Section 6 below); and
3. **Uses phased designation and restoration** based on measurable triggers - occupancy, resource indicators (trash volumes, human waste incidents, off-route proliferation), and compliance metrics—rather than a blanket acreage-based restriction.

The Draft EA already acknowledges that implementation would be phased and dependent on future funding and resources (BLM, 2025a, p. 11). UPLA’s approach fits that same reality, but it avoids turning the phasing period into a multi-year de facto closure regime without adequate baseline data.

Our on-the-ground observation align with the EA’s data gap - frequent travel on Sheep Bridge with designated sites not appearing full – this may not be universally true across the corridor, but it highlights the core problem: the EA does not provide the occupancy evidence needed to rebut that lived experience. A permit/reservation system would solve this immediately by producing objective, time-stamped use data while also funding light-touch management.



## **The socioeconomics analysis is incomplete because it does not quantify campers, camping nights, or who will be priced out**

The Draft EA includes a socioeconomics discussion and references an Appendix D Socioeconomics Baseline Report (BLM, 2025a, p. 41). The EA notes cost-of-living concerns in Washington County, including housing-cost burden and lower median income than statewide averages (BLM, 2025a, p. 41). It also notes local employment concentrations in seasonal and lower-wage industries and explicitly links those conditions to increased use of campgrounds and dispersed camping (BLM, 2025a, p. 41).

UPLA appreciates that the Draft EA recognizes affordability pressures and the role of camping as a budget accommodation strategy. However, the Draft EA still does not quantify the most critical socioeconomic variables for this decision:

- **Number of campers** using dispersed sites vs. other lodging, and **how many nights** they camp.
- **Age distribution** (young adults, families, seniors) and **income distribution** of campers in the Project Area.
- **Substitution effects:** whether campers would (a) stop visiting, (b) shift to more distant BLM lands (increasing impacts elsewhere), (c) crowd remaining areas, or (d) move into informal/unpermitted camping patterns.

A socioeconomics analysis that focuses primarily on nearby communities and day visitation, without a rigorous camper profile, will systematically undercount impacts on the very groups most dependent on dispersed camping: young adults, senior citizens on fixed incomes, families trying to recreate affordably, seasonal workers, and other economically disadvantaged users.

While I was doing field visits, I talked to several people using the area. I met with one couple in one of the sites for quite awhile that was quite familiar with the plan to close the dispersed camping. They are both climbers that spend 6-7 months each year working in the area, moving from site to site on a daily basis. One of the individuals works as a guide in Zion, and she stated plainly that incurring fees for camping would have a high impact on their ability to visit the area. I was so motivated by their story that I recorded a short [video interview with them that is can be watched here](#). This is particularly important because the Draft EA's preferred tools (fee-based developed campgrounds and acreage-scale restrictions) are precisely the tools most likely to shift costs onto the public.



UPLA urges BLM to correct this flaw by conducting (at minimum) a short, targeted data effort during the EA process and/or as a pre-decisional management requirement: campground/dispersed occupancy monitoring, voluntary demographic sampling, and an analysis of fee sensitivity. A reservation/permit system can also generate these data while improving compliance.

**Charging fees for all Hurricane Cliffs camping risks pricing out lower-income users - keep Gooseberry designated dispersed camping fee-free and extend affordability protections region-wide**

The Draft EA proposes that developed campgrounds would be “designated as a fee area” and approved through a site business plan, with proposed fees generated using a Fair Market Value Fee Calculation Method (BLM, 2025a, p. 9). The Draft EA also proposes Gooseberry Mesa designated dispersed campsites and states that the BLM’s “current intent” is to keep them free - while reserving the discretion to establish fees in the future (BLM, 2025a, p. 10).

UPLA supports the concept of developed campgrounds as a choice in the recreation spectrum and agrees that some fee collection can be appropriate when a site provides amenities that meet federal fee criteria. However:

- Applying a fee-centric approach in Hurricane Cliffs, while leaving Gooseberry dispersed sites free, risks pushing lower-income users into fewer areas and increasing crowding/conflict.
- Broadly restricting dispersed camping (13,943 acres) while expanding fee sites can function as an affordability squeeze: as free options shrink, users are effectively compelled into higher-cost options or displaced farther away (BLM, 2025a, pp. 3, 11, 22–26).

UPLA urges the BLM to adopt an explicit affordability principle: **developed campground fees should not be used, intentionally or functionally, to eliminate the region’s affordable dispersed camping opportunities.** Dispersed camping in the Hurricane Cliffs / Gooseberry / Smithsonian Butte region is not a niche activity. It is foundational to how people access the area for:

- rock climbing and trail-system use (including day use that becomes overnight use due to travel distance or early start times),
- day hiking and extended backpacking staging,
- OHV and overland recreation,



- equestrian backcountry excursions, and
- family and group outings that rely on flexible, low-cost overnight options.

When BLM reduces dispersed camping across large acreages, the impact is not merely “different recreation.” It is often no recreation for people who cannot absorb added fees or cannot secure limited developed sites during peak seasons.

**The “Fair Market Value” fee method is likely to import high regional prices - this is inconsistent with equitable access and the EA’s own socioeconomic findings**

The Draft EA states campground fees would be generated using the Fair Market Value Fee Calculation Method (BLM, 2025a, p. 9). This method typically references comparable local or regional camping prices, often in high-demand gateway communities where scarcity and tourism drive prices upward.

UPLA’s concern is straightforward: competitive fees in the Zion region tend to be high - and that price signal does not reflect the BLM’s multiple-use mandate or the public-interest purpose of providing broad recreation access on public lands. The Draft EA itself recognizes cost-of-living pressures and the prevalence of seasonal/lower-wage employment that may be linked to reliance on camping (BLM, 2025a, p. 41). A fee structure pegged to high market comparables will predictably and disproportionately burden:

- seniors on fixed incomes,
- young adults and students,
- families managing recreation costs, and
- lower-income local residents and seasonal workers
- most, if not all, of the fee based camping in the area is for facilities with considerable amenities. I don’t think it will even be possible to find comparable camping to the low amenity camping offered by BLM

BLM has discretion in how it designs fee programs and must comply with governing fee authorities and processes (Federal Lands Recreation Enhancement Act; BLM recreation fee policies) (BLM, 2024; DOI, 2012). UPLA urges BLM to commit - now, in the decision framework - to **low, predictable, public-friendly fee ceilings** and to avoid “tourism market pricing” that converts public land camping into a quasi-private commodity.

**Dispersed camping is not the problem; unmanaged impacts are - and BLM has proven tools to manage dispersed camping without eliminating it**



The Draft EA correctly identifies real impacts associated with unmanaged dispersed camping: soil compaction, vegetation loss, trash/human waste, and user-created fire rings (BLM, 2025a, pp. 22–23). UPLA does not minimize these issues. But eliminating dispersed camping across large areas is not the only, nor the best, way to address them.

### **BLM success story: Alabama Hills National Scenic Area (California)**

A strong example of managed dispersed camping is BLM’s Alabama Hills program. The BLM’s Alabama Hills Manager’s Report describes substantial implementation progress on dispersed camping management actions designed to preserve scenic values while continuing camping access (BLM, 2023). Rather than a simple closure model, BLM used tools including site designation, concentrated-use management, and on-the-ground implementation to address impacts while maintaining public access.

This is directly relevant to SR9 because it demonstrates that, even in a high-demand landscape with sensitive resources and intense visitation pressure, BLM can actively manage dispersed camping in a way that supports both stewardship and recreation.

### **Research and policy support for a spectrum approach**

Outdoor recreation planning best practice generally favors a spectrum of opportunities - from developed sites to semi-primitive and dispersed experiences - because different users, activity types, and income levels rely on different settings. The Draft EA itself implicitly acknowledges this by proposing both developed campgrounds and designated dispersed sites (BLM, 2025a, pp. 9–10). UPLA urges BLM to embrace that spectrum fully by retaining dispersed camping as a managed, permitted use, not eliminating it across expansive acreages.

**UPLA does not believe there is a purpose or need to restrict dispersed camping in the 13,943 acres, but if BLM determines that capacity control is required, UPLA recommends an alternative: retain dispersed camping under a simple online reservation/permit system with a minimal fee covering the full 14-day limit**

UPLA’s recommended path forward is practical, enforceable, and consistent with the Draft EA’s stated objectives of sanitation, safety, resource protection, and improved visitor experience (BLM, 2025a, pp. 21–26):



1. **Proceed with developed campgrounds** (Flagstone Quarry and Gooseberry Mesa) as proposed, including sanitation and infrastructure improvements, sited to avoid/minimize resource conflicts (BLM, 2025a, pp. 9–10; Table 3.2-2, p. 20).
2. **Retain all existing dispersed camping opportunities** in the Project Area rather than converting ~13,943 acres to “limited to designated camping areas” as a default condition (BLM, 2025a, pp. 3, 11; Appendix A, Map A-5).
3. **Implement a user-friendly online reservation/permit system for dispersed camping** that:
  - imposes a **minimal fee** (e.g., **\$1** per permit) that covers the **full 14-day maximum duration** for localized dispersed camping;
  - allows use across the Project Area (e.g., Hurricane Cliffs for a few nights, then Gooseberry) under the same permit;
  - enables BLM to cap the number of dispersed permits by zone if monitoring shows unacceptable impacts;
  - provides a clear enforcement and accountability mechanism for overstays beyond the 14-day maximum; and
  - generates objective data (camping nights, occupancy, length of stay, and basic voluntary demographic information) to fix the EA’s baseline-data gap.

This approach directly resolves the Draft EA’s omission of camping statistics, avoids overbroad closures, improves enforceability, and protects affordable access. It also aligns with the Draft EA’s acknowledgment that designated dispersed camping can be actively managed (BLM, 2025a, p. 22) and that the BLM is already balancing resource protection with recreation under FLPMA (BLM, 2025a, p. 21).

## **Closing**

UPLA supports BLM’s goal of improving recreation infrastructure and reducing sanitation and safety issues in the SR9 corridor. We also support the addition of developed campgrounds as an important enhancement for regional access, public safety, and stewardship (BLM, 2025a, pp. 9–12). But we urge BLM not to pursue these improvements by eliminating dispersed camping across a sweeping 13,943-acre footprint—particularly when the Draft EA does not document camping-night baselines and when proven BLM management models exist that protect resources *and* preserve access.

**The legally and procedurally appropriate call to action for the BLM is clear: retain all existing dispersed camping under a simple, user-friendly online reservation/permit system with a minimal fee that covers the full 14-day maximum duration for localized dispersed**



camping - while proceeding with developed campgrounds as a complementary improvement to meet rising recreation demand, improve sanitation and safety, and expand sustainable access for the public.

Thank you for the opportunity to comment and for your continued work managing public lands for multiple use and sustained yield.

Utah Public Lands Alliance would like to be considered an interested public for the SR9 Campground Management project. Information can be sent to the following address and email address:

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Sincerely,

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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

### **References**

Bureau of Land Management. (2023). *Alabama Hills 2022 manager's report*. U.S. Department of the Interior. [Bureau of Land Management](#)

Bureau of Land Management. (2024). *FLREA revenue and spending plans*. U.S. Department of the Interior. [Bureau of Land Management+1](#)



Bureau of Land Management. (2025a). *SR9 Campground Management: Preliminary environmental assessment (DOI-BLM-UT-C030-2025-0019-EA)*. St. George Field Office, Utah. [Eplanning](#)

Institute of Outdoor Recreation and Tourism. (2023). *Utah outdoor recreation strategic planning materials (referenced in SR9 Draft EA)*. (Cited within BLM, 2025a). [Eplanning](#)

National Park Service. (2025). *Zion National Park visitation statistics (2014–2024)*. (Cited within BLM, 2025a). [Eplanning](#)

U.S. Department of the Interior. (2012). *Implementation of the Federal Lands Recreation Enhancement Act: Triennial report 2012*. [doi.gov](http://doi.gov)