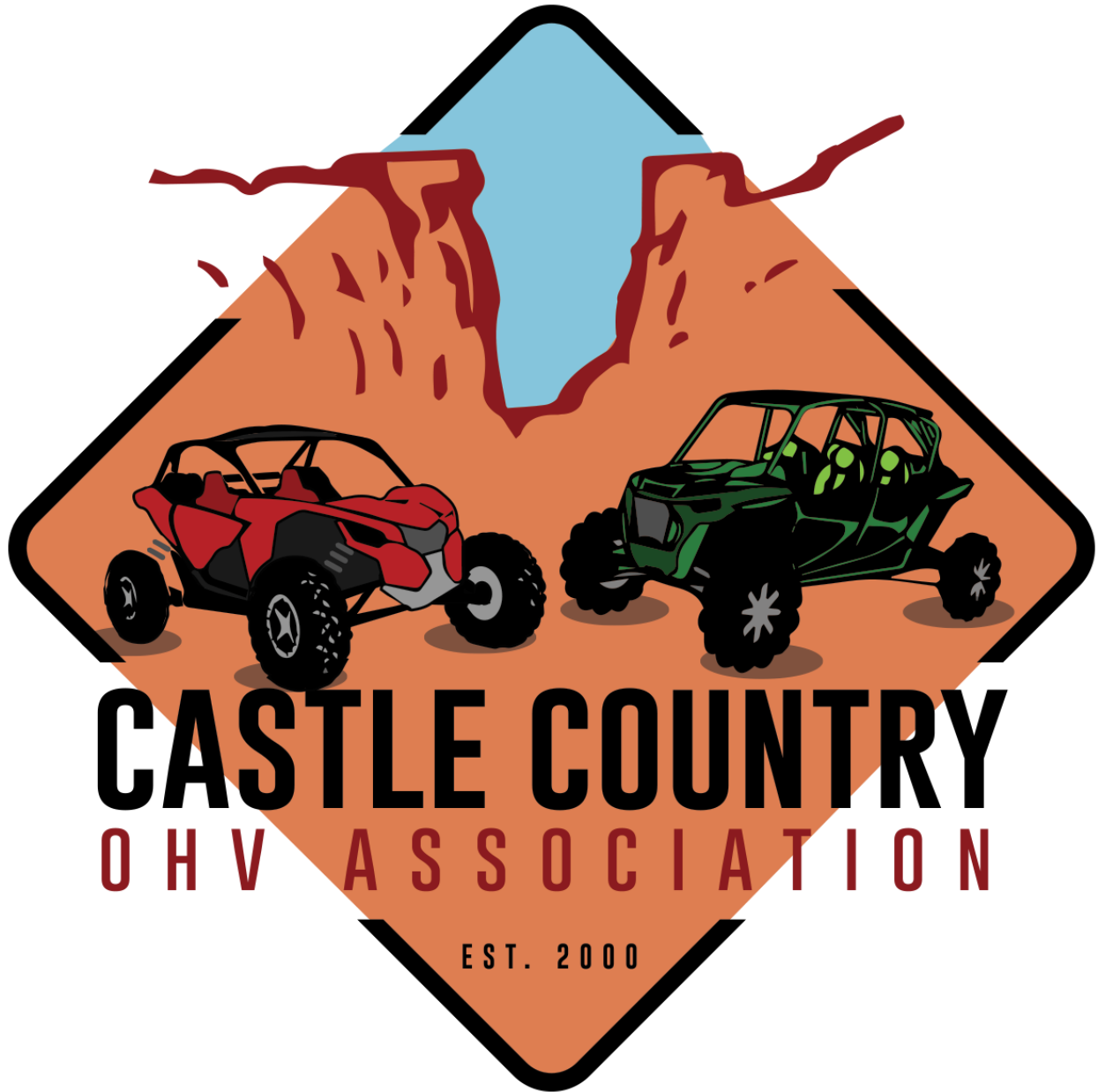




July 21, 2026

## **Dinosaur North TMP Comments**

## Introduction

The Castle Country OHV Association (CCOHVA) was established in 2000. The association currently averages about 125 paid family memberships and is represented by members throughout the State of Utah and neighboring states, with a strong presence across Utah. CCOHVA participates in yearly BLM trail maintenance and cleanup projects and supports the Tread Lightly Principles of trail use. We have maintained special use permits with the BLM in the Price Field Office. We promote responsible and safe off highway recreational use of public lands.

## Global Statement

Alternative D (Access) opens 99% of the route network — consistent with how this land is actually being used today and with Executive Order 14408, which directs BLM to remove unnecessary restrictions on federal land access. Like Alternative C, routes in 2008 OHV-Closed areas require a concurrent RMP amendment. Castle Country OHV Association (CCOHVA) supports Alternative D.

Many of the routes at issue were excluded from designation in the 2008 RMP because they crossed areas assigned restrictive management labels, including Lands with Wilderness Characteristics, Areas of Critical Environmental Concern, Wilderness Study Areas, Natural Areas, and similar administrative categories. CCOHVA believes those labels should not be used as a blanket reason to eliminate long-standing public access, especially where routes are established, visible, and still relied upon by local users.

**Lands with Wilderness Characteristics (32 miles):** CCOHVA supports keeping these 32 miles available for responsible motorized use. These routes were not designated in 2008, yet they have continued to serve real access needs on the ground. Alternative D recognizes that existing use and keeps the full 32 miles open, while Alternative B would leave only 2 miles available.

**BLM Natural Areas (108 miles):** The seven BLM Natural Areas in this TMA include 108 miles of routes that matter to recreationists, hunters, livestock operators, and local communities. These areas are the result of BLM planning decisions, not congressional Wilderness designations, and they can be addressed through the current planning process. CCOHVA supports Alternative D because it keeps all 108 miles open instead of reducing access to only 8 miles under Alternative B.

**Wilderness Study Areas (7 miles):** Diamond Breaks and West Cold Springs include 7 miles of routes within Section 603 Wilderness Study Areas. Because the EA states these routes cannot move forward without a formal plan amendment, CCOHVA asks BLM to address that amendment directly rather than allowing procedural barriers to become permanent closures.

**Browns Park ACEC (53 miles):** Within the Browns Park ACEC, Alternative A and Alternative B provide nearly the same access outcome, keeping 25 miles open and closing 28 miles. CCOHVA supports Alternative D because it keeps all 53 miles available and better reflects the public's need for practical, connected access.

**Green River Access:** Access to the Green River is important for recreation, emergency response, dispersed use, and traditional public enjoyment of the area. Alternative A would leave only 7 of 27 Green River access routes open, while Alternative D keeps 26 of 27 available. CCOHVA supports the alternative that maintains meaningful access.

**Alternatives C and D require a plan amendment.** The EA recognizes that motorized use in 2008 RMP OHV-closed areas cannot be authorized without a plan amendment. CCOHVA urges BLM to pursue that amendment alongside the TMP decision so that existing, responsible access can be properly evaluated and retained where appropriate.

**Alternative A does not reflect the actual status quo.** On paper, Alternative A may appear to continue the 2008 designations, but on the ground it would remove approximately 420 miles of routes that remain in active public use. CCOHVA believes BLM should evaluate the

real-world transportation network rather than treating outdated paper designations as the only baseline.

**Route closures must be based on documented issues, not assumptions.** The EA discusses the need to minimize conflicts, but it also indicates that user conflict within the TMA is assumed rather than specifically documented. CCOHVA supports responsible management, but assumed conflict should not be used as a substitute for site-specific evidence when deciding whether to close established public routes.

CCOHVA asks BLM to evaluate this travel plan in light of the EXPLORE Act's direction to expand, where appropriate and consistent with law, both motorized and nonmotorized recreation opportunities on federal lands managed by BLM and the Forest Service. A decision that removes existing routes from public use would move the planning effort in the opposite direction by reducing the practical access available to families, local residents, hunters, visitors, and responsible OHV users. For that reason, CCOHVA believes the current RMP should be amended as part of this process so the final decision can better align with Congress's direction to maintain and improve outdoor recreation access.

Outdoor recreation is not a side issue for Utah's rural communities; it is part of the local economy and part of the way people connect with these landscapes. National data from the U.S. Bureau of Economic Analysis shows outdoor recreation contributing more than \$1 trillion in economic activity in 2022, and that value is felt on the ground in places such as Vernal and surrounding communities where visitors buy fuel, food, lodging, parts, permits, and services. Dispersed motorized routes are especially important because they provide low-cost access for a wide range of users, not just those using developed sites. Closing routes would not simply change lines on a map; it would reduce visitation, limit local opportunity, and place added pressure on small businesses and communities that depend on continued public access.

## CCOHVA's Position

Castle Country OHV Association supports Alternative D and asks BLM to move forward with the necessary RMP amendment so long-standing access can be retained through a transparent planning process. These routes provide important connections for OHV recreation, hunting, camping, rockhounding, livestock operations, river access, and access to public land. CCOHVA encourages BLM to choose the alternative that best reflects current use, local knowledge, and continued responsible access for the communities and visitors who depend on this landscape.

## State Trust Lands

Every registered OHV operator in Utah contributes \$1.50 per machine to State Trust Lands — a fee that functions effectively as a use or trespass charge for travel across those parcels. On its face, \$1.50 may appear modest. But with more than 230,000 OHV machines registered across Utah as of 2021, that per-machine fee collectively exceeds \$350,000 annually. That is not a trivial sum, and it reflects a genuine economic relationship between the OHV community and State Trust Lands. Given that State Trust Lands account for roughly 10% of Utah's total land area, the CCOHVA has a direct and meaningful stake in ensuring that recreational access to these lands is protected.

What is often overlooked in travel planning discussions is that a binding federal judicial mandate — one that predates the 2017 settlement agreement — already governs land manager obligations with respect to State Trust Land access. That mandate flows from *State of Utah v. Andrus*, commonly known as the Cotter Decision, which established that land managers must ensure access to State Trust Land sections sufficient to allow for full economic development of those parcels. The OHV fees paid directly to State Trust Lands are not incidental — they represent documented, quantifiable economic activity tied to these lands. That revenue ultimately flows to Utah's public school system, giving every OHV user who rides those routes a legitimate and tangible connection to the educational welfare of Utah's children.

When it comes to determining what constitutes adequate access to State Trust Lands, the bar must be set high. A token corner crossing or a single limited entry point is not sufficient. Natural topography and geographic constraints already reduce the number of viable access corridors in many areas — further restricting routes through closure compounds what geography has already limited. The BLM is not the appropriate body to select winners and losers among access routes to lands that belong to the State of Utah and its citizens. These are not federal lands. The State and its citizens have an inherent right to reach them, and that right should not be filtered through federal route decisions. State Trust Lands exist to serve Utah's residents and to generate financial support for the state's public schools — a purpose that demands broad, protected access, not federal gatekeeping.

## RS2477

The CCOHVA's position on RS2477 routes is straightforward: every one of them must be opened. A District Court has already ruled, granting legal ownership of these routes to the county and the State of Utah. That ruling is binding, and we expect the BLM to act in full accordance with it — not to relitigate what the courts have already decided. These corridors are not abstract lines on a map. They represent access that the residents of Emery County and the broader citizenry of Utah have relied upon and have a legal right to use. Honoring the court's decision is both a legal obligation and the right thing to do for the communities these routes serve.

1. N1260: Built road; access to a large section of land; viewpoint; hunting; OHV recreation; road continues
2. N1078: Connects roads open in Alt C; camping; hunting; access to public land; OHV recreation
3. N848, N847, N1354: Camping; hunting access; OHV recreation; access to public land
4. N252, N243, N1474, N251, N247, N246, N241, N1469, N1468: Hunting; rockhounding; livestock infrastructure; camping; OHV recreation
5. N121, N123: Camping; hunting; access to public land; OHV recreation
6. N154, N153, N1454, N149: Hunting; rockhounding; livestock infrastructure; camping; OHV recreation; access to public land

7. N483, N475, N1401: Hunting; rockhounding; livestock infrastructure; camping; OHV recreation; access to public land
8. N509, N507: Hunting; rockhounding; livestock infrastructure; camping; OHV recreation; access to public land
9. N079: Hunting; rockhounding; livestock infrastructure; camping; OHV recreation; connectivity; access to public land
10. N072, N073, N075: Hunting; rockhounding; livestock infrastructure; camping; OHV recreation; connectivity; access to public land
11. N1459: Hunting; rockhounding; livestock infrastructure; camping; OHV recreation; access to public land
12. N039: Hunting; rockhounding; livestock infrastructure; camping; OHV recreation; access to public land
13. N042, N045: Hunting; rockhounding; livestock infrastructure; camping; OHV recreation; connectivity; access to public land
14. N036: Hunting; rockhounding; livestock infrastructure; camping; OHV recreation; connectivity; access to public land
15. N365: Hunting; rockhounding; livestock infrastructure; camping; OHV recreation; connectivity; access to public land
16. N362: Hunting; rockhounding; livestock infrastructure; camping; OHV recreation; connectivity; access to public land

## **Castle Country OHV Association Board**

**Jerace Glover**

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**Cynthia Yerke**

**Dylan Robinson**

**Dale Maxfield**