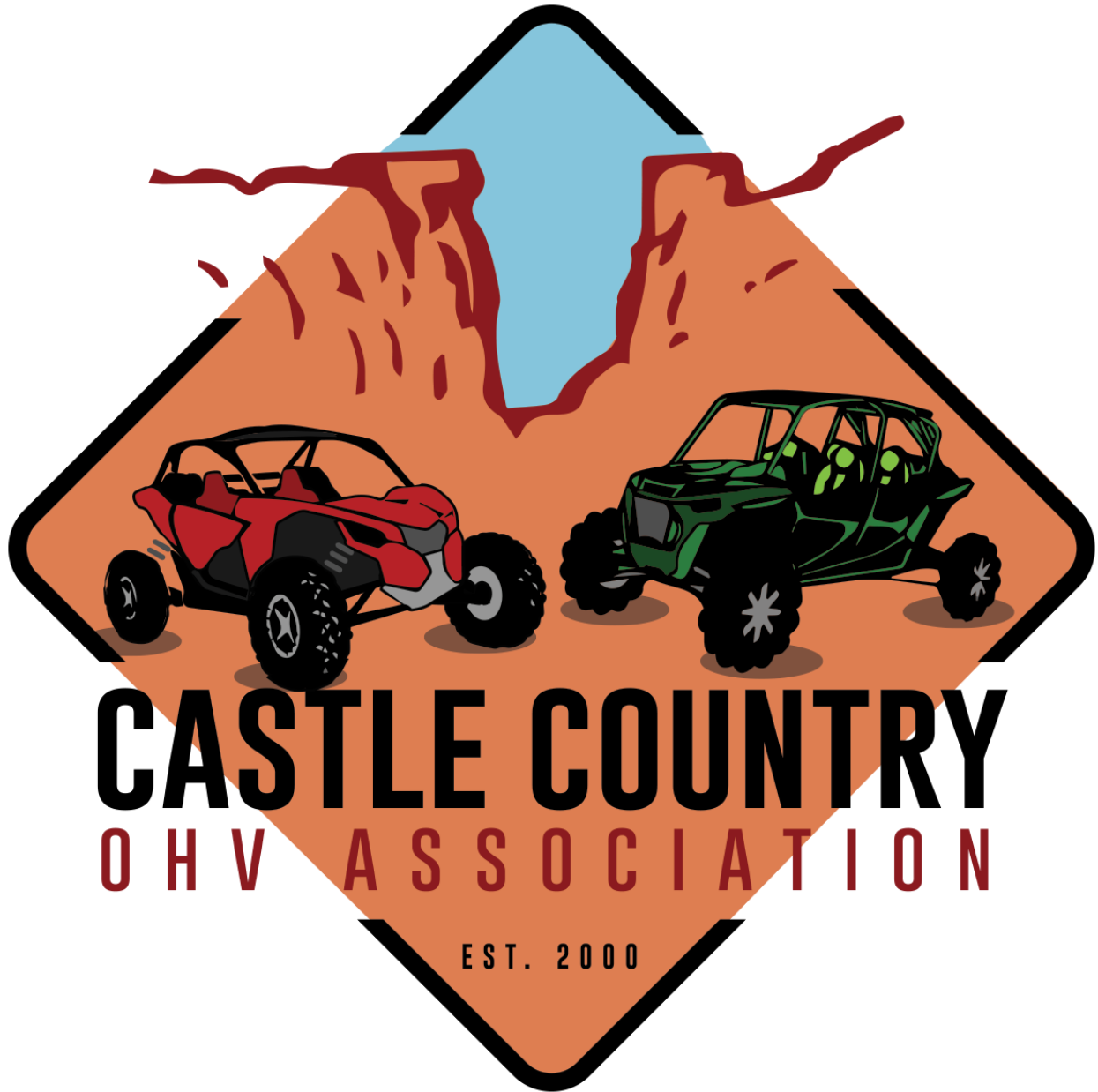




July 12, 2026

Trail Canyon TMP Comments

The comments made on each route are based upon personal experiences of users of the Castle Country OHV Association.

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

The Castle Country OHV Association supports a modified version of Alternative D that keeps certain additional routes open where they are needed for safety, access, and recreation. The Environmental Assessment's Purpose and Need section states that FLPMA directs the BLM to manage, develop, and enhance public lands in a manner that protects resources, promotes user safety, and minimizes conflicts among users. However, the route reports for many routes proposed for closure repeatedly identify no known user conflict. The BLM should therefore focus on maintaining responsible public access and maximizing multiple-use opportunities rather than reducing access to address conflicts that have not been documented. The Trail Canyon Travel Management Area is an important public landscape that should continue to provide existing levels of access. Because the area is surrounded by Grand Staircase-Escalante National Monument and Zion National Park, it offers motorized recreation opportunities that are highly restricted in those adjacent designated areas. Alternative D most closely aligns with current management direction and better supports the BLM's multiple-use mandate. As explained in the individual route comments below, several routes proposed for closure should remain open.

The BLM should also ensure that this plan is consistent with the EXPLORE Act, which directs federal land managers to seek additional opportunities, as appropriate and consistent with existing law, for both motorized and nonmotorized access and recreation on federal lands and waters administered by the Forest Service and the Bureau of Land Management. A plan

that substantially reduces the available route network would reduce public access and recreation opportunities, contrary to the intent of that provision.

Outdoor recreation is a major economic driver. The U.S. Bureau of Economic Analysis reported that outdoor recreation generated more than \$1 trillion in nationwide economic activity in 2022. Maintaining access to both dispersed, free recreation and developed recreation is essential to serving a broad range of public needs and preferences. Utah, and Kane County in particular, rely heavily on motorized recreation as part of their local economies. Closing routes in the Trail Canyon area would negatively affect small communities that depend on recreation-related visitation and spending.

CCOHVA supports keeping routes within Wilderness Study Areas open where doing so is consistent with Alternative D. Many of these routes existed before the WSA designations and continue to provide important access to historic sites, scenic areas, and long-established recreation opportunities. CCOHVA strongly opposes Alternative B. Closing 141 miles of routes—nearly one-third of the route network—would eliminate access to some of Kane County’s most valued recreation terrain. Alternative B would close all primitive routes within the five Wilderness Study Areas in the Travel Management Area, all routes in BLM Natural Areas, and 81% of routes on lands with wilderness characteristics. These closures are not proportionate to documented resource impacts and would eliminate recreation opportunities that have been legally available for decades.

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.

Coral Pink Sand Dunes / White Cliffs Area

Any closures within this area can compress users of the state park onto fewer routes and reduce experiences outside of Coral State Sand Dunes State Park.

Route 50 / K1050 / South Fork Indian Canyon: This provides access to Lamb Springs a local hangout, camping area, and access to Coral Pink Sand Dunes as well as to Lamb Point and Hell Dive Canyon. This is a main road into Lamb Springs and is well defined and has barrier running along it to eliminate any offroad travel. This route needs to remain open to provide access to a couple of the premier trails of the area. It also provides access to the hiking trail head that leads to the South Fork Indian Canyon Petroglyph and Pictograph site.

Route 51 / K1035 / Sand/Lamb Point Loop Road: Castle Country OHV strongly suggests keeping this route open. It is one of the premier routes of the Trail Canyon area. It provides excellent views from the top around Lamb Point. It also offers some more challenging trail opportunities. From sand to sandstone climbs. It also allows us to create a loop with trail 52 through the juniper trees and some fun tight twisty trails. Trail 51 provides access to Hell Dive Canyon. This offers a short hike to some of the most impressive pictographs and petroglyphs you are going to see in the area, along with giant grind stones like none you have ever seen anywhere else. The start out by Lamb Springs has been a favorite for locals for decades, for camping and access to Coral Pink Sand Dunes. The entire loop is well defined and there is only one trail as its tight through the trees.

Route 52 / K1045 / Hell Dive Canyon Road – Creates the looping opportunity with trail 51 to access the Hell Dive Canyon Petroglyphs and Pictographs. The road is well defined and is used regularly. Castle Country OHV Strongly suggests keeping this route open. It provides a more expert level of experience for those wanting a little tougher challenge.

Route 53: Cottonwood Canyon is a well-traveled route that provides access up to Indian Canyon from the bottom side of the cliffs. You traverse through the wash in the bottom. This

is the only trail that comes up through the bottom, and we strongly encourage the BLM to keep it open.

Route 54A: Route 54A needs to remain open as it is the option to connect a loop. If this trail gets closed, then you eliminate the looping option and greatly impair the user experience. For this small 1-mile section of trail that is currently used to remain open, it provides endless benefits to user groups in the area for greater experience.

Route 32D: This route is the main route to allow any sort of looping routes for the entire area south of Coral Pink Sand Dunes. It connects routes 32, 32B, and 32C. Without this route you can no longer create any loop in the area and all the routes become an in and out. We suggest keeping all these routes open (**31J, 32CC, 32X, 32Z, 32D, 32E**), while 32D is critical for user experience.

Barracks / East Fork Virgin River / Mt. Carmel / Elephant Cove / Harris Mountain

This area includes the most popular and economically beneficial trail of the entire Trail Canyon area. Closing any of the Barracks Trail and routes that provide the connections to create a loop would place undue hardship onto Mt. Camel, Kanab, and Kane County Tourism as a whole.

Route 70WSA / K1600: CCOHVA strongly encourages that trail 70WSA remains open for its entire length. It provides access to SITLA, as well as continuing through its entire length. It provides the sole access to the Poverty Flat area. This is a favorite with hunters for many generations. It ends with an incredible viewshed of the White Cliffs.

Route 20WSA / K1300 / The Barracks: This trail receives the highest level of OHV use in the area. It follows the East Fork of the Virgin River wash and contributes meaningful economic activity to Mt. Carmel Junction, Kanab, and Kane County. As the area's best-known premier trail, it offers an outstanding canyon experience, is well defined, and is also used by bighorn sheep hunters. CCOHVA strongly urges the BLM to keep this important route open, as closing it would create unnecessary economic harm for Kane County.

Route 20M / K1293: CCOHVA recommends leaving route 20M open as it is a well-traveled route that ends at a pristine overlook of Rock Canyon. This is the only option to obtain the view of the canyon.

Route 20 / K1300 / Elephant Cove Road: This route is one of the most used and best-known routes in the entire Trail Canyon area. It is extremely well used and frequented by recreationists of all kinds, from OHV, to Jeeps, to hunters, hikers, and bikers. This route provides access from the south to 20WSA which is the premier route of the entire Trail Canyon area.

Route 48: CCOHVA strongly recommends keeping Route 48 open because it provides the only connection between the highly popular Barracks Trail and the Clay Flats area, a commonly used staging location. This route also enables users to complete a loop over Harris Mountain and return to the opposite end of The Barracks near Elephant Gap. Without this connector, users would be required to retrace their route through The Barracks to return to their staging areas, reducing the quality and efficiency of the recreational experience.

Route 28WSA / K1400: Route 28WSA is the final segment needed to complete the highly popular Barracks Trail loop. Together with Routes 48 and 20, it allows users to travel the full loop through The Barracks rather than being limited to an out-and-back route. Maintaining this connection significantly improves recreational experience and expands route options for users. CCOHVA recommends that Route 28WSA remain open.

Route 28 / K1405: CCOHVA recommends this route remain open. It provides access out to a deadend at the edge of a canyon. It provides one of the most scenic overlooks in the entire area. Overlooking Harris Point and into Zion Canyon in the distance. This is the best overlook on Harris Mountain. It sees frequent use.

Route 40Q / K1415: CCOHVA recommends this route stay open as it provides access to an otherwise inaccessible section of SITLA land, which the BLM has to allow access to. It also

provides an incredible viewshed of Bay Bill Canyon, that users do not have a chance to experience from any other trail.

Route 18WSA / K1290: This route begins on SITLA land and provides the only opportunity to view The Barracks from the top of the canyon. It offers an exceptional and unique viewshed that significantly enhances the user experience. CCOHVA encourages the BLM to keep this route open.

Route 25 / K1280 / South Virgin Sands Road: This historic route is associated with the Shunesburg Mail Drop and should extend to the canyon rim, as it did when mail was lowered to Shunesburg. The overlook offers a breathtaking view into Zion National Park, and the route's historic significance supports keeping it open. The route remains visible through the wash to the former cable-and-hoist location, which once saved travelers the long trip around from Kanab.

Route 19A: CCOHVA recommends that route 19a remains open as it provides the access to the Warriors Walk Trailhead. This is a popular and cultural stop.

Route 19 / K1225: CCOHVA recommends that route 19 remain open as it provides access to the historical Shunesburg Mail Drop site as well as the Warrior Walk trail. It allows users to create a loop between these popular cultural sites.

Route 40B: CCOHVA recommends keeping route 40B open because it is well defined and will not recover. It provides access to a ridge that no other route does. This is a favorite spot for hunters for the views it provides of surrounding areas for spotting.

Routes 67/67A/67B/67C/67D: CCOHVA recommends keeping these routes open. They are all currently in use by motorists, hunters and others. This area is a top area for mule deer hunters and is heavily used during that time. My family personally calls this the "Nook" because it is one of our favorite areas to hunt. It is also used for wood gathering as well, due to being railed many years ago and having downed good cedar wood.

Mineral Area

This is a popular area for mule deer hunters. It is also a little more quiet area for hiking and biking that provides meaningful access to many overlooks and viewsheds. Such as Mineral Gulch. **Route 72** provides many of these views. There is low observed erosion on these trails and CCOHVA recommends they stay open.

Route 73Q / All Route 73: CCOHVA strongly recommends keeping Route 73Q and all Route 73 variations open. These routes provide unique access to views of Mineral Gulch that are not available from any other route. Route 73Q is also a valued route for mule deer hunters, while the related Route 73 segments provide access to the broader Mineral area. Local users have long relied on this area for camping, hunting, and scenic recreation, including exceptional viewpoints of Parunuweap Canyon and the White Cliffs.

North Fork / Zion Narrows Access

This area includes numerous private cabins and is a popular destination for both local recreationists and visitors. Access to the Zion Narrows is a major economic driver for Kane County because it is one of the region's most popular canyoneering routes. Maintaining access in this area is essential. Keeping multiple routes open helps distribute use across the landscape, reducing pressure and impacts on any single trail rather than concentrating all users onto fewer routes.

Route 92X / K1730 / Orderville Gulch/Walker Gulch: Route 92X should remain open because it provides an important connection between Orderville Gulch and Walker Gulch, allowing users to complete a loop through the area. It also offers an alternative access route from North Fork County Highway to the southern portion of North Fork, reducing the need for OHV users to travel on the main county highway. This connection improves safety, supports better recreational experience, and preserves access to routes that would otherwise be difficult to reach. CCOHVA strongly encourages the BLM to keep Route 92X open due to its significant recreational value.

Route 93 / K1800 / Zion Narrows Trailhead: CCOHVA recognizes how important trail 93 is and it needs to remain open. It is the only route to the immensely popular Zion Narrows Trailhead. This is one of the top hikes in the area including Zion National Park. To close this route would severely impact tourism and the local Kane County economy. It would create even more challenges, just to get to the trailhead on an otherwise already challenging canyoneering hike. Along with providing access to private property

Peakaboo / U.S. 89 Corridor

This area includes several popular staging locations, and the connecting routes should remain open for safety reasons. These connectors are essential because they allow OHV users to access nearby trails without traveling along Highway 89. Where routes provide direct crossings or off-highway connections from the Peek-A-Boo staging area, they help reduce conflicts with highway traffic and improve overall safety for both recreationists and motorists.

Route 61A: CCOHVA strongly recommends keeping Route 61A open. This route provides important access from the Peek-A-Boo staging area to the south and west side of Highway 89, including connections to Clay Flats, The Barracks, and Coral Pink Sand Dunes. It allows users to cross Highway 89 directly rather than travel along the highway from the staging area to reach Route 61. Maintaining this route improves safety by reducing OHV travel within the highway travel lane while preserving the same recreational access opportunities provided by Route 61. This route is not in the 2020 evaluations as Route 61A, but as TC0032. In the draft evaluation report completed 11/21/19 it reads that this route is within the UDOT Hwy 89 ROW. This route doesn't appear to fall under BLM jurisdiction and should not be included, nor closed as a result of the Trail Canyon TMP. It is provided access from the newly enlarged Peakaboo staging area across the highway and is the safest route for OHV users to access the entire other side of the trail network.

Route 64T: Route 64T is an actively used connector route that provides access between the Hancock Road area and the Red Knoll area without requiring users to travel on Highway 89.

It is regularly used by SXS and ATV riders, as well as hunters. The route follows a well-defined sandy hill and serves an important safety function, similar to Route 61A, by reducing OHV travel on the highway. CCOHVA recommends keeping Route 64T open as a valuable connector route.

Canaan Mountain / Rosey Canyon

This area borders the Canaan Mountain WSA and provides important access for hiking, photography, and scenic recreation. Closing trails in this area would lengthen access routes into the WSA and make the area less accessible for users who cannot complete long hikes, including older visitors, individuals with limited mobility, and families with young children. Maintaining these routes helps preserve reasonable access to scenic destinations while supporting a broader range of public users.

Routes 11, 11A, 11B: These routes provide important access to Rosey Canyon and its scenic overlooks. They are the only motorized access routes in this area and should remain open to ensure that a wide range of users, including individuals with limited mobility, can experience this landscape. CCOHVA recommends keeping Routes 11, 11A, and 11B open to preserve reasonable public access and support inclusive recreation opportunities.

Route 11FC: Route 11FC provides important access from County Road 43 to the Class D roads in the Moccasin Mountains. It also allows users to create loops with Routes 36, 37, and 37A. Without this connection, access to these routes would be significantly reduced, and users would lose valuable looping opportunities in the area.

Route 17 / K1220 / Goat Springs: CCOHVA recommends keeping Route 17 open because it provides important access to Goat Springs, a well-used and clearly defined route. The route is also important to local cattle ranchers and provides a connection to Route 19, allowing users to create loop opportunities. In addition, Route 17 offers a more technical and engaging section for advanced users, rather than limiting travel to sandy roads. It also provides access to the Canaan Mountain WSA for users who wish to enter the area.

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