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BLM Green River District
Vernal Field Office
Dinosaur North TMP EA
170 South 500 East
Vernal, Utah 84078

Via submission on ePlanning: <https://eplanning.blm.gov/Project-Home/?id=9822eab3-cb65-f111-a824-001dd802e1e9>

RE: **Dinosaur North Travel Management Plan**
NEPA Number: DOI-BLM-UT-G010-2026-0122-EA

Dear BLM Planning Team,

Utah Public Lands Alliance (UPLA) is writing to provide public comment on the [Dinosaur North Travel Management Plan](#), hereto forward referred to as “TMP.” These comments are submitted on behalf of UPLA, its members, affiliated clubs, and volunteers who regularly recreate within the 344,822 acres of BLM-administered lands encompassed by the Dinosaur North Travel Management Area (TMA). This letter of comment shall not supersede the rights of other UPLA agents, representatives, or members from submitting their own comments; the Bureau of Land Management (BLM) should consider and appropriately respond to all comments received for the TMP.

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 and US Forest Service 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 Dinosaur North TMA throughout the future.

I, Rose Winn, am an avid outdoor recreation enthusiast and anthropologist; hiking, backpacking, 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, but also organizes and works as a volunteer on projects on public lands. UPLA, Loren, and I are also members of BlueRibbon Coalition. These comments are submitted on behalf of both me 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, as well as those submitted by Castle County OHV Association and Jerace Glover.



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* Appendix A: UPLA Member Route-Specific Feedback (accompanying document)

* TrailSaver Raw Responses: UPLA Member Route-Specific Feedback (accompanying document)



EXECUTIVE SUMMARY

Utah Public Lands Alliance (UPLA) appreciates the opportunity to provide comments regarding the Bureau of Land Management's (BLM) Draft Environmental Assessment (EA) for the Dinosaur North Travel Management Plan (TMP). UPLA recognizes the considerable effort invested by the Vernal Field Office in evaluating the existing transportation network, engaging the public throughout the planning process, and developing alternatives intended to improve travel management across approximately 223,000 acres of BLM-administered public lands. The Draft EA reflects substantial technical work addressing recreation, wildlife, vegetation, cultural resources, Areas of Critical Environmental Concern (ACECs), Lands with Wilderness Characteristics (LWCs), Wilderness Study Areas (WSAs), soils, water resources, visual resources, and other resource values that collectively comprise the multiple-use landscape entrusted to the Bureau under the Federal Land Policy and Management Act (FLPMA).

UPLA strongly supports responsible stewardship of Utah's public lands. Stewardship is not achieved through preservation alone, nor through unrestricted public use. Rather, stewardship is achieved by managing public lands in a manner that conserves natural and cultural resources while simultaneously fulfilling Congress's explicit directive that these lands remain available for multiple use and sustained yield. Motorized recreation, dispersed access, hunting, fishing, camping, sightseeing, wildlife observation, livestock grazing, energy development, scientific research, and conservation are not inherently competing land uses under FLPMA. They are complementary public values that Congress directed the Bureau to balance through informed, evidence-based planning and adaptive management.

The purpose of travel management planning should therefore not be understood as an exercise in maximizing route closures or minimizing the transportation network wherever sensitive resources are present. Rather, travel management planning exists to establish a sustainable, clearly designated, and manageable transportation system that provides reasonable public access while protecting the resources through which those routes pass. **Properly designed transportation systems serve as conservation infrastructure.** They concentrate travel onto designated corridors, reduce cross-country disturbance, improve visitor compliance, facilitate education and enforcement, improve emergency response, and allow the Bureau to monitor and manage recreation in a predictable and scientifically defensible manner. **A designated route system is therefore not simply an accommodation of recreation; it is itself a vital and indispensable resource management tool.**

UPLA believes the Draft EA represents meaningful progress toward these objectives. Compared to several earlier travel management efforts throughout the western United States, the Dinosaur



North Draft EA demonstrates greater recognition that transportation networks must be evaluated as interconnected systems rather than isolated route segments. The alternatives acknowledge that public access depends not merely upon the existence of individual routes, but upon the connectivity, redundancy, loop opportunities, destination access, emergency access, administrative functionality, and recreational experiences created by the transportation network as a whole. UPLA appreciates this systems-oriented perspective and encourages the Bureau to continue refining that approach throughout preparation of the Final EA.

Although the Draft EA represents a thoughtful and professionally prepared planning effort, UPLA concludes that the administrative record does not support the closure or decommissioning of numerous routes evaluated under the action alternatives. In many instances, proposed closures appear to rely primarily upon the geographic overlap of existing routes with mapped resource values rather than demonstrating that continued managed use of the routes would result in significant, measurable, or unavoidable adverse impacts. Sensitive resources undoubtedly deserve careful protection. However, the mere presence of wildlife habitat, cultural resources, ACECs, steep slopes, ephemeral drainages, riparian areas, Lands with Wilderness Characteristics, or other resource values adjacent to an existing designated route does not, standing alone, establish that closure represents either the most effective or the least restrictive management response.

Throughout the history of federal travel management planning, resource conflicts have often been addressed through a binary framework that presents continued public access and resource protection as mutually exclusive objectives. Contemporary recreation ecology, adaptive resource management, transportation planning, and decades of practical experience demonstrate otherwise. Numerous studies have concluded that properly designed designated-route systems, combined with education, monitoring, maintenance, seasonal management where necessary, volunteer stewardship, restoration of unauthorized disturbances, and targeted enforcement, frequently achieve superior long-term conservation outcomes compared to broad network reductions that concentrate use onto fewer remaining routes or displace recreation into surrounding areas. **Effective resource stewardship depends upon managing visitor behavior rather than simply reducing opportunities for lawful access.**

Accordingly, UPLA supports a Modified Alternative D as the preferred foundation for the Final Travel Management Plan.

Alternative D most closely fulfills FLPMA's multiple-use mandate because it generally preserves a functional transportation network while recognizing opportunities to address legitimate resource concerns through targeted management rather than widespread elimination of public



access. Relative to the other action alternatives, Alternative D better maintains regional connectivity, preserves recreational diversity, retains administrative flexibility, supports local communities that depend upon outdoor recreation, and more effectively balances the Bureau's statutory obligations toward conservation and public access. UPLA nevertheless believes that Alternative D can and should be further improved by retaining additional existing routes where the record does not clearly demonstrate that closure is necessary to avoid significant resource impacts or where reasonable mitigation measures can effectively reduce those impacts while maintaining public access.

UPLA emphasizes that travel management planning should be guided by adaptive management principles rather than assumptions of permanence. Public lands are dynamic landscapes influenced by changing environmental conditions, evolving recreation patterns, improved scientific understanding, technological advancements in route maintenance and monitoring, and changing management priorities. Consequently, route designation decisions should similarly remain adaptive. Where legitimate resource concerns exist, the Bureau possesses an extensive suite of management tools... including seasonal restrictions, educational outreach, route hardening, drainage improvements, signing, restoration of adjacent disturbances, monitoring protocols, permit conditions where appropriate, volunteer maintenance partnerships, and temporary closures... that frequently resolve localized resource issues without requiring permanent elimination of public access. **Permanent closure should therefore remain a management tool of last resort, reserved for circumstances where the administrative record clearly demonstrates that less restrictive measures cannot reasonably achieve resource protection objectives.**

Congress did not direct the Bureau to maximize one resource objective at the expense of all others. Rather, FLPMA requires the Bureau to balance multiple public values while preventing unnecessary or undue degradation of the public lands. This balancing obligation is particularly important in travel management planning because designated transportation systems facilitate virtually every congressionally recognized use of public lands. Recreationists, hunters, anglers, livestock permittees, energy operators, researchers, search and rescue personnel, firefighters, law enforcement officers, wildlife managers, tribal representatives, and Bureau personnel themselves rely upon sustainable transportation networks to safely access the landscapes they manage and enjoy. **Decisions affecting transportation infrastructure therefore have consequences extending far beyond motorized recreation alone.**

The Draft EA appropriately recognizes that recreation constitutes an important component of the planning area's character and economy. However, UPLA urges the Bureau to fully recognize recreation not simply as a discretionary public benefit, but as one of the principal uses of public



lands expressly identified by Congress under FLPMA. Outdoor recreation contributes substantially to the social, cultural, and economic well-being of local communities throughout northeastern Utah while simultaneously fostering public investment in conservation, volunteer stewardship, and long-term support for responsible public land management. The transportation network evaluated in this planning effort represents decades of recreational history, public investment, local knowledge, volunteer maintenance, and community tradition. These values deserve meaningful consideration alongside biological, physical, and cultural resource analyses when determining the appropriate balance among competing management objectives.

A recurring principle throughout this comment letter is that public access and resource conservation should not be treated as opposing management objectives. The premise that one must necessarily diminish in order for the other to succeed is inconsistent with decades of modern public land management experience, recreation ecology, and adaptive resource management. Across the Bureau of Land Management, the U.S. Forest Service, National Park Service, and numerous state land management agencies, designated transportation systems have repeatedly demonstrated that carefully managed recreation can coexist with sensitive wildlife habitat, cultural resources, watershed protection, and other conservation priorities when supported by appropriate planning, engineering, maintenance, monitoring, and public education.

Indeed, many of the landscapes that retain the highest ecological integrity today have simultaneously supported decades of lawful motorized recreation, livestock grazing, hunting, dispersed camping, timber management, mineral development, scientific research, and other multiple-use activities. These landscapes have not remained resilient because public access was eliminated. Rather, they have remained resilient because land managers established sustainable systems that directed public use in predictable ways while applying adaptive management where localized resource concerns emerged. This distinction is fundamental. The objective of travel management is not to remove recreation from the landscape wherever environmental values are present. The objective is to manage recreation in a manner that allows both conservation and public access to succeed together.

This principle is especially important because transportation systems themselves constitute an important conservation mechanism. Designated routes discourage cross-country travel, provide clear expectations for public compliance, simplify visitor education, facilitate monitoring and enforcement, reduce user-created routes, improve emergency response capabilities, concentrate maintenance activities where they are most effective, and provide predictable corridors through which public use can occur while minimizing unnecessary disturbance elsewhere across the landscape. As numerous recreation ecology studies have demonstrated, concentrating use onto sustainable designated routes frequently produces substantially lower cumulative impacts than



fragmented patterns of dispersed or unauthorized travel. Consequently, retaining appropriately located designated routes often serves conservation objectives more effectively than eliminating those routes without corresponding improvements in visitor management.

For this reason, UPLA encourages the Bureau to evaluate each proposed route designation not simply through the lens of whether resources occur adjacent to the route, but rather through the broader question of whether maintaining that route as part of a managed transportation network produces greater overall resource protection than removing it from the designated system. This systems perspective recognizes that every route performs multiple functions extending beyond the localized footprint of the travel corridor itself. Individual routes contribute to network connectivity, visitor distribution, emergency access, administrative flexibility, maintenance efficiency, recreational diversity, and public safety. Removing one segment may appear insignificant when evaluated in isolation, yet produce cascading effects throughout the transportation system that ultimately increase resource impacts elsewhere.

Accordingly, UPLA believes **the Final EA should consistently evaluate transportation corridors as components of an integrated network rather than as independent linear disturbances.** Transportation planning literature has long recognized that resilient networks depend upon redundancy, connectivity, and functional alternatives. Networks that contain reasonable redundancy are generally more capable of accommodating changing environmental conditions, seasonal closures, emergency incidents, wildfire response, maintenance activities, and shifting patterns of public use than systems reduced to a limited number of primary corridors. **Redundancy should therefore not be viewed as unnecessary duplication, but rather as an important characteristic of resilient infrastructure.**

This concept is particularly relevant throughout the Dinosaur North planning area, where recreation opportunities are dispersed across a large and geographically diverse landscape. Routes frequently function together to create loop opportunities, distribute visitation among multiple destinations, reduce two-way traffic conflicts, provide access to dispersed campsites and trailheads, support hunting and wildlife management activities, facilitate search and rescue operations, and allow administrative personnel to efficiently monitor public lands. The recreational experience associated with these interconnected transportation networks cannot be accurately evaluated by examining individual route segments in isolation. A route that appears to provide limited independent utility may nevertheless represent a critical connection between larger portions of the transportation system or provide the only practical means of maintaining safe and efficient circulation throughout a particular management area.



UPLA further believes that travel management decisions should be grounded in the best available science and supported by route-specific evidence demonstrating why a particular management action is necessary. Both FLPMA and the National Environmental Policy Act (NEPA) contemplate informed decisionmaking based upon objective analysis rather than generalized assumptions or categorical preferences. While neither statute prescribes predetermined management outcomes, both require agencies to evaluate relevant information, consider reasonable alternatives, disclose the basis for their conclusions, and articulate a rational connection between the evidence contained within the administrative record and the decisions ultimately adopted.

These procedural requirements become especially important where existing public access is proposed to be eliminated. Closing a designated route represents more than an administrative adjustment to a transportation inventory. It constitutes a substantive change in how the public may lawfully use lands held in trust for all Americans. Such decisions should therefore rest upon substantial evidence demonstrating that continued managed use would result in impacts that cannot reasonably be avoided, minimized, or mitigated through less restrictive management approaches. General references to mapped wildlife habitat, potential cultural resources, hydrologic features, slopes, vegetation communities, or other environmental characteristics, without corresponding analysis demonstrating actual route-specific impacts and why those impacts cannot reasonably be addressed through adaptive management, provide an incomplete basis upon which to permanently eliminate lawful public access.

This observation should not be interpreted as minimizing the importance of sensitive resources. On the contrary, UPLA fully supports careful protection of wildlife habitat, riparian systems, cultural resources, and other environmentally significant areas. Rather, UPLA emphasizes that resource sensitivity alone does not dictate a single management outcome. Many of the planning area's most valuable resources have coexisted with designated transportation corridors for decades. The relevant management question therefore becomes whether continued managed use of those corridors is demonstrably incompatible with long-term resource protection, or whether targeted mitigation measures can adequately protect the identified values while preserving public access. In many instances, the Draft EA acknowledges existing resource conditions without fully demonstrating that continued route designation would result in significant adverse effects that cannot be effectively mitigated.

Similarly, proximity should not be confused with causation. The existence of a route within mapped habitat, adjacent to an ephemeral drainage, crossing a particular soil type, or located within a broader landscape supporting sensitive resources does not independently establish that the route is responsible for measurable ecological degradation or that closure would



meaningfully improve resource conditions. Resource management decisions should instead distinguish between potential effects, documented impacts, cumulative influences, and demonstrable cause-and-effect relationships supported by field observations, monitoring data, scientific literature, and professional judgment. This distinction is essential to ensuring that management actions remain proportional to the actual environmental issues they seek to address.

Throughout this comment letter, we urge the Bureau to continue strengthening the analytical connection between identified resource concerns and proposed management actions. Where route closures are recommended, the administrative record should clearly explain the specific resource objectives being advanced, the evidence demonstrating that continued managed use is incompatible with those objectives, the alternatives considered, the mitigation measures evaluated, and the reasons those less restrictive measures were determined to be insufficient. Such analysis not only strengthens the legal defensibility of the Final EA, but also enhances public confidence that travel management decisions are based upon objective evidence rather than generalized assumptions regarding motorized recreation.

UPLA also encourages the Bureau to recognize the substantial conservation value contributed by the motorized recreation community itself. Across Utah and throughout the western United States, organized off-highway vehicle organizations contribute thousands of volunteer hours annually toward trail maintenance, route signing, erosion control, habitat restoration, invasive species management, fence repair, archaeological site protection, visitor education, and monitoring efforts conducted in partnership with federal, state, county, and local land management agencies. **These partnerships illustrate that responsible recreationists are not merely users of public lands; they are active participants in their stewardship.** The Final Travel Management Plan should therefore seek to leverage this stewardship capacity by maintaining a transportation system that remains manageable, sustainable, and capable of supporting continued volunteer investment rather than unnecessarily reducing opportunities for collaborative conservation.

For these reasons, we recommend that the Bureau adopt a Modified Alternative D that:

- Retains additional existing designated routes where closure is not clearly supported by substantial route-specific evidence;
- Evaluates transportation corridors as components of an interconnected network rather than isolated segments;
- Relies upon adaptive management, monitoring, and targeted mitigation before considering permanent closures;
- Fully recognizes recreation as a congressionally protected principal use of the public lands under FLPMA;



- Incorporates the best available scientific information and route-specific field data into all designation decisions;
- Carefully evaluates the cumulative effects of reduced network connectivity on recreation, public safety, administrative access, and local communities; and,
- Continues building a transportation system that simultaneously advances conservation, responsible recreation, and the multiple-use mission established by Congress.

The analyses that follow expand upon these recommendations in detail. Collectively, they demonstrate that a thoughtfully refined Alternative D can provide a durable framework for protecting the exceptional natural, cultural, and recreational resources of the Dinosaur North planning area while ensuring that present and future generations continue to enjoy meaningful access to the public lands entrusted to the Bureau's stewardship.

GENERAL COMMENTS

Public Lands as a Public Trust

UPLA appreciates the BLM's commitment to evaluating the long-term management of the Dinosaur North TMA through a comprehensive planning process that considers both resource conservation and public access. Travel management planning represents one of the Bureau's most consequential planning responsibilities because transportation systems serve as the physical framework through which virtually every authorized use of public lands is exercised. Decisions regarding route designation influence not only motorized recreation, but also wildlife management, cultural resource stewardship, livestock operations, scientific research, wildfire suppression, search and rescue, law enforcement, administrative access, hunting, angling, dispersed camping, sightseeing, energy development, and countless other activities expressly contemplated under FLPMA. Consequently, transportation planning should never be viewed as a narrow recreation management exercise. Rather, it is a comprehensive public land planning process that directly affects the ability of present and future generations to experience, utilize, and steward lands held in trust for all Americans.

Congress fundamentally altered federal public land policy through enactment of FLPMA in 1976. Prior to FLPMA, much of the nation's public land policy remained rooted in disposal statutes that anticipated eventual transfer of federal lands into private ownership. FLPMA instead established that the remaining public lands generally would be retained in ownership of all American citizens, under federal management, for the benefit of both present and future generations (43 U.S.C. § 1701(a)(1)). Equally important, Congress directed that these lands be managed under the principles of multiple use and sustained yield while protecting ecological,



cultural, recreational, scenic, scientific, and economic values simultaneously (43 U.S.C. §§ 1701(a)(7), 1702(c), 1732(a)). **This statutory framework reflects an important public policy principle: public lands are neither preservation reserves dedicated exclusively to ecological protection nor commodity landscapes managed solely for resource extraction. They are national assets held in trust for diverse public purposes that must be balanced through informed, transparent, and evidence-based decisionmaking.**

The public trust embodied within FLPMA extends beyond resource conservation alone. It encompasses the public's longstanding ability to lawfully access, experience, understand, and develop a lasting stewardship ethic toward the lands owned collectively by the American people. Recreation is not merely an incidental benefit arising from public ownership. Congress expressly recognized outdoor recreation as one of the principal uses for which public lands are managed. Opportunities to hunt, fish, camp, explore, photograph, conduct scientific research, observe wildlife, travel scenic backcountry roads, and responsibly recreate through motorized and non-motorized means collectively represent tangible expressions of the public trust that federal land managers are obligated to consider alongside other statutory resource values.

Accordingly, travel management planning should begin with the presumption that lawful public access represents an important public value worthy of thoughtful consideration rather than an activity requiring justification whenever environmental resources are present. This principle does not suggest that all existing routes should remain designated irrespective of resource concerns. Nor does it diminish the Bureau's responsibility to prevent unnecessary or undue degradation of public lands. Rather, it recognizes that **conservation and public access are coequal public interests entrusted to the Bureau by Congress.** The appropriate question is therefore not whether public access should occur, but how public access can be managed in a manner that maintains ecological integrity while preserving the diverse recreational, economic, educational, and cultural benefits that arise from Americans' ability to responsibly experience their public lands.

The Draft EA appropriately recognizes many of these competing values. However, throughout the Final EA, UPLA urges the Bureau to consistently evaluate transportation decisions through the broader lens of public trust stewardship. Each route designation should be understood not simply as a decision affecting a linear transportation corridor, but as a decision affecting how millions of acres of federally managed lands remain accessible, manageable, understandable, and relevant to the citizens for whom they are held in trust.

Transportation Systems as Conservation Infrastructure



Transportation systems are frequently evaluated primarily according to their physical footprint upon the landscape. Roads and trails are often described as disturbances that fragment habitat, alter hydrologic processes, influence vegetation communities, and introduce human activity into otherwise undeveloped environments. These observations are legitimate considerations within environmental analysis. Every transportation corridor occupies physical space, modifies local conditions to some degree, and requires thoughtful management to ensure long-term sustainability. However, evaluating designated transportation systems solely through the lens of disturbance provides an incomplete understanding of the role those systems play within contemporary public land management.

Transportation infrastructure performs essential ecological, administrative, and recreational functions that frequently advance conservation objectives rather than undermine them. Properly designed designated-route systems concentrate travel onto predictable corridors, reducing dispersed impacts across the surrounding landscape. They provide visitors with clear expectations regarding where travel is authorized, thereby discouraging unauthorized route creation and minimizing uncertainty that often leads to inadvertent resource damage. They enable agencies to focus maintenance resources where they generate the greatest conservation benefit, facilitate systematic monitoring of recreation impacts, improve public education and compliance, enhance law enforcement effectiveness, and support rapid emergency response during wildfires, search and rescue incidents, hazardous weather events, and other emergencies. From a resource management perspective, designated transportation networks create order within landscapes that might otherwise experience increasingly fragmented patterns of human use.

This concept has become increasingly recognized within the disciplines of recreation ecology and landscape planning. Contemporary research consistently demonstrates that concentrating recreation within sustainable transportation corridors generally produces lower cumulative environmental impacts than unmanaged or dispersed recreation distributed across broad landscapes. Well-designed routes function as durable conduits that absorb and direct human use while protecting adjacent ecological resources from widespread disturbance. In this sense, designated transportation systems operate much like boardwalks through wetlands, designated campsites within wilderness settings, established climbing routes on sensitive cliffs, or marked hiking trails within national parks. Their purpose is not merely to facilitate visitor access; it is to direct visitor behavior in ways that improve resource protection across the landscape as a whole.

For this reason, we encourage the Bureau to view transportation systems as conservation infrastructure rather than simply recreation infrastructure. The continued existence of a designated route often represents an affirmative management strategy that protects surrounding resources by channeling public use toward locations where impacts are understood, monitored,



and manageable. Eliminating designated routes without corresponding improvements in visitor management may inadvertently increase uncertainty regarding travel patterns, reduce management efficiency, concentrate recreation onto fewer remaining corridors, or encourage unauthorized route proliferation where access demands persist. Consequently, the relevant management question should not simply be whether a route affects adjacent resources. Rather, it should be whether retaining that route within a managed transportation system produces greater long-term conservation outcomes than removing it from the designated network.

This systems perspective also recognizes that individual routes rarely function independently. Every designated road or trail contributes to a larger transportation network that supports administrative operations, emergency access, visitor circulation, recreational diversity, and resource stewardship. A route that appears to provide limited utility when viewed in isolation may nonetheless perform an essential role in maintaining network connectivity, distributing visitor use across multiple destinations, reducing congestion, facilitating maintenance operations, or providing redundancy during seasonal closures, wildfire response, or emergency situations. Consequently, transportation planning should evaluate the functional contribution of routes within the context of the broader network rather than solely according to localized environmental characteristics observed immediately adjacent to individual route segments.

UPLA believes the Draft EA appropriately begins moving toward this broader systems perspective. The Final EA presents an opportunity to further strengthen that approach by consistently recognizing transportation corridors as integral components of sustainable landscape management whose value extends beyond simple recreation access. **Properly managed transportation systems are among the Bureau's most effective tools for simultaneously advancing conservation, public safety, visitor education, operational efficiency, and responsible multiple use.**

Multiple-Use Stewardship as an Integrated Management Philosophy

Throughout this comment letter, we emphasize the legal and administrative imperative for the Bureau to approach travel management through an integrated multiple-use stewardship framework rather than a framework that implicitly treats conservation and recreation as competing management priorities. The multiple-use mandate established by FLPMA does not require federal land managers to maximize any single public value. Instead, it requires thoughtful balancing of diverse and sometimes competing interests in a manner that best serves the long-term public interest. Recreation, wildlife conservation, watershed protection, livestock grazing, cultural resource preservation, mineral development, renewable energy, scientific research, scenic quality, and ecosystem resilience are not independent management programs operating in



isolation. They are interconnected components of a single public land system that must be managed holistically through informed professional judgment.

This integrated perspective reflects both the language of FLPMA and the practical realities of modern public land management. Ecological systems do not function independently of human systems, nor do recreation systems exist independently of ecological conditions. Decisions affecting transportation networks influence wildlife movement, visitor distribution, emergency response capability, local economies, volunteer stewardship opportunities, agency maintenance costs, recreational experiences, and public perceptions of federal land management. Likewise, resource management decisions affecting vegetation treatments, wildfire response, invasive species management, watershed restoration, habitat improvement, or cultural resource protection inevitably influence recreation opportunities and patterns of public use. Effective land management therefore requires recognizing these interactions rather than evaluating each resource objective within administrative silos.

One of the most significant developments in contemporary natural resource management has been the gradual transition away from single-objective planning toward integrated landscape stewardship. This approach acknowledges that healthy public lands are not achieved by maximizing one management objective while minimizing all others. Instead, resilient landscapes emerge from balanced management that recognizes ecological, economic, cultural, and recreational values as mutually reinforcing components of sustainable public land stewardship. Recreation provides opportunities for citizens to develop personal connections to public lands, supports local economies that in turn strengthen political and financial support for conservation, encourages volunteer stewardship partnerships, and fosters public understanding of natural resource management challenges. Conservation ensures that those same landscapes retain the ecological integrity necessary to sustain recreation and other public uses into the future. Neither objective is fully achieved without the other.

This philosophy is especially relevant within travel management planning because transportation systems provide the physical means through which multiple-use is implemented on the ground. Routes are not solely recreation facilities; they are shared public infrastructure supporting a broad spectrum of authorized uses. Hunters access wildlife habitat using many of the same roads utilized by livestock permittees, fire suppression personnel, biologists, recreationists, utility operators, and cultural resource specialists. A transportation system that functions effectively for one authorized user often provides substantial benefits to many others. Conversely, decisions reducing network functionality create unintended consequences extending well beyond the recreation community.



Accordingly, UPLA recommends that the Final EA consistently evaluate transportation decisions according to their contribution to overall landscape stewardship rather than their effects on individual resource categories considered independently. Management actions that simultaneously maintain public access, improve visitor compliance, facilitate restoration, strengthen monitoring, support volunteer partnerships, and protect sensitive resources should generally be preferred over approaches that achieve resource protection primarily through permanent reductions in transportation infrastructure where less restrictive management tools remain available.

This integrated stewardship philosophy does not advocate unrestricted access, nor does it suggest that every existing route should remain designated. Rather, it advocates proportional, evidence-based management grounded in the recognition that sustainable public access and long-term resource conservation are complementary objectives established by Congress under the multiple-use framework. Throughout the remainder of this comment letter, we evaluate the Draft EA through this integrated perspective, emphasizing adaptive management, scientific rigor, systems-based planning, and balanced stewardship as the guiding principles most consistent with FLPMA, NEPA, and the Bureau's enduring responsibility to manage our public lands for the benefit of all Americans.

Resilience Theory and Adaptive Public Land Management

Modern public land stewardship increasingly recognizes that ecosystems, transportation systems, and recreational landscapes are not static. Rather, they function as dynamic social-ecological systems that continuously respond to changing environmental conditions, natural disturbances, public use patterns, climatic variability, invasive species, wildfire, technological advancements, and evolving scientific understanding. Consequently, management approaches founded upon resilience theory have become central to contemporary natural resource planning because they emphasize maintaining the capacity of landscapes to absorb disturbance, adapt to change, and continue functioning over time rather than attempting to preserve a single static condition (Holling, 1973; Folke et al., 2004; Walker & Salt, 2006).

This concept has direct relevance to travel management planning. Transportation networks exist within landscapes that are themselves constantly changing. Wildfire alters vegetation communities and watershed conditions. Flood events reshape ephemeral drainages and sediment transport. Wildlife populations expand, contract, and shift distributions. Recreation demand evolves with demographics, technology, and regional access opportunities. Vegetation recovery occurs in some locations while disturbance increases in others. Scientific understanding likewise improves as agencies accumulate monitoring data and experience implementing management



decisions. Because these conditions are inherently dynamic, transportation planning should likewise embrace management strategies capable of adapting to new information rather than assuming that today's conditions necessarily justify permanent management decisions extending decades into the future.

UPLA therefore encourages the Bureau to view resilience as both an ecological objective and a management philosophy. Ecological resilience seeks to maintain the long-term health of watersheds, wildlife populations, vegetation communities, soils, and other natural resources despite changing environmental conditions. Management resilience, by contrast, reflects the agency's capacity to respond effectively as new information becomes available. Together, these complementary forms of resilience provide a framework through which public land managers can protect resources while maintaining flexibility to adjust management practices when circumstances warrant.

Travel management planning is particularly well suited to adaptive implementation because transportation systems lend themselves to monitoring, maintenance, engineering improvements, seasonal adjustments, restoration projects, and targeted mitigation. Unlike irreversible land uses, designated route systems can be modified incrementally as conditions change. Drainage improvements can reduce erosion. Route hardening can improve soil stability. Seasonal closures can address temporary wildlife concerns. Educational initiatives can improve visitor compliance. Volunteer stewardship can reduce maintenance backlogs. Monitoring can identify localized issues before they become widespread resource problems. Collectively, these management tools allow agencies to respond proportionally to observed conditions rather than relying upon permanent restrictions implemented in anticipation of uncertain future impacts.

This adaptive approach is also consistent with FLPMA's direction that the Bureau manage public lands under principles of multiple use and sustained yield while preventing unnecessary or undue degradation. Neither FLPMA nor the travel management regulations require agencies to select the most restrictive management alternative wherever environmental uncertainty exists. Instead, they provide agencies with considerable discretion to balance competing public values through informed professional judgment supported by ongoing monitoring and adaptive management. Resilience theory complements this statutory framework by recognizing that durable resource protection is achieved through learning, adjustment, and continuous improvement rather than rigid adherence to management decisions made under necessarily imperfect information.

Accordingly, we recommend that the Final TMP explicitly embrace adaptive management as a foundational implementation strategy. **Route designations should not represent the conclusion of the planning process, but rather the beginning of an ongoing stewardship partnership**



among the Bureau, cooperating agencies, local governments, volunteers, recreation organizations, and the public. Monitoring should inform future management decisions, successful mitigation measures should be expanded where appropriate, and management responses should remain proportional to documented conditions rather than predetermined assumptions. Such an approach strengthens both ecological resilience and public confidence while maintaining the flexibility necessary to manage complex landscapes responsibly over time.

Transportation Network Science and Connected Route Systems

One of the most significant shortcomings historically observed in travel management planning has been the tendency to evaluate roads and trails primarily as independent linear features rather than as interconnected components of a functioning transportation system. While route-specific analysis remains an essential element of environmental review, transportation science consistently demonstrates that the value and function of individual corridors cannot be fully understood without considering their contribution to the broader network in which they operate. A transportation network derives much of its utility not from individual segments alone, but from the connectivity, redundancy, circulation, accessibility, and resilience created through the interaction of the system as a whole.

This principle applies equally to public land transportation systems. Roads and trails rarely serve a single destination or user group. Instead, they collectively create opportunities for loop travel, disperse visitor use across the landscape, connect trailheads and recreation sites, provide administrative access, facilitate wildfire suppression and emergency response, support livestock operations, improve access for scientific research, and maintain connectivity among communities and public lands. Consequently, the closure or decommissioning of even relatively short route segments may produce effects extending well beyond the immediate vicinity of the route itself by reducing circulation options, increasing travel distances, concentrating visitor use onto fewer remaining corridors, or eliminating access to otherwise sustainable portions of the transportation network.

Network science further recognizes redundancy as an important characteristic of resilient infrastructure rather than an indication of unnecessary duplication. Transportation systems containing reasonable alternative routes generally perform more effectively during wildfires, flooding, maintenance activities, temporary closures, emergency incidents, or periods of increased visitor demand because traffic and access can be redistributed throughout the network. Conversely, systems reduced to a limited number of primary corridors often become more vulnerable to congestion, resource degradation, safety concerns, and operational disruption because fewer alternatives remain available when individual routes become unavailable. In this



context, maintaining multiple connections within portions of the transportation system frequently enhances both public safety and resource protection by distributing rather than concentrating use.

These principles are especially relevant throughout the Dinosaur North planning area, where recreation occurs across large geographic areas characterized by diverse terrain, dispersed destinations, seasonal variation, and multiple overlapping authorized uses. Many routes function as integral components of larger circulation systems rather than isolated access corridors. Their contribution to visitor experience, public safety, administrative efficiency, and landscape stewardship therefore cannot be accurately evaluated solely by measuring route length, traffic volume, or localized environmental conditions. Instead, the Bureau should evaluate each route according to the role it performs within the larger transportation network and the cumulative consequences that may result if that function is lost.

We appreciate that the Draft EA demonstrates greater recognition of transportation connectivity than many previous travel management efforts. Nevertheless, the Final EA is in distinct need of further analysis of network functionality, particularly where proposed closures may reduce redundancy, interrupt loop opportunities, eliminate administrative flexibility, or concentrate public use onto remaining designated routes. Such analysis should extend beyond simple route inventories and consider how alternative transportation configurations influence visitor distribution, emergency response capability, maintenance efficiency, recreation quality, and long-term sustainability of the transportation system itself.

Transportation planning has long recognized that resilient infrastructure depends upon maintaining systems capable of accommodating change rather than optimizing solely for present conditions. Public land transportation systems should be managed according to the same principle. Durable travel management plans are those that preserve sufficient flexibility, connectivity, and redundancy to adapt as environmental conditions, recreational demand, and management priorities evolve over time. UPLA therefore encourages the Bureau to continue strengthening the systems-based perspective reflected within the Draft EA and to evaluate transportation decisions according to their contribution to overall network functionality as well as localized environmental considerations.

Adaptive Governance and Evidence-Based Decisionmaking

Travel management planning ultimately represents an exercise in public administration as much as natural resource management. While ecological science provides essential information regarding environmental conditions and potential impacts, the process of balancing competing statutory objectives, allocating public resources, evaluating uncertainty, and selecting among



reasonable management alternatives necessarily involves governance decisions. Modern public administration increasingly recognizes that effective governance depends upon transparency, collaboration, accountability, learning, and the continual incorporation of new scientific information into management decisions rather than reliance upon static assumptions or institutional precedent.

Adaptive governance provides a useful framework for achieving these objectives. Unlike traditional command-and-control management approaches that emphasize fixed regulatory outcomes, adaptive governance recognizes that complex environmental systems are characterized by uncertainty, changing conditions, and incomplete information. Effective governance therefore depends upon establishing decision processes capable of incorporating monitoring results, stakeholder participation, interdisciplinary expertise, and evolving scientific understanding into future management decisions. Agencies become more effective not by assuming perfect knowledge at the outset of planning, but by creating systems capable of learning from implementation over time.

This philosophy aligns closely with the procedural objectives of both FLPMA and the National Environmental Policy Act (NEPA). NEPA is fundamentally a decision-making statute. It does not compel particular substantive outcomes but instead requires agencies to gather relevant information, evaluate reasonable alternatives, disclose environmental consequences, consider public input, and articulate rational explanations connecting the evidence contained within the administrative record to the decisions ultimately adopted. Likewise, FLPMA grants the Bureau substantial management discretion while requiring that such discretion be exercised consistently with the principles of multiple use, sustained yield, and prevention of unnecessary or undue degradation. Together, these statutes establish an expectation that public land management decisions be informed, transparent, evidence-based, and responsive to changing circumstances.

Within the context of travel management, evidence-based decisionmaking requires more than identifying environmental resources that occur near existing transportation corridors. It requires demonstrating a rational relationship between observed conditions, anticipated impacts, and the specific management actions proposed to address those impacts. Where route closures are recommended, the administrative record should clearly explain the:

- Nature of the resource concern,
- Evidence supporting the conclusion that continued designated use would produce unacceptable impacts,
- Management alternatives considered,
- Mitigation measures evaluated, and
- Reasons less restrictive approaches were determined to be insufficient.



Such analysis strengthens not only the legal defensibility of agency decisions but also public confidence that travel management outcomes reflect objective evaluation rather than generalized assumptions regarding motorized recreation.

Equally important, adaptive governance recognizes that stakeholders are valuable sources of information rather than obstacles to effective planning. Recreation organizations, county governments, permittees, volunteers, researchers, tribal governments, conservation organizations, and local communities collectively possess decades of field experience regarding route conditions, visitor behavior, maintenance needs, wildlife observations, historical use patterns, and practical management solutions. Incorporating this knowledge alongside scientific analysis improves decision quality while fostering collaborative stewardship partnerships that extend beyond completion of the planning process. Public participation should therefore be understood not merely as a procedural requirement under NEPA, but as an ongoing component of adaptive public land governance.

UPLA believes the Dinosaur North TMP presents an excellent opportunity to demonstrate this modern governance approach. By emphasizing monitoring, adaptive management, collaborative stewardship, route-specific analysis, and transparent evidence-based decisionmaking, the Bureau can develop a Final TMP that remains scientifically credible, legally durable, publicly understandable, and sufficiently flexible to address future challenges while continuing to fulfill Congress's multiple-use mandate. These principles form the analytical foundation upon which the more detailed resource-specific comments contained throughout the remainder of this letter are based.

Recreation Ecology and Sustainable Public Access

One of the most significant developments in natural resource management over the past several decades has been the emergence of recreation ecology as a mature scientific discipline dedicated to understanding the interactions between outdoor recreation and ecological systems. Early land management philosophies often assumed that increasing levels of recreation necessarily produced proportional increases in environmental degradation, leading to management approaches that frequently emphasized restricting public access wherever sensitive resources occurred. Contemporary recreation ecology presents a substantially more nuanced understanding. While unmanaged or poorly managed recreation can unquestionably affect environmental resources, the magnitude, distribution, and persistence of those effects are influenced far more by **how recreation is managed** than by the simple presence or absence of recreation itself (Marion & Leung, 2011; Monz et al., 2013).



This distinction is particularly important within travel management planning because designated transportation systems represent one of the primary mechanisms through which recreation impacts can be effectively directed, monitored, and managed. Research consistently demonstrates that recreation impacts are rarely distributed uniformly across landscapes. Rather, they become concentrated where visitor use lacks clear direction, where infrastructure is inadequate, where maintenance is deferred, or where visitors are uncertain regarding appropriate travel behavior. Conversely, clearly designated and properly maintained transportation systems substantially improve visitor compliance, reduce unauthorized route proliferation, encourage predictable travel patterns, and provide agencies with practical opportunities to implement targeted mitigation measures where localized impacts occur.

Accordingly, sustainable recreation should not be viewed as the absence of human use but as the deliberate management of human use within ecological balance. This management philosophy recognizes that conservation objectives are frequently achieved not by eliminating recreation, but by directing recreation toward locations where environmental impacts are understood, monitored, and effectively managed. Designated roads and trails therefore function as durable recreation infrastructure designed to accommodate public access while protecting surrounding ecological resources from unnecessary disturbance. Transportation systems serve the same conservation function as designated campsites, maintained hiking trails, boardwalks through wetlands, climbing anchors on sensitive rock faces, or interpretive overlooks that concentrate visitor use in locations specifically intended to sustain repeated public visitation.

The Dinosaur North planning area illustrates this principle particularly well. Existing designated routes provide access to an extraordinary diversity of recreational opportunities, including hunting, wildlife observation, dispersed camping, photography, geologic interpretation, paleontological resources, backcountry exploration, off-highway vehicle recreation, mountain biking, equestrian use, and access to scenic viewpoints that contribute substantially to the public's understanding and appreciation of northeastern Utah's unique landscapes. These experiences foster personal investment in public land stewardship and create lasting connections between citizens and the lands held in trust for their benefit. The public's willingness to support conservation funding, volunteer stewardship, restoration efforts, and responsible recreation is strengthened when people are able to responsibly experience these landscapes firsthand.

Equally important, recreation itself frequently serves as an important source of environmental stewardship. Organized off-highway vehicle organizations, sportsmen's groups, equestrian associations, mountain biking organizations, conservation volunteers, and numerous local recreation clubs collectively contribute thousands of volunteer hours each year toward trail maintenance, erosion control, habitat restoration, invasive species management, fence repair,



route signing, litter removal, visitor education, archaeological site protection, and monitoring efforts conducted in partnership with federal land management agencies. These partnerships demonstrate that recreation communities should not be viewed merely as users of public lands, but as valuable conservation partners capable of expanding the Bureau's stewardship capacity well beyond what agency resources alone can provide.

For these reasons, we urge the Bureau to continue applying the principles of recreation ecology throughout the Final EA by emphasizing sustainable management rather than unnecessary restriction. Where resource concerns are identified, management responses should focus first upon improving route sustainability, directing visitor behavior, implementing targeted mitigation, strengthening monitoring, and engaging stewardship partners before considering permanent reductions in transportation infrastructure. Such an approach is fully consistent with contemporary recreation science while advancing both conservation and responsible public access.

Social Carrying Capacity, Public Benefit, and Community Sustainability

Public land planning necessarily involves more than evaluating ecological conditions alone. The Bureau is also responsible for managing lands that support communities, regional economies, cultural traditions, recreational opportunities, and the broader public interest. Modern recreation planning therefore recognizes the concept of social carrying capacity, which acknowledges that the quality and sustainability of recreation experiences depend not only upon environmental conditions, but also upon the availability, diversity, accessibility, and distribution of recreation opportunities across the landscape. A transportation system that is environmentally sustainable but functionally incapable of accommodating reasonable public access does not fully satisfy the multiple-use objectives established by Congress.

Travel management decisions therefore produce consequences extending well beyond individual route segments. Changes to transportation networks influence visitor experiences, public safety, hunting access, dispersed camping opportunities, tourism, local businesses, gateway communities, outfitting operations, volunteer stewardship programs, and the overall accessibility of public lands for families, elderly visitors, individuals with disabilities, and others who rely upon motorized access to experience landscapes they are otherwise physically unable to reach. These broader public benefits deserve meaningful consideration alongside biological and physical resource analyses because they represent integral components of the multiple-use framework established under FLPMA.



The Dinosaur North planning area contributes significantly to the recreational identity and economic vitality of northeastern Utah. Visitors drawn by the area's unique geological features, paleontological significance, wildlife resources, scenic landscapes, and extensive backcountry opportunities support local communities through expenditures on lodging, food, fuel, equipment, guiding services, vehicle maintenance, permits, and numerous other goods and services. Recreation-related economic activity helps sustain businesses, employment opportunities, tax revenues, and community investment that, in turn, strengthen long-term public support for conserving these landscapes. Recreation and conservation are mutually reinforcing public benefits rather than competing policy objectives.

UPLA encourages the Bureau to continue evaluating transportation decisions according to their broader contribution to community sustainability, equitable public access, and the enduring relationship between Americans and their public lands. Maintaining a resilient transportation network preserves not only recreational opportunities, but also the social, cultural, educational, and economic benefits that flow from responsible public access to federally managed landscapes.

Systems-Based Planning and Transition to FLPMA

Collectively, the principles discussed throughout this comment letter support a single overarching conclusion: effective travel management depends upon viewing public lands as integrated social-ecological systems rather than as collections of independent resource categories evaluated in isolation. Ecological resilience, transportation network functionality, recreation ecology, adaptive governance, community sustainability, and public stewardship are not separate planning objectives competing for priority. They are interconnected components of a comprehensive multiple-use landscape whose long-term sustainability depends upon balanced, evidence-based management.

This systems perspective is particularly important because decisions affecting one component of the transportation network inevitably influence many others. Route designations affect wildlife management, recreation opportunities, watershed protection, emergency response capability, local economies, administrative efficiency, volunteer stewardship, visitor behavior, and public perceptions of federal land management simultaneously. Accordingly, transportation planning should seek integrated solutions that maximize complementary benefits across these interconnected systems rather than optimizing individual resource objectives independently.

The legal framework established by Congress reflects precisely this integrated management philosophy. FLPMA does not direct the Bureau to maximize recreation, conservation, energy development, grazing, or any other single authorized use. Instead, it requires the Bureau to



exercise informed professional judgment in balancing these diverse public interests while preventing unnecessary or undue degradation of public lands. The following section discusses this statutory framework in detail and explains why FLPMA's multiple-use mandate provides the governing legal foundation for evaluating the alternatives considered in the Dinosaur North Travel Management Plan, including UPLA's support for a thoughtfully refined and evidence-based Modified Alternative D.

CONGRESSIONAL DIRECTION UNDER FLPMA AND THE MULTIPLE-USE MANDATE

FLPMA Represents Congress's Comprehensive Public Land Policy

The Federal Land Policy and Management Act of 1976 (FLPMA) represents one of the most consequential public land statutes ever enacted by Congress because it fundamentally redefined the federal government's relationship with the public lands. Prior to FLPMA, much of federal land policy remained rooted in nineteenth-century disposal statutes enacted during westward expansion, under which the prevailing assumption was that federally owned lands would eventually be transferred into private ownership to encourage settlement, agriculture, mining, transportation infrastructure, and economic development. While millions of acres were conveyed under the Homestead Act, Mining Law of 1872, Desert Land Act, Stock-Raising Homestead Act, and numerous other disposal authorities, Congress increasingly recognized throughout the twentieth century that substantial portions of the remaining federal estate possessed enduring ecological, recreational, scientific, cultural, watershed, and economic values that warranted permanent public ownership.

FLPMA marked the culmination of this evolution in national public land policy. Through its congressional findings and declaration of policy, Congress expressly stated that "the public lands be retained in Federal ownership, unless...it is determined that disposal of a particular parcel will serve the national interest" (43 U.S.C. § 1701(a)(1)). This declaration represented a profound shift in federal land management philosophy. Rather than viewing the public lands as an inventory awaiting eventual disposal, Congress established retention, stewardship, and balanced management as the enduring foundation of federally-managed public land policy.

Equally significant, Congress rejected the notion that permanently retaining the public lands meant managing them for any single dominant purpose. Instead, FLPMA established a comprehensive management framework recognizing that federally managed landscapes simultaneously provide ecological, recreational, cultural, scenic, scientific, economic, and social benefits that collectively serve the national interest. Congress expressly found that these lands



should be managed in a manner that protects "the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values" while simultaneously preserving lands "in their natural condition," providing "food and habitat for fish and wildlife and domestic animals," and furnishing "outdoor recreation and human occupancy and use" (43 U.S.C. § 1701(a)(8)). Importantly, Congress did not identify these values as mutually exclusive priorities competing for dominance. Rather, they were intentionally presented as complementary public purposes that federal land managers are expected to consider collectively through integrated resource management.

This integrated approach remains one of FLPMA's defining characteristics. Congress understood that public lands support diverse communities, industries, recreational traditions, ecological processes, and cultural landscapes that cannot be effectively managed through narrow, single-purpose decision-making. Public land stewardship therefore requires balancing numerous public interests that frequently overlap, occasionally conflict, and continuously evolve over time. This balancing obligation distinguishes FLPMA from statutes enacted for singular resource objectives and instead establishes a flexible management framework capable of accommodating changing scientific understanding, environmental conditions, public needs, and management priorities while maintaining fidelity to Congress's overarching direction.

The legislative structure of FLPMA likewise demonstrates Congress's intent that public land management remain adaptive rather than prescriptive. Instead of mandating predetermined management outcomes, FLPMA delegates substantial professional discretion to the Secretary of the Interior and the Bureau of Land Management to implement multiple-use management through land use planning, interdisciplinary analysis, public participation, monitoring, and informed administrative judgment. However, that discretion is neither unlimited nor unbounded. Congress carefully constrained agency authority by requiring that management decisions remain consistent with the principles of multiple use, sustained yield, prevention of unnecessary or undue degradation, public participation, and comprehensive land use planning. In other words, FLPMA grants the Bureau broad flexibility regarding *how* it manages public lands, but much narrower discretion regarding *what* Congress intended those lands to provide.

This distinction is particularly important in the context of travel management planning. Transportation decisions should not be viewed as isolated administrative determinations concerning individual roads or trails. Rather, they represent implementation decisions directly affecting Congress's comprehensive vision for how public lands are to be managed. Every designation, closure, seasonal restriction, or management prescription influences the practical ability of the Bureau to simultaneously achieve conservation, recreation, scientific research, cultural resource stewardship, grazing administration, wildfire response, law enforcement, public



safety, and numerous other congressionally authorized public land uses. Consequently, travel management planning should be understood not as a transportation exercise alone, but as one of the Bureau's principal mechanisms for implementing FLPMA's comprehensive management philosophy.

UPLA subsequently asserts the exigence that the Final EA should consistently evaluate alternatives through this broader statutory framework. The central question is not whether individual routes intersect sensitive resources, nor whether isolated environmental impacts may occur adjacent to designated transportation corridors. Rather, the appropriate inquiry is whether the transportation system, viewed as an integrated component of the larger public land management framework established by Congress, effectively advances the diverse and balanced public purposes that FLPMA directs the Bureau to achieve. Management decisions that unnecessarily diminish one congressionally recognized public value without demonstrably advancing the broader multiple-use mission risk departing from both the spirit and structure of FLPMA itself.

The planning principles discussed throughout the preceding General Comments... including resilience, adaptive management, transportation network science, recreation ecology, evidence-based decision-making, and systems-based planning... are not merely independent policy preferences advanced by UPLA. Rather, they represent contemporary professional approaches for implementing the comprehensive stewardship philosophy Congress embedded within FLPMA nearly five decades ago. Modern public land management has increasingly evolved toward these integrated approaches precisely because they provide agencies with more effective means of balancing the diverse and sometimes competing public values Congress instructed them to manage.

Multiple Use Means Balancing Public Values, Not Maximizing Individual Resources

The principle of multiple use constitutes the cornerstone of FLPMA and serves as the governing standard by which virtually all BLM planning decisions should be evaluated. Yet despite its central importance, multiple use is frequently misunderstood as merely permitting numerous activities to occur on the same landscape. Congress envisioned a far more deliberate and sophisticated management framework. The statutory definition of multiple use does not simply authorize diverse land uses; it establishes a decision-making philosophy requiring federal land managers to exercise informed professional judgment in balancing competing public interests to achieve the greatest long-term benefit for the American people.



FLPMA defines multiple use as "the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people" (43 U.S.C. § 1702(c)). Congress further explained that multiple use involves "a combination of balanced and diverse resource uses" while taking into account "the long-term needs of future generations," "the relative values of the resources," and "the availability of alternative means" of meeting those needs. Perhaps most significantly, Congress instructed that management decisions be made "without permanent impairment of the productivity of the land and the quality of the environment," thereby emphasizing sustainability rather than maximization of any individual resource objective.

Several aspects of this statutory language warrant careful attention. First, Congress deliberately chose the words **combination**, **balanced**, and **diverse** to describe the desired outcome of public land management. These terms reflect an intentional rejection of single-purpose management philosophies under which one resource objective consistently overrides all others. Had Congress intended the Bureau to maximize wildlife habitat whenever wildlife resources are present, maximize recreation wherever recreational demand exists, maximize grazing where forage is available, or maximize energy production where mineral resources occur, it could have said so expressly. Instead, Congress adopted language requiring integration, balance, and professional judgment precisely because public lands simultaneously support numerous legitimate public values that cannot be optimized independently.

Second, Congress directed the Bureau to consider both present and future public needs. This temporal perspective reinforces that multiple use is fundamentally concerned with long-term stewardship rather than short-term optimization. **Decisions should neither sacrifice future ecological integrity for immediate public use nor unnecessarily foreclose present public opportunities based upon speculative or unsupported assumptions regarding future resource conditions.** Instead, federal land managers must evaluate how current management actions influence the long-term sustainability of all congressionally recognized public land values. Adaptive management, monitoring, mitigation, restoration, engineering improvements, and collaborative stewardship all provide mechanisms for achieving this long-term balance while avoiding unnecessarily rigid management outcomes.

Third, FLPMA expressly requires the Bureau to consider "the relative values of the resources" rather than "the combination of uses that will give the greatest economic return or the greatest unit output" (43 U.S.C. § 1702(c)). This language is particularly instructive because it demonstrates that Congress understood public lands generate numerous forms of value that cannot be measured solely through biological metrics, visitor counts, commodity production, or economic output. Recreation, scenic quality, wildlife habitat, cultural resources, scientific



research, watershed protection, public safety, community well-being, and opportunities for future generations each represent legitimate public values deserving meaningful consideration within the planning process. None exists in isolation, and none was intended by Congress to categorically supersede the others.

This understanding has important implications for travel management planning. Transportation systems function as shared infrastructure supporting virtually every multiple-use objective recognized under FLPMA. The same designated routes used by off-highway vehicle recreationists frequently provide access for hunters, anglers, livestock permittees, wildlife biologists, cultural resource specialists, search and rescue personnel, wildfire suppression crews, law enforcement officers, invasive species management teams, watershed restoration projects, utility operators, researchers, and Bureau administrative staff. Consequently, evaluating transportation decisions solely according to localized environmental conditions without fully considering their broader contribution to the integrated multiple-use framework risks undervaluing the extensive public benefits those transportation systems provide.

UPLA therefore encourages the Bureau to interpret multiple use as Congress intended: not as a mathematical balancing test in which every acre or every mile must equally satisfy every resource objective, but as a comprehensive stewardship philosophy requiring thoughtful integration of diverse public interests through informed, evidence-based, and adaptive management. Under this framework, conservation and recreation are not inherently competing values. Rather, they are complementary public benefits that, when managed through sustainable transportation systems, collaborative stewardship, targeted mitigation, and adaptive management, reinforce one another while collectively advancing the long-term public interest.

The analyses that follow apply this understanding of multiple use to the specific alternatives, route designations, and resource issues evaluated within the Draft EA. Throughout this comment letter, UPLA asserts that a thoughtfully refined **Modified Alternative D** most faithfully implements Congress's direction because it better balances the diverse public values recognized under FLPMA while maintaining the flexibility necessary to protect sensitive resources through adaptive, evidence-based management rather than unnecessary reductions in the sustainable transportation network.

Recreation Is One of Congress's Principal Uses of Public Lands

One of the most persistent misconceptions within public land management is the characterization of outdoor recreation as a discretionary or secondary land use that may be accommodated only after environmental, administrative, or other management objectives have been satisfied. This



perspective is inconsistent with both the language and legislative structure of FLPMA. Congress did not identify recreation as an incidental benefit arising from public ownership of federal lands. Rather, Congress expressly recognized outdoor recreation as one of the principal public purposes for which public lands are retained and managed, placing it alongside grazing, timber production, mineral development, watershed protection, fish and wildlife habitat, scientific values, natural scenic qualities, and cultural resources within the comprehensive multiple-use framework established by statute.

The prominence Congress afforded recreation within FLPMA reflects a broader recognition that public lands provide value not merely because they contain important natural resources, but because they remain accessible to the American people for education, exploration, inspiration, recreation, and the development of a lasting stewardship ethic. Opportunities to responsibly experience public lands create tangible public benefits that extend well beyond recreation itself. Hunting, fishing, dispersed camping, off-highway vehicle travel, hiking, mountain biking, horseback riding, wildlife observation, photography, paleontological interpretation, and scenic driving all foster public appreciation for the nation's natural heritage while strengthening public understanding of conservation, natural resource management, and the importance of responsible stewardship. These experiences cultivate the broad public support necessary to sustain long-term investment in conservation, restoration, scientific research, and public land management.

Congress understood that public ownership alone does not guarantee these benefits. Public lands must remain reasonably accessible if the public is to meaningfully experience, appreciate, and participate in their stewardship. Recreation therefore occupies a unique position within the multiple-use framework because it simultaneously represents an authorized land use, a mechanism for public education, a driver of local and regional economies, and an important source of civic investment in the long-term conservation of public lands. In this respect, **recreation functions not merely as an outcome of effective land management but as one of the means through which effective land management is sustained.**

The BLM has long recognized this relationship. Across millions of acres of public lands throughout the West, recreation increasingly represents one of the most significant public uses managed by the agency. Growing participation in outdoor recreation has expanded opportunities for volunteer stewardship, trail maintenance partnerships, habitat restoration projects, visitor education programs, archaeological site protection, invasive species management, and collaborative conservation initiatives involving local governments, nonprofit organizations, user groups, educational institutions, and private citizens. Recreation organizations... including organizations representing motorized recreation... have become indispensable partners in



maintaining sustainable transportation systems and extending the Bureau's limited operational capacity through thousands of volunteer hours contributed annually toward stewardship of the public lands.

This collaborative relationship illustrates why recreation should not be viewed solely through the lens of resource consumption. Recreation also generates substantial conservation capacity. Visitors who regularly experience public lands often become their most active advocates, contributing financial resources, volunteer labor, technical expertise, political support, and long-term institutional knowledge that directly benefit public land management. Organizations such as UPLA and its member clubs routinely participate in route maintenance, erosion control, habitat restoration, invasive species removal, sign installation, public education, archaeological stewardship, and monitoring efforts conducted in cooperation with federal and state land management agencies. These activities represent tangible conservation outcomes made possible precisely because public access allows citizens to develop enduring personal relationships with the landscapes they help steward.

The economic significance of recreation further reinforces Congress's decision to include it among the principal uses of public lands. Outdoor recreation contributes billions of dollars annually to the national economy while supporting thousands of rural communities throughout the West whose economies increasingly depend upon recreation-related tourism, hospitality, outfitting services, equipment sales, vehicle maintenance, fuel purchases, lodging, restaurants, and guide services. Communities surrounding the Dinosaur North planning area derive meaningful economic benefits from visitors who travel to northeastern Utah to experience its unique geologic landscapes, dinosaur resources, hunting opportunities, dispersed camping, scenic backcountry roads, and diverse motorized and non-motorized recreation opportunities. These economic benefits are not separate from conservation; rather, they create durable local incentives to maintain healthy public lands capable of supporting sustainable recreation well into the future.

The social importance of recreation likewise deserves meaningful consideration. Access to public lands provides opportunities for families to recreate together, introduces younger generations to responsible outdoor ethics, improves physical and mental health, strengthens community identity, and expands opportunities for individuals who might otherwise have limited access to nature. For many elderly visitors, veterans, families with young children, and individuals with mobility limitations or disabilities, motorized transportation provides the only practical means of experiencing many of the remarkable landscapes managed by the Bureau. Maintaining a functional transportation network therefore advances not only recreation policy



but also broader principles of equitable public access and inclusive enjoyment of federally managed public lands.

For these reasons, UPLA urges the Bureau to continue evaluating recreation as Congress intended: not as a competing interest weighed against conservation, but as one of the principal public values that multiple-use management is expressly designed to sustain. Travel management planning should therefore seek to maximize opportunities for responsible recreation that are compatible with long-term resource stewardship while avoiding unnecessary reductions in public access where less restrictive management approaches can effectively protect identified resources. Such an approach most faithfully reflects both the language and the underlying philosophy of FLPMA while strengthening the long-term relationship between the American people and the public lands entrusted to the Bureau's stewardship.

Transportation Infrastructure Is Necessary to Implement Multiple Use

If recreation represents one of the principal purposes for which Congress directed the Bureau to manage public lands, transportation infrastructure represents one of the principal mechanisms through which that congressional directive is implemented. Roads and trails are often discussed primarily within travel management planning as potential sources of environmental impact. While transportation corridors undoubtedly require careful planning, maintenance, and mitigation to ensure long-term sustainability, they are far more accurately understood as foundational public infrastructure that enables the Bureau to fulfill virtually every component of its statutory multiple-use mission.

Without a functional transportation system, the Bureau's ability to implement FLPMA would be fundamentally constrained. Recreation opportunities would become inaccessible to much of the public. Wildlife biologists would encounter greater difficulty conducting population monitoring, habitat improvement projects, and species management activities. Archaeologists and cultural resource specialists would face reduced access for inventory, documentation, monitoring, and preservation efforts. Firefighters and emergency responders would experience diminished access during wildfire suppression, search and rescue operations, medical emergencies, and hazardous materials incidents. Livestock permittees would encounter increased challenges managing grazing allotments, maintaining range improvements, and responding to emergencies involving livestock or water infrastructure. Restoration projects addressing invasive species, erosion control, watershed rehabilitation, abandoned mine reclamation, and vegetation management would likewise become substantially more difficult to implement efficiently across large and often remote landscapes.



Transportation infrastructure therefore serves the Bureau's entire land management mission rather than any single user group. Designated routes function simultaneously as recreation facilities, administrative access corridors, emergency response infrastructure, resource management tools, scientific research access, law enforcement support, and maintenance corridors. A single designated road may support hunters during one season, wildfire suppression crews during another, archaeologists conducting cultural inventories, range specialists inspecting grazing improvements, biologists monitoring sensitive wildlife populations, volunteers maintaining fences or restoring habitat, and families exploring public lands on weekends. The infrastructure itself remains constant while supporting a remarkably diverse array of congressionally authorized public uses.

This multifunctional role underscores why transportation systems should be evaluated as integrated public infrastructure rather than isolated disturbances upon the landscape. Contemporary infrastructure planning recognizes that transportation networks derive much of their public value through connectivity, redundancy, reliability, and operational flexibility. The same principles apply to public land transportation systems. Well-connected networks improve emergency response times, distribute visitor use more evenly across the landscape, reduce congestion, enhance visitor safety, provide alternative access during seasonal closures or wildfire events, improve maintenance efficiency, and increase the Bureau's ability to adapt to changing environmental conditions. Conversely, reducing network connectivity may create unintended consequences extending well beyond the immediate vicinity of individual route closures, including increased travel distances, concentrated visitor use, diminished emergency access, reduced administrative efficiency, and greater pressure upon remaining transportation corridors.

Transportation infrastructure also serves an important conservation function. Clearly designated roads and trails channel recreation onto predictable corridors where impacts can be monitored, managed, and mitigated through engineering improvements, maintenance, education, and enforcement. This concentration of use reduces the likelihood of unauthorized route creation, simplifies visitor compliance, improves restoration of disturbed areas, and enables limited agency resources to be directed toward known management priorities. In this respect, **transportation infrastructure constitutes one of the Bureau's most effective conservation tools because it allows public access to occur in a manner that minimizes unnecessary disturbance across the broader landscape.**

Importantly, the presence of transportation infrastructure should not be interpreted as evidence that resource protection has failed. In many instances, transportation infrastructure represents the very mechanism through which resource protection succeeds. Properly located, engineered, signed, monitored, and maintained routes allow agencies to accommodate legitimate public use



while safeguarding surrounding ecological, cultural, and scenic resources from more dispersed patterns of disturbance. Eliminating designated infrastructure without carefully considering the resulting redistribution of visitor use may inadvertently reduce rather than improve long-term conservation outcomes.

These considerations are particularly relevant throughout the Dinosaur North planning area, where the transportation network supports an exceptionally diverse range of recreational experiences, scientific opportunities, administrative responsibilities, and resource management activities across a large and geographically complex landscape. Individual roads and trails frequently perform functions extending far beyond simple destination access, contributing to network connectivity, emergency preparedness, maintenance efficiency, public safety, and overall landscape resilience. Evaluating these routes solely according to localized environmental characteristics risks overlooking the substantial system-wide benefits they provide.

For these reasons, UPLA emphasizes the fact that transportation infrastructure must be evaluated as essential multiple-use infrastructure whose continued functionality directly influences the Bureau's ability to implement the comprehensive public land management framework established by FLPMA. Decisions regarding route designation should therefore consider not only localized resource conditions but also the indispensable role transportation systems play in sustaining recreation, conservation, scientific research, emergency response, administrative management, and the full spectrum of public values Congress directed the Bureau to balance. Properly managed transportation networks are not contrary to the multiple-use mandate; they are one of its most indispensable instruments.

Preventing Unnecessary or Undue Degradation Does Not Require Maximizing Restrictions

One of FLPMA's most important substantive directives requires the Secretary of the Interior, through the Bureau of Land Management, to "take any action necessary to prevent unnecessary or undue degradation of the lands" (43 U.S.C. § 1732(b)). This provision serves as one of the Bureau's principal stewardship obligations and appropriately recognizes that public lands must be managed in a manner that maintains their long-term ecological productivity and public value. However, the statutory language warrants careful interpretation. **Congress did not direct the Bureau to eliminate all environmental disturbance, maximize ecological protection irrespective of competing statutory objectives, or prohibit otherwise lawful public uses wherever environmental effects may occur.** Instead, Congress deliberately chose the narrower and more balanced standard of preventing unnecessary or undue degradation.



The distinction is significant. Every authorized use of public lands produces some degree of environmental change. Recreation, livestock grazing, wildfire suppression, scientific research, habitat restoration, vegetation treatments, mineral development, utility maintenance, cultural resource preservation, road maintenance, and even ecological restoration projects inevitably alter the landscape in some fashion. Congress fully understood this reality when it enacted FLPMA. Had Congress intended that any measurable environmental disturbance justify restricting otherwise authorized public uses, the multiple-use framework established throughout the statute would be rendered largely meaningless. Public lands cannot simultaneously support recreation, grazing, energy development, wildlife management, watershed restoration, scientific research, and numerous other authorized uses if management is premised upon eliminating all environmental effects associated with those activities.

Instead, FLPMA requires the Bureau to exercise professional judgment in distinguishing between environmental effects that are inherent to responsible multiple-use management and those that become unnecessary or undue because they exceed what is reasonably required to accomplish authorized public purposes. This distinction reflects the practical reality that sustainable public land management is not synonymous with impact avoidance. Rather, it involves identifying acceptable levels of environmental change, implementing reasonable mitigation measures, monitoring management effectiveness, and adapting management practices over time to ensure that resource conditions remain compatible with Congress's broader multiple-use objectives.

This understanding is consistent with contemporary principles of resource management, which increasingly recognize that conservation outcomes are often achieved through active stewardship rather than passive exclusion. Engineering improvements, drainage stabilization, route hardening, seasonal restrictions, visitor education, restoration projects, maintenance, law enforcement, volunteer stewardship, habitat enhancement, and adaptive management all represent practical tools through which the Bureau can prevent unnecessary or undue degradation while continuing to accommodate lawful public access. These approaches acknowledge that sustainable use and resource protection frequently reinforce one another when supported by sound planning and ongoing management.

Accordingly, the existence of a resource concern should not automatically be viewed as requiring route closure or elimination of public access. Rather, the planning process should evaluate whether the identified concern can be effectively addressed through management actions that preserve both resource values and the transportation system upon which multiple-use management depends. Permanent closure represents one potential management response among many, but it should generally be considered only after reasonable mitigation measures have been



evaluated and where the administrative record demonstrates that less restrictive approaches cannot adequately prevent unnecessary or undue degradation.

This principle is especially important because transportation systems themselves often contribute directly to preventing degradation. Properly designated and maintained routes concentrate travel onto predictable corridors, discourage unauthorized route proliferation, facilitate visitor education, improve enforcement efficiency, support monitoring, and provide practical access for restoration and maintenance activities. Eliminating sustainable transportation infrastructure without considering these broader system functions may inadvertently redistribute recreation across the landscape, increase unauthorized travel, reduce administrative access, and ultimately produce resource outcomes inconsistent with the very conservation objectives the closures were intended to achieve.

The statutory phrase "unnecessary or undue degradation" likewise requires that management actions remain proportional to the conditions they seek to address. FLPMA does not authorize restrictions based solely upon the theoretical possibility of environmental impacts or generalized assumptions regarding particular forms of recreation. Rather, the Bureau's management decisions should reflect documented resource conditions, site-specific analysis, interdisciplinary expertise, and a rational assessment of whether proposed management actions are reasonably tailored to the nature and magnitude of the identified concern. A management response that substantially diminishes congressionally authorized public access while producing only speculative, marginal, or unsupported conservation benefits risks becoming disproportionate to the problem it purports to solve.

UPLA therefore emphasizes the legal and administrative requirement for the Bureau to interpret its obligation under 43 U.S.C. § 1732(b) as Congress intended: as a mandate to prevent avoidable degradation through thoughtful, evidence-based stewardship rather than through an institutional preference for increasingly restrictive management. Such an interpretation best harmonizes FLPMA's conservation directive with the statute's equally important commitments to multiple use, sustained yield, public participation, and long-term stewardship of the public lands for the benefit of present and future generations. Throughout this comment letter, UPLA advocates management approaches that satisfy both components of this congressional directive by protecting sensitive resources through adaptive management, targeted mitigation, and sustainable transportation planning while preserving the diverse public uses Congress expressly directed the Bureau to accommodate.

Agency Discretion Must Remain Within Congressional Direction



FLPMA appropriately grants the BLM substantial discretion in managing public lands because Congress recognized that effective stewardship requires agencies to apply professional expertise to highly diverse landscapes, evolving scientific information, changing public needs, and site-specific management challenges. Decisions regarding transportation planning, habitat conservation, recreation management, wildfire response, restoration priorities, and land use planning necessarily involve technical judgments that cannot be prescribed exhaustively through statute. Congress therefore entrusted the Bureau with broad administrative authority to implement multiple-use management through interdisciplinary planning, public participation, and informed professional judgment.

However, broad discretion is not synonymous with unlimited discretion. Administrative agencies possess only those authorities delegated by Congress, and those delegated authorities must always be exercised consistently with the statutory purposes, limitations, and policy objectives established by the enabling legislation. FLPMA defines not only the Bureau's authority to manage public lands, but also the principles that govern how that authority is to be exercised. Consequently, agency discretion exists within the framework established by Congress rather than independent of it.

This distinction is fundamental to travel management planning. While the Bureau possesses considerable flexibility in determining how best to designate transportation systems, evaluate environmental impacts, implement mitigation measures, and select among reasonable management alternatives, those decisions must remain consistent with FLPMA's multiple-use mandate, sustained-yield principles, comprehensive planning requirements, prevention of unnecessary or undue degradation, and the broader congressional objective of managing the public lands for the greatest long-term benefit of the American people. Discretion may guide implementation, but it cannot alter Congress's underlying policy choices.

Likewise, NEPA establishes procedural safeguards that ensure this discretion is exercised through reasoned decision-making rather than administrative preference. Agencies must identify the purpose and need for action, consider a reasonable range of alternatives, evaluate environmental consequences using the best available information, disclose uncertainties, respond meaningfully to substantive public comments, and articulate a rational connection between the evidence contained within the administrative record and the management decisions ultimately adopted. These procedural requirements are not mere formalities. They provide the mechanism through which agency discretion remains transparent, accountable, and grounded in objective analysis.



For travel management decisions, this means that route designations should not be based upon generalized assumptions regarding categories of recreation or broad assertions that transportation corridors intersect environmentally sensitive landscapes. The Bureau's conclusions must instead be supported by route-specific analysis demonstrating the nature of the resource concern, the evidence supporting the determination that continued designated use would produce unacceptable impacts, the management objectives being advanced, the alternatives considered, the mitigation measures evaluated, and the reasons less restrictive approaches were determined to be insufficient. **Such analysis enables both the public and reviewing courts to understand the reasoning underlying agency decisions while ensuring that management actions remain proportionate to documented conditions.**

This principle reflects one of the foundational tenets of administrative law: agencies must demonstrate a rational relationship between the facts found and the decisions made. The existence of agency expertise does not relieve the Bureau of its responsibility to explain why particular management choices reasonably advance the statutory objectives Congress established. Indeed, meaningful explanation becomes increasingly important where planning decisions substantially affect congressionally authorized public uses such as recreation, public access, or transportation infrastructure. Transparency strengthens administrative legitimacy by allowing interested parties to evaluate not merely what decisions were reached, but why those decisions represent reasonable implementations of congressional direction.

After reviewing the Draft EA, we believe this document reflects a sincere effort by the Bureau to evaluate complex and often competing resource considerations throughout the Dinosaur North planning area. Nevertheless, **where alternatives propose eliminating transportation infrastructure or substantially reducing public access, the Final EA must substantively strengthen its route-specific explanations, documenting the evidentiary basis supporting management decisions, and clearly demonstrating how selected alternatives most effectively balance the diverse public values FLPMA requires the Bureau to consider.** Doing so will not only improve the legal defensibility of the Final TMP but also reinforce public confidence that transportation decisions are grounded in objective evidence rather than generalized management preferences.

Ultimately, the Bureau's discretion is one of its greatest institutional strengths because it allows professional land managers to adapt to changing environmental conditions, emerging scientific knowledge, and evolving public needs. At the same time, that discretion carries a corresponding responsibility to ensure that management decisions remain firmly anchored to Congress's statutory direction. UPLA emphasizes that a thoughtfully refined Modified Alternative D, centered on adaptive management, targeted mitigation, sustainable transportation infrastructure,



and route-specific decision-making, best fulfills both the flexibility Congress afforded the Bureau and the enduring multiple-use mission Congress directed the Bureau to implement.

Modern Multiple-Use Stewardship

Nearly five decades have passed since Congress enacted FLPMA, and during that time the science, technology, and professional practice of public land management have evolved considerably. Advances in landscape ecology, conservation biology, recreation ecology, hydrology, wildfire science, geographic information systems, transportation engineering, climate science, adaptive management, and collaborative governance have substantially expanded the Bureau's ability to understand complex natural systems and implement increasingly sophisticated management strategies. Yet despite these advances in professional practice, the underlying statutory direction established by Congress has remained remarkably consistent. Public lands continue to be managed for multiple use and sustained yield, public participation remains central to federal decision-making, and the Bureau continues to bear the responsibility of balancing diverse public interests while preventing unnecessary or undue degradation.

Modern stewardship should therefore be understood not as a departure from FLPMA, but as the continued refinement of how Congress's multiple-use mandate is implemented in light of improved scientific understanding and decades of practical management experience. The statutory principles embedded within FLPMA have proven sufficiently durable to accommodate new technologies, changing environmental conditions, evolving recreational demands, and increasingly complex conservation challenges precisely because Congress established a flexible management framework rather than prescribing rigid management outcomes. Today's planning tools provide land managers with more effective methods of achieving the same balanced stewardship objectives Congress articulated in 1976.

Among the most significant developments has been the widespread adoption of adaptive management as a guiding principle for natural resource planning. Rather than relying upon static assumptions regarding future resource conditions, adaptive management recognizes that ecosystems and human use patterns continually evolve. Monitoring, scientific research, maintenance, engineering improvements, restoration, seasonal management, and collaborative stewardship allow agencies to respond to changing conditions while maintaining long-term flexibility. This iterative approach reduces the need for permanent management decisions based upon uncertainty and instead encourages continual learning and refinement as additional information becomes available.



Likewise, modern transportation planning increasingly recognizes that roads and trails function as integrated infrastructure systems rather than isolated linear disturbances. Transportation network science demonstrates that connectivity, redundancy, circulation, and resilience contribute substantially to both visitor safety and resource protection. Recreation ecology similarly demonstrates that designated transportation systems frequently reduce overall environmental disturbance by concentrating use onto managed corridors where impacts can be monitored, mitigated, and addressed through targeted stewardship. Landscape ecology has further demonstrated that conservation outcomes often depend upon managing entire systems rather than individual resource features in isolation. Collectively, these disciplines support management approaches that emphasize sustainable transportation infrastructure as a tool for achieving conservation rather than viewing transportation infrastructure as inherently incompatible with resource protection.

Equally important, modern stewardship increasingly recognizes that successful public land management depends upon partnerships extending well beyond the Bureau itself. Local governments, Tribal governments, state agencies, universities, conservation organizations, recreation groups, grazing permittees, sportsmen, volunteers, scientific researchers, gateway communities, and numerous other stakeholders collectively possess decades of institutional knowledge regarding local landscapes and contribute substantial resources toward stewardship of public lands. These collaborative relationships significantly expand the Bureau's capacity to maintain infrastructure, restore habitat, educate visitors, monitor changing conditions, respond to emergencies, and implement practical conservation measures. Public participation under FLPMA and NEPA therefore serves not merely as a procedural obligation, but as an essential component of effective long-term stewardship.

Modern multiple-use stewardship also increasingly embraces systems thinking. Resource management decisions are now widely understood to influence ecological processes, transportation infrastructure, recreation patterns, economic vitality, community resilience, wildfire preparedness, cultural resource protection, watershed health, and public safety simultaneously. Effective planning therefore requires agencies to evaluate these interrelated systems collectively rather than optimizing individual resource objectives independently. Such an integrated perspective is entirely consistent with FLPMA's emphasis on balancing diverse public values because it recognizes that long-term conservation success depends upon sustaining healthy relationships among ecological, social, economic, and administrative systems rather than maximizing any single management objective at the expense of others.

The Dinosaur North TMP presents an excellent opportunity for the Bureau to demonstrate this modern approach to multiple-use stewardship. The Draft EA reflects an understanding that



transportation planning encompasses far more than route inventories or isolated resource analyses. By continuing to strengthen the Final EA through route-specific analysis, adaptive management, targeted mitigation, transportation network functionality, collaborative stewardship, and evidence-based decision-making, the Bureau can develop a TMP that remains scientifically credible, operationally practical, legally durable, and fully consistent with the balanced stewardship philosophy Congress established through FLPMA.

Ultimately, modern multiple-use stewardship is not measured by the number of routes designated or closed, nor by the degree to which any single resource objective is prioritized above all others. Rather, it is measured by the Bureau's ability to sustain healthy landscapes while continuing to provide meaningful opportunities for the diverse public uses Congress expressly directed it to accommodate. A transportation system that protects natural resources, supports administrative efficiency, maintains public safety, preserves recreational opportunity, strengthens local communities, facilitates scientific research, and remains sufficiently adaptable to respond to future conditions most faithfully fulfills both the letter and the spirit of FLPMA's enduring multiple-use mandate.

Implementing Congress's Multiple-Use Vision Through Informed Decision-Making

While FLPMA establishes the Bureau's substantive responsibility to manage public lands for multiple use and sustained yield, it does not prescribe the procedural methodology through which individual planning decisions are to be developed. That role is fulfilled by the National Environmental Policy Act (NEPA), which provides the analytical framework through which federal agencies evaluate management alternatives, assess environmental consequences, incorporate scientific information, engage the public, and explain the reasoning supporting their decisions. Together, FLPMA and NEPA form complementary components of the federal public land management framework: FLPMA establishes *what* Congress directed the Bureau to accomplish, while NEPA establishes *how* the Bureau must evaluate alternative means of accomplishing those objectives.

This distinction is particularly important within travel management planning. FLPMA does not identify which specific roads should remain designated, which routes may require seasonal management, or where mitigation measures should be implemented. Instead, it establishes the overarching statutory principles... including multiple use, sustained yield, balanced stewardship, prevention of unnecessary or undue degradation, and long-term public benefit... that should guide those decisions. NEPA, in turn, requires the Bureau to evaluate reasonable alternatives capable of fulfilling those statutory purposes, disclose their environmental consequences, consider the best available scientific information, meaningfully respond to public input, and



demonstrate that the selected management approach is supported by a rational analysis contained within the administrative record.

Accordingly, the adequacy of the Final EA should not be evaluated solely according to the volume of environmental information presented, but according to whether the planning process meaningfully integrates the congressional direction established by FLPMA into the Bureau's analysis of alternatives and ultimate decision-making. An EA that thoroughly documents environmental conditions but fails to adequately evaluate transportation system functionality, multiple-use considerations, recreation values, adaptive management opportunities, or less restrictive mitigation measures risks failure to implement Congress's comprehensive management framework. Conversely, a planning process that fully integrates these statutory objectives into its environmental analysis provides the Bureau with a far stronger foundation for selecting a balanced, evidence-based, and legally durable TMP.

The following segment of our comment letter examines the Draft EA through the procedural requirements of NEPA. Consistent with the principles discussed regarding FLPMA, our comments focus not upon advocating predetermined management outcomes, but upon ensuring that the Bureau's decision-making process remains comprehensive, transparent, scientifically rigorous, and faithful to the balanced multiple-use stewardship philosophy Congress established through FLPMA. It is through the disciplined application of NEPA's procedural safeguards that the Bureau can most effectively translate Congress's enduring vision for the public lands into practical, sustainable, and defensible management decisions for the Dinosaur North TMA.

NEPA REQUIREMENTS FOR REASONED DECISIONMAKING

The National Environmental Policy Act ("NEPA") serves as the procedural counterpart to the substantive public land management responsibilities established by FLPMA. As discussed in the preceding section, FLPMA establishes Congress's vision for the stewardship of the public lands by directing the BLM to manage those lands under principles of multiple use, sustained yield, balanced resource stewardship, and prevention of unnecessary or undue degradation. NEPA, in turn, establishes the framework through which the Bureau evaluates alternative methods of implementing those statutory responsibilities, incorporates scientific information into agency decision-making, considers public input, and develops an administrative record capable of supporting informed and legally defensible management decisions.

Recent changes to the federal regulatory framework governing NEPA implementation have not altered these fundamental statutory principles. In January 2026, the Council on Environmental Quality rescinded its government-wide NEPA implementing regulations, returning primary



responsibility for implementation to the statute itself, agency-specific procedures, and longstanding judicial precedent. This regulatory change did not diminish NEPA's purpose or the Bureau's obligation to make informed, transparent, evidence-based decisions. Rather, it reinforces that the Bureau's authority derives directly from Congress and that judicial review continues to focus upon whether agencies have exercised reasoned professional judgment supported by an adequate administrative record, rather than strict adherence to formerly centralized procedural regulations.

UPLA therefore evaluates the Draft EA through the lens of contemporary administrative law rather than obsolete procedural requirements. Our comments do not advocate for a particular management outcome simply because it would preserve greater public access or favor one user group over another. Rather, our comments seek to ensure that the Bureau's ultimate decision reflects the deliberate, informed, and balanced decision-making process Congress intended NEPA to foster. Throughout this comment letter, we urge the Bureau to continue strengthening the analytical foundation of the Final EA by emphasizing evidence-based reasoning, route-specific analysis, adaptive management, transparent explanation of agency conclusions, and careful consideration of reasonable alternatives capable of satisfying both FLPMA's multiple-use mandate and NEPA's commitment to informed governmental decision-making.

NEPA Exists to Improve Federal Decision-Making

Although NEPA is often described as the nation's foundational environmental statute, its principal function is not to dictate environmental outcomes or require agencies to select the least environmentally impactful alternative. Rather, **NEPA was enacted to improve the quality of federal decision-making by ensuring that agencies possess sufficient information to understand the consequences of proposed actions before irreversible commitments are made.** Congress recognized that better governmental decisions require comprehensive information, interdisciplinary analysis, meaningful public participation, and thoughtful evaluation of competing courses of action. Environmental review therefore exists not as an end in itself, but as a mechanism for improving the substance and transparency of agency decision-making.

The Supreme Court has consistently recognized this distinction. NEPA is fundamentally procedural in nature. It does not mandate particular substantive results, nor does it elevate environmental protection above every other public interest entrusted to federal agencies. Instead, NEPA ensures that agencies fully consider relevant environmental information before exercising the discretion delegated to them by Congress. In doing so, NEPA strengthens, not restricts, agency discretion by ensuring that management decisions are informed by the best available



information rather than unsupported assumptions, incomplete analysis, or institutional preference.

This understanding is particularly important within travel management planning. The purpose of preparing a Travel Management Plan is not merely to identify environmental resources throughout the planning area or to document potential interactions between transportation infrastructure and those resources. Rather, the planning process exists to assist the Bureau in making better management decisions regarding the future designation and administration of the transportation network. Consequently, **the adequacy of an EA must be evaluated according to whether it meaningfully informs those decisions, not simply according to the quantity of environmental information compiled within the document.**

Decision quality is therefore the central organizing principle of NEPA. Every component of the environmental review process should contribute to improving the Bureau's understanding of the planning area and strengthening the rationale supporting its ultimate decisions. Resource inventories provide baseline information. Scientific analysis evaluates potential consequences. Alternatives allow managers to compare different approaches. Public participation introduces local knowledge and practical experience. Interdisciplinary review integrates expertise across resource disciplines. Collectively, these elements reduce uncertainty, illuminate tradeoffs, and improve the Bureau's ability to balance the diverse public interests Congress directed it to consider under FLPMA.

This reinforces the complementary relationship between NEPA and multiple-use management. Because FLPMA requires the Bureau to balance numerous legitimate public values rather than maximize any single objective, agency decision-makers necessarily must evaluate complex interactions among recreation, wildlife, cultural resources, watershed health, transportation infrastructure, public safety, local economies, scientific research, and numerous other considerations. NEPA provides the analytical process through which these relationships can be examined systematically and transparently before management decisions are finalized. Accordingly, UPLA calls attention to the fact that the Final EA must continue emphasizing analytical rigor over procedural formality. **The ultimate question is not whether the document contains extensive discussion of environmental resources, but whether the environmental analysis meaningfully improves the Bureau's understanding of the management choices before it and provides a rational foundation for selecting the alternative that most effectively fulfills Congress's multiple-use direction under FLPMA.**

Reasoned Decision-Making and the "Hard Look"



Central to NEPA's purpose is the principle that agencies must engage in reasoned decision-making supported by objective analysis rather than conclusory assertions or predetermined outcomes. Courts have long recognized that NEPA requires agencies to take a "hard look" at the environmental consequences of proposed actions before making decisions that affect public resources. This requirement does not demand perfect scientific certainty, exhaustive analysis of every conceivable issue, or elimination of all disagreement among experts. Rather, it requires agencies to thoughtfully examine relevant information, honestly acknowledge uncertainty where it exists, evaluate competing evidence, and articulate a rational explanation connecting the information contained within the administrative record to the management decisions ultimately adopted.

The Supreme Court has repeatedly emphasized that federal courts do not substitute their judgment for that of agency experts. **Agencies possess substantial technical expertise regarding the resources they manage, and professional judgments supported by reasoned analysis are entitled to considerable deference. That deference, however, is earned through transparent reasoning rather than presumed by virtue of agency status alone.** The Bureau's expertise carries its greatest persuasive force when the administrative record clearly demonstrates how scientific information, field observations, interdisciplinary analysis, and professional judgment collectively informed the agency's conclusions.

This distinction is particularly significant in travel management planning because transportation decisions frequently involve competing resource considerations rather than simple questions of environmental protection versus public access. A designated route may provide important recreational opportunities while also traversing wildlife habitat, supporting wildfire response, facilitating cultural resource management, providing administrative access, or serving as an important connection within the broader transportation network. Reasoned decision-making requires the Bureau to evaluate these overlapping considerations holistically rather than allowing any single resource concern to automatically dictate the outcome of the analysis.

Reasoned decision-making likewise requires proportionality between the evidence available and the management response selected. Where the administrative record demonstrates substantial, well-documented resource impacts that cannot reasonably be mitigated through engineering improvements, seasonal management, maintenance, visitor education, restoration, or other adaptive management strategies, route closure may represent an appropriate management response. Conversely, where evidence demonstrates limited impacts, uncertainty regarding causal relationships, or opportunities for effective mitigation, the rationale supporting permanent closure necessarily requires substantively more detailed explanation. The greater the management consequence associated with a particular decision, the more important it becomes



that the administrative record clearly articulate why that decision represents the most reasonable means of accomplishing the Bureau's statutory objectives.

UPLA believes the Draft EA reflects considerable professional effort and interdisciplinary expertise. The planning area encompasses a remarkably diverse array of natural resources, recreational opportunities, cultural landscapes, administrative responsibilities, and public uses that necessarily require thoughtful balancing. Our comments are therefore not intended to diminish the Bureau's expertise, but rather to strengthen the administrative record by illuminating the requirement for more explicit explanation of how that expertise supports individual route designations, transportation network decisions, and selection of the preferred alternative. A transparent explanation of agency reasoning not only improves public understanding but also reinforces the legal durability of the Final TMP.

Ultimately, the "hard look" principle should be understood not as a procedural hurdle but as a hallmark of good governance. Agencies produce their strongest decisions when they rigorously evaluate evidence, acknowledge competing considerations, explain their reasoning, and demonstrate that management actions follow logically from the information before them. UPLA urges the Bureau to continue strengthening the Final EA through this model of transparent, evidence-based decision-making.

Alternatives Are the Heart of Good Decision-Making

Perhaps no aspect of NEPA contributes more directly to informed governmental decision-making than the evaluation of reasonable alternatives. Alternatives analysis lies at the core of environmental review because it transforms environmental information into practical management choices. Resource inventories describe existing conditions. Scientific analysis identifies potential consequences. Alternatives allow decision-makers to compare different methods of achieving management objectives while balancing competing public interests. Without meaningful alternatives, environmental review becomes little more than an inventory of existing resources rather than a genuine decision-making process.

The value of alternatives analysis extends far beyond identifying the least restrictive or most restrictive management option. Rather, alternatives allow agencies to explore how different combinations of management strategies influence environmental protection, public access, administrative efficiency, transportation network functionality, implementation feasibility, monitoring requirements, and long-term stewardship objectives. By comparing these different approaches, decision-makers gain a more complete understanding of the tradeoffs associated



with each management strategy and are better positioned to select the alternative that most effectively fulfills the Bureau's statutory responsibilities.

Importantly, alternatives need not be viewed as rigid or mutually exclusive management packages. Effective planning frequently results in refinement of alternatives through the planning process as agencies receive new scientific information, public comments, field observations, and interdisciplinary recommendations. Indeed, one of NEPA's greatest strengths is its capacity to improve agency proposals through iterative analysis and public engagement. A well-developed EA should therefore encourage refinement of alternatives where doing so better satisfies the planning objectives established by the Bureau while reducing environmental impacts or preserving important public values.

This principle has particular relevance to the Dinosaur North TMP. Throughout this comment letter, **we emphasize support for a Modified Alternative D rather than unconditional adoption of Alternative D as presented in the Draft EA.** This position reflects our belief that the Draft EA provides a strong analytical foundation while also presenting opportunities for further refinement through route-specific evaluation, adaptive management, targeted mitigation, and additional consideration of transportation network functionality. Such refinement is entirely consistent with the purpose of NEPA because it demonstrates that the environmental review process has successfully informed and improved agency decision-making rather than merely documenting preexisting management preferences.

Accordingly, UPLA encourages the Bureau to continue viewing the Final EA as an opportunity to strengthen, not simply finalize, the proposed transportation system. The most effective TMP will not necessarily be the alternative containing the greatest number of route closures or the greatest amount of retained access. Rather, it will be the alternative that most effectively balances Congress's multiple-use mandate with sustainable resource stewardship through thoughtful, evidence-based management supported by a comprehensive administrative record.

Environmental Analysis Must Inform Decisions - Not Merely Describe Resources

One of the most important distinctions within environmental review is the difference between resource inventory and environmental analysis. Inventory documents what exists. Analysis explains why that information matters to the management decision before the agency. Although both are essential components of informed planning, they perform fundamentally different functions within the decision-making process.



Travel management planning often involves extensive documentation of wildlife habitat, vegetation communities, soils, hydrology, cultural resources, scenic values, recreation opportunities, and other environmental features occurring throughout the planning area. These inventories provide indispensable baseline information regarding existing conditions and establish the context within which management decisions are made. However, the mere presence of environmental resources does not itself determine the appropriate management response. Public lands are, by definition, landscapes containing valuable natural, cultural, recreational, and scientific resources. If the existence of sensitive resources alone justified restricting public access, the multiple-use framework established by Congress would become exceedingly difficult to implement because nearly every square acre of public lands contains resources worthy of thoughtful stewardship.

Meaningful environmental analysis therefore requires an additional step. It requires the Bureau to explain how identified resource conditions relate to the management decisions under consideration. Where transportation routes intersect wildlife habitat, cultural resources, riparian areas, or other environmentally sensitive features, the analysis should clearly describe the nature of the interaction, the evidence supporting the Bureau's assessment of potential impacts, the degree to which those impacts are attributable to continued designated use, the effectiveness of existing management measures, and whether less restrictive management approaches could reasonably achieve comparable resource protection. In other words, environmental analysis should illuminate the relationship between observed conditions and proposed management actions rather than assuming that one necessarily follows from the other.

This distinction becomes particularly important where route closures are proposed. Statements that a route traverses suitable habitat, occurs within a watershed, crosses erodible soils, or passes near cultural resources describe important environmental conditions, but they do not independently explain why closure represents the most appropriate management response. Rather, the administrative record should demonstrate why continued designated use would produce impacts inconsistent with the Bureau's statutory obligations and why available mitigation measures, engineering improvements, maintenance practices, seasonal restrictions, monitoring, restoration efforts, or other adaptive management strategies would be insufficient to address the identified concerns.

UPLA calls attention to the fact that the Draft EA already contains a substantial body of environmental information capable of supporting these analyses. As the Bureau prepares the Final EA, it is pertinent for the Final EA to explicitly connect environmental information to management conclusions in order to achieve relevant and adequately rigorous transparency, credibility, and legal defensibility of the planning process. **Environmental review is only**



effective when it moves beyond describing landscapes to explaining why the evidence supports the decisions ultimately made regarding their stewardship. That analytical connection forms the foundation upon which informed, balanced, and durable public land management decisions are built.

The Administrative Record Must Connect Evidence to Conclusions

As we have noted previously, the ultimate measure of an EA is not the volume of information it contains, but whether the administrative record demonstrates a logical, transparent, and evidence-based progression from the facts identified during the planning process to the management decisions ultimately adopted. This principle lies at the heart of reasoned administrative decision-making. Agencies are afforded substantial discretion precisely because they possess technical expertise; however, that expertise must be exercised through a process that clearly explains how scientific information, field observations, interdisciplinary analysis, and professional judgment collectively support the conclusions reached. The administrative record should therefore function not simply as a repository of information, but as a coherent explanation of the Bureau's reasoning.

An effective administrative record generally follows a straightforward analytical progression:

**Observed Conditions → Scientific Analysis → Professional Judgment →
Management Decision → Monitoring and Adaptive Implementation**

Each step should logically support the next. Resource inventories establish baseline conditions. Scientific analysis evaluates the significance of those conditions and the likely consequences of continued management. Professional judgment interprets that information within the context of statutory obligations and management objectives. Management decisions identify the actions selected to address the identified concerns. Finally, monitoring provides the mechanism through which those decisions can be evaluated and refined as new information becomes available. When this progression is clearly documented, the public can understand why particular management actions were selected, cooperating agencies can evaluate the reasoning supporting those decisions, and reviewing courts can readily determine whether the Bureau exercised reasoned judgment consistent with its statutory authority.

Travel management planning particularly benefits from this analytical framework because transportation decisions frequently involve balancing multiple legitimate public interests rather than resolving simple questions of environmental impact. A designated route may simultaneously provide recreational access, administrative access, wildfire response capability,



wildlife monitoring opportunities, cultural resource management access, and connections within the broader transportation network while also traversing sensitive soils, wildlife habitat, or riparian areas. Reasoned decision-making therefore requires more than identifying environmental concerns. It requires explaining why those concerns warrant the specific management action selected after considering the full range of public values affected by the decision.

This distinction is especially important where route closures are proposed. The existence of sensitive habitat, archaeological resources, steep slopes, or erosive soils does not, standing alone, establish that closure is the most appropriate management response. Instead, the administrative record should demonstrate why continued designated use would result in impacts inconsistent with the Bureau's statutory responsibilities, why available mitigation measures would be insufficient to address those impacts, and why the selected management action best balances the competing public interests Congress directed the Bureau to consider under FLPMA. Without this analytical connection, the relationship between evidence and management decisions becomes less transparent and more difficult for the public to evaluate.

Conversely, where the Bureau concludes that designated routes can remain open despite the presence of sensitive resources, the administrative record should likewise explain why continued access remains compatible with long-term resource stewardship. Such explanations reinforce public confidence that transportation decisions are based upon objective analysis rather than assumptions regarding particular forms of recreation or generalized management philosophies. Transparency strengthens administrative discretion because it demonstrates that management decisions reflect thoughtful professional judgment rather than predetermined outcomes.

Route-Specific Analysis Strengthens Transportation Planning

Although travel management planning necessarily evaluates landscapes at broad geographic scales, transportation decisions are ultimately implemented one route at a time. Every designation, seasonal restriction, limited-use designation, or closure applies to specific roads and trails that collectively comprise the transportation network. Consequently, the strength of a TMP depends largely upon the Bureau's ability to explain why individual route decisions appropriately implement the broader planning objectives identified throughout the EA.

This principle does not require every route to receive identical levels of documentation or independent environmental analysis. Large-scale planning necessarily relies upon landscape-level assessments, GIS analysis, field inventories, resource modeling, and interdisciplinary professional judgment to evaluate extensive transportation systems efficiently. However, where specific management actions substantially alter public access, eliminate important transportation



connections, or respond to identified resource concerns, the administrative record should provide sufficient route-specific reasoning to demonstrate how the available evidence supports the proposed designation. Generalized descriptions of landscape conditions, while valuable for understanding regional context, rarely explain why one route remains designated while another is proposed for closure, particularly where the routes traverse similar resource conditions or perform comparable transportation functions.

Route-specific analysis is particularly important because transportation corridors perform remarkably diverse functions that may not be readily apparent from resource inventories alone. Individual routes contribute differently to network connectivity, loop opportunities, emergency response, wildfire suppression, administrative access, dispersed camping, hunting access, livestock management, scientific research, maintenance operations, and visitor distribution across the landscape. Some routes serve as primary travel corridors supporting multiple public uses, while others provide localized access to recreation sites, historic resources, trailheads, or scenic viewpoints. Still others function primarily as redundant connections that improve transportation system resilience during wildfire, flooding, maintenance activities, or seasonal closures. These differing functions influence the relative importance of each route within the overall transportation system and should therefore inform route designation decisions alongside environmental considerations.

Similarly, environmental impacts themselves often vary considerably among individual routes despite occurring within broadly similar resource settings. Differences in topography, drainage characteristics, route design, maintenance history, vegetation cover, visitor use patterns, engineering improvements, seasonal conditions, and existing mitigation measures may substantially influence the magnitude of potential impacts associated with continued designated use. Route-specific analysis allows these distinctions to be evaluated transparently while avoiding overly generalized conclusions based solely upon landscape-scale resource mapping.

UPLA recognizes that the Draft EA incorporates landscape-level analysis throughout the planning area and acknowledges the practical necessity of evaluating broad resource patterns during travel management planning. Nevertheless, the Final EA must be strengthened by articulating explicitly how specific transportation decisions relate to documented route conditions, transportation functionality, available mitigation opportunities, and the Bureau's broader multiple-use responsibilities. This route-specific perspective aligns with the practical realities of long-term transportation management. Future monitoring, maintenance, restoration, engineering improvements, and adaptive management all occur at the route level. Developing a clear administrative rationale for individual route decisions therefore establishes an important baseline against which future management effectiveness can be evaluated. It allows the Bureau



to determine whether anticipated resource concerns materialize, whether mitigation measures perform as expected, and whether changing conditions warrant future management adjustments. In this manner, route-specific analysis strengthens not only the initial planning decision but also the Bureau's capacity for adaptive stewardship over time.

Scientific Uncertainty Supports Adaptive Management

One of the defining characteristics of responsible natural resource management is the recognition that uncertainty is an inherent component of ecological systems. Landscapes continually respond to wildfire, drought, invasive species, climatic variability, changing recreation patterns, hydrologic processes, wildlife population dynamics, vegetation succession, and countless other natural and human influences. Scientific understanding likewise evolves as monitoring data accumulate, management experience expands, and new research becomes available. Effective public land management therefore requires agencies not to eliminate uncertainty, but to manage uncertainty responsibly through continual learning and adaptive implementation.

Adaptive management provides an established framework for accomplishing this objective. Rather than treating management decisions as fixed endpoints, adaptive management recognizes them as informed hypotheses subject to evaluation through monitoring and subsequent refinement. Management actions are implemented based upon the best available information, their effectiveness is monitored over time, and future decisions are adjusted as new evidence becomes available. This iterative process allows agencies to respond proportionally to changing conditions while avoiding unnecessarily rigid management approaches based upon incomplete or uncertain information.

Within the context of travel management, adaptive management offers particularly important advantages. Transportation systems are uniquely suited to incremental management because routes can often be improved through engineering modifications, drainage improvements, reroutes, seasonal management, maintenance, visitor education, restoration, signing, enforcement, or targeted mitigation without permanently eliminating public access. These management tools provide agencies with considerable flexibility to address localized resource concerns while preserving the transportation infrastructure necessary to support Congress's multiple-use mandate.

Accordingly, uncertainty regarding future resource conditions should generally encourage greater emphasis on monitoring and adaptive implementation rather than automatic adoption of the most restrictive available management option. Where evidence clearly demonstrates that continued designated use would produce unacceptable impacts that cannot reasonably be



mitigated, more restrictive management may certainly be appropriate. However, where uncertainty remains regarding the magnitude, extent, causation, or persistence of anticipated impacts, adaptive management frequently provides a more balanced approach because it allows the Bureau to respond to observed conditions rather than hypothetical outcomes. Such an approach improves decision quality by replacing speculation with empirical observation while maintaining flexibility to strengthen or relax management measures as circumstances warrant.

This philosophy also reflects prudent stewardship of public infrastructure. Roads and trails represent substantial public investments that support recreation, emergency response, scientific research, administrative management, wildfire suppression, and numerous other authorized public uses. **Permanent elimination of transportation infrastructure must therefore be reserved solely for circumstances where the administrative record explicitly demonstrates that less restrictive management approaches cannot reasonably achieve the Bureau's conservation objectives. Adaptive management enables the Bureau to preserve future management flexibility while continuing to protect sensitive resources through evidence-based implementation.**

UPLA urges the Bureau to continue incorporating adaptive management throughout the Final TMP. Monitoring protocols, measurable performance indicators, periodic evaluation, and collaborative stewardship partnerships provide practical mechanisms for ensuring that transportation decisions remain responsive to changing environmental conditions and emerging scientific understanding. Such an approach reflects contemporary resource management science while remaining fully consistent with FLPMA's balanced stewardship philosophy and NEPA's commitment to informed decision-making.

Public Participation Improves Decision Quality

Meaningful public participation is often described as one of NEPA's procedural requirements. While this characterization is accurate, it understates the more important role public involvement serves within effective public land management. Public participation is not valuable merely because it satisfies a statutory obligation; it improves the quality of agency decision-making by expanding the information available to decision-makers and strengthening the administrative record upon which those decisions are based.

The Bureau manages extraordinarily diverse landscapes encompassing complex ecological systems, extensive transportation networks, rich cultural histories, and longstanding recreational traditions. No single agency, regardless of its expertise, can independently possess complete knowledge regarding every aspect of these landscapes. County governments contribute



transportation planning expertise and emergency response experience. Tribal governments provide irreplaceable cultural and historical knowledge. Academic researchers contribute scientific investigations spanning decades. Grazing permittees, outfitters, recreation organizations, sportsmen, local residents, conservation groups, volunteer trail crews, and frequent public land users collectively possess extensive firsthand knowledge regarding route conditions, visitor behavior, maintenance needs, wildlife observations, historical travel patterns, seasonal access issues, and practical management solutions developed through years of direct experience on the landscape.

This local and institutional knowledge represents an vital and necessary complement to the Bureau's technical expertise. Public comments frequently identify field conditions that are not readily apparent from GIS data or regional resource inventories, highlight opportunities for mitigation that have been overlooked, provide historical context regarding long-established transportation routes, identify practical engineering solutions, or describe changing recreational use patterns that influence transportation planning. When integrated thoughtfully with interdisciplinary scientific analysis, this information substantially improves both the completeness of the administrative record and the quality of the Bureau's final decisions.

The diversity of perspectives reflected throughout the planning process for this Draft EA demonstrates the significance of the Dinosaur North planning area to numerous stakeholders and underscores the importance of developing a transportation system capable of accommodating a broad range of equally legitimate public interests. Robust public participation should therefore be viewed not as an obstacle to efficient planning but as one of the Bureau's greatest assets for improving management outcomes.

As an organization representing thousands of responsible public land users throughout Utah and the West, UPLA offers its comments in that same collaborative spirit. Our recommendations are intended to supplement the administrative record with practical transportation knowledge, recreation experience, stewardship perspectives, and analysis developed through decades of active engagement with public land management issues. We urge the Bureau to continue treating public participation as an ongoing component of adaptive stewardship extending well beyond completion of this planning effort.

Transition to Alternatives Analysis

The principles we've discussed thus far establish a consistent framework for evaluating the alternatives presented in the Draft EA. NEPA does not require the Bureau to select the most restrictive alternative, nor does it require selection of the least restrictive alternative. It requires



the Bureau to exercise informed professional judgment based upon a transparent evaluation of available evidence, reasonable alternatives, interdisciplinary expertise, public participation, and Congress's broader statutory direction under FLPMA.

Accordingly, the central question before the Bureau is not whether one alternative closes more routes or retains more access than another. Rather, the relevant inquiry is which alternative is supported by the most comprehensive and transparent analysis, best integrates the diverse public values Congress directed the Bureau to balance, most effectively protects sensitive resources through sustainable management, and provides the greatest long-term benefit to the American people consistent with the Bureau's multiple-use responsibilities.

The analyses that follow evaluate the Draft EA through this framework. UPLA's support for a thoughtfully refined **Modified Alternative D** is not based upon a preference for motorized recreation in isolation, but upon our conclusion that Alternative D, with targeted modifications informed by route-specific analysis, adaptive management, transportation network science, and contemporary principles of multiple-use stewardship, most effectively fulfills both the substantive objectives established by FLPMA and the reasoned decision-making process required by NEPA. The following sections explain this conclusion in greater detail as they relate to individual resource topics, transportation network functionality, and the specific route designations evaluated throughout the Dinosaur North TMP.

ALTERNATIVES ANALYSIS

Evaluating Alternatives Through the Lens of FLPMA and NEPA

The purpose of NEPA alternatives analysis is not simply to identify the alternative that retains the greatest number of routes or, conversely, the alternative that produces the greatest degree of environmental restriction. **Neither NEPA nor FLPMA establishes such a binary framework for public land management. Rather, both statutes contemplate a more comprehensive evaluation that considers how each management alternative fulfills the Bureau's statutory responsibilities while balancing the diverse public values entrusted to federal stewardship.** Consequently, we have evaluated the alternatives presented in the Draft EA through the integrated planning framework discussed throughout the preceding sections of this comment letter.

As discussed previously, FLPMA requires the Bureau to manage the public lands under principles of multiple use and sustained yield, balancing recreational opportunities, wildlife conservation, watershed protection, cultural resources, scenic values, livestock grazing, mineral



development, scientific research, public safety, and numerous other legitimate public interests. NEPA complements these responsibilities by requiring informed decision-making supported by objective analysis, meaningful evaluation of alternatives, and a transparent administrative record explaining the rationale underlying agency decisions. Together, these statutes encourage management solutions that are balanced, evidence-based, adaptable, and sustainable over the long term rather than those that maximize any single resource objective at the expense of others.

UPLA also wishes to specifically commend the Vernal Field Office for recognizing and correcting a significant shortcoming of the previous Dinosaur North Travel Management Plan by identifying and evaluating numerous existing routes that had been inadvertently omitted from the earlier planning process. The inclusion of these routes within Alternatives C and D reflects the Bureau's willingness to improve the completeness and accuracy of the transportation inventory in response to public input and field verification, and represents an important step toward a more comprehensive and functional transportation network. We appreciate the considerable effort invested in identifying these omitted routes and incorporating them into the current planning process. At the same time, given the size and complexity of the approximately 345,000-acre planning area, it is entirely reasonable to anticipate that additional existing routes omitted from previous inventories may continue to be discovered through future fieldwork, implementation, volunteer stewardship activities, or public reporting. The Final Travel Management Plan should therefore recognize that the designated transportation system may require future administrative refinement as additional information becomes available. To promote transparency and reduce unnecessary confusion, the Record of Decision should also clearly explain the administrative process through which counties, cooperating agencies, organizations, and members of the public may request evaluation of previously overlooked existing routes discovered after issuance of the decision, including any available appeal, reconsideration, plan amendment, or maintenance-level administrative procedures that may be appropriate under applicable BLM regulations.

Accordingly, our alternative analysis centers on **nine** interrelated planning principles that collectively reflect both FLPMA's substantive direction and NEPA's decision-making framework.

Multiple-Use Stewardship. The extent to which an alternative maintains an appropriate balance among recreation, conservation, administrative access, wildfire response, cultural resource protection, livestock management, scientific research, and other authorized public land uses without disproportionately prioritizing one objective over the others.

Transportation Network Functionality. The degree to which the transportation system functions as an integrated network rather than a collection of individual routes. This includes



connectivity, redundancy, circulation, emergency access, maintenance efficiency, visitor distribution, recreational quality, and overall transportation system resilience.

Sustainable Recreation. Whether recreational access is accommodated in a manner that promotes long-term stewardship through designated routes, concentrated use, visitor education, volunteer partnerships, responsible management, and continued public investment in conservation.

Resource Protection. The effectiveness with which an alternative conserves wildlife habitat, watersheds, vegetation communities, soils, cultural resources, visual resources, and other sensitive public land values while recognizing that conservation and public access are complementary rather than inherently conflicting objectives.

Adaptive Management. The extent to which management remains sufficiently flexible to respond to new scientific information, changing environmental conditions, monitoring results, engineering improvements, restoration opportunities, and evolving management needs without unnecessarily foreclosing future options.

Scientific Support. Whether proposed management actions are proportional to the evidence contained within the administrative record and supported by transparent analysis that clearly connects documented resource conditions to the management decisions ultimately selected.

Administrative Flexibility. The ability of the Bureau to effectively administer, maintain, monitor, enforce, and modify the transportation system over time while efficiently responding to wildfire, flooding, infrastructure maintenance, habitat restoration, emergency response, and other operational requirements.

Long-Term Stewardship. Whether the alternative establishes a transportation system capable of remaining ecologically, socially, economically, and administratively sustainable over future decades while preserving the Bureau's ability to adapt to changing conditions and future scientific understanding.

Completeness and Administrative Correctness of the Transportation Inventory. The extent to which an alternative accurately reflects the existing transportation system by incorporating all lawfully established and historically existing routes identified through agency inventories, field verification, and public participation. A durable Travel Management Plan should recognize that transportation inventories are iterative by nature and that previously overlooked routes may continue to be identified following implementation. The Final TMP should therefore preserve an



efficient, transparent administrative mechanism through which such routes may be evaluated and, where appropriate, incorporated into the designated transportation system without requiring unnecessary repetition of the entire planning process. Recognizing and correcting omissions strengthens both the accuracy of the transportation network and the legal defensibility of the Bureau's decision-making under FLPMA and NEPA.

Collectively, these evaluation criteria recognize an important principle that extends throughout this comment letter: **travel management planning is fundamentally an exercise in transportation planning rather than route elimination.** Roads and trails do not function independently of one another. They operate as interconnected infrastructure supporting virtually every authorized use occurring across the planning area. Consequently, alternatives should be evaluated according to how effectively they function as complete transportation systems rather than according to the number of miles retained or closed.

This systems-based perspective is particularly important because transportation infrastructure itself contributes to conservation. Properly designed designated route systems concentrate recreation, reduce dispersed travel, facilitate maintenance, improve law enforcement efficiency, support wildfire suppression and emergency response, enable scientific monitoring, provide administrative access, and encourage visitor compliance by directing use toward sustainable corridors. Reducing transportation infrastructure may, under appropriate circumstances, improve resource protection; however, infrastructure reduction is not inherently synonymous with improved stewardship. In some circumstances, excessive network fragmentation may inadvertently concentrate recreational use, reduce management flexibility, diminish emergency response capabilities, complicate maintenance operations, or displace visitors into more environmentally sensitive locations.

Accordingly, our evaluation of the Draft EA alternatives focuses not upon identifying the "most open" or "most restrictive" transportation system, but rather upon identifying the alternative that most effectively integrates conservation, transportation planning, adaptive management, recreation, and multiple-use stewardship into a durable management framework capable of serving the American public for decades to come.

Using this analytical framework, we conclude that **Alternative D provides the strongest overall foundation for achieving the Bureau's planning objectives.** However, as discussed later in this section and throughout the route-specific analyses contained elsewhere in this comment letter, we assert the legal and administrative imperative that **Alternative D must be further strengthened through targeted modifications that improve transportation network functionality, increase reliance upon adaptive management, and retain selected routes**



where the administrative record does not demonstrate that permanent closure represents the least environmentally disruptive or most effective management solution. These refinements would preserve Alternative D's considerable strengths while more fully implementing the balanced stewardship principles embodied within both FLPMA and NEPA.

Alternative A - No Action

Alternative A provides the baseline against which the action alternatives are evaluated and serves an important analytical purpose within the EA. By maintaining the existing transportation designations and current management framework, the No Action Alternative illustrates how management would continue absent implementation of a new TMP. This baseline allows the Bureau, cooperating agencies, stakeholders, and the public to compare the environmental consequences of proposed management changes against existing conditions while satisfying NEPA's requirement to evaluate the consequences of maintaining the status quo.

UPLA recognizes the analytical necessity of Alternative A and appreciates its inclusion within the Draft EA. Existing designated transportation systems often represent decades of accumulated management experience, public use patterns, maintenance investment, and practical adaptation to local topography and resource conditions. Consequently, Alternative A reflects a transportation network that has evolved through both administrative management and long-term public use rather than theoretical planning assumptions alone. Existing routes also continue to provide substantial recreational opportunities, administrative access, emergency response capability, wildfire suppression access, livestock management infrastructure, dispersed camping access, hunting opportunities, scientific research access, and transportation connectivity throughout the planning area.

Nevertheless, while Alternative A establishes an important baseline for environmental comparison, UPLA does not believe it represents the most effective long-term management strategy for Dinosaur North.

The principal limitation of Alternative A is not that it retains excessive transportation infrastructure, but that it does not fully incorporate the considerable body of information developed during this planning effort. Travel management planning exists precisely because public land conditions evolve over time. Since previous route designations were established, the Bureau has accumulated additional resource inventories, improved GIS analyses, expanded interdisciplinary expertise, updated wildlife information, refined transportation planning methodologies, and received substantial public input regarding route conditions and management priorities. Simply maintaining the existing transportation system would not fully capitalize on these improvements in scientific understanding or management experience.



Similarly, Alternative A does not comprehensively integrate contemporary principles of adaptive management, transportation network analysis, engineering improvements, targeted restoration opportunities, or refined route designations informed by updated field investigations. Although many existing routes undoubtedly continue to function sustainably, the planning process has identified opportunities to improve the overall transportation system through better alignment with current management objectives, improved route designations, refined mitigation measures, and enhanced administrative consistency. The No Action Alternative necessarily leaves many of these opportunities unrealized.

Alternative A likewise provides relatively limited opportunity to resolve documented management challenges that have emerged since earlier transportation decisions were implemented. Public land management is inherently dynamic. Wildfire, flooding, invasive species, changing recreational use patterns, vegetation succession, infrastructure deterioration, evolving scientific understanding, and new conservation priorities all influence transportation planning over time. Effective stewardship requires periodic evaluation of these changing conditions to ensure that transportation systems continue supporting both conservation and public access objectives. By definition, the No Action Alternative does not fully respond to these evolving circumstances.

From a transportation planning perspective, Alternative A also reflects a network that was not necessarily designed using the integrated systems approach emphasized throughout this comment letter. While many existing routes undoubtedly continue serving important functions, the current network has developed incrementally through numerous historical management decisions rather than comprehensive transportation planning conducted across the entire planning area. The Draft EA appropriately provides the Bureau an opportunity to evaluate transportation connectivity, network redundancy, visitor distribution, administrative efficiency, and long-term sustainability more comprehensively than previous planning efforts.

Finally, Alternative A provides comparatively limited flexibility for implementing many of the adaptive management tools discussed earlier in this comment letter. Because it primarily preserves existing management without substantial refinement, it does not fully incorporate updated monitoring strategies, targeted mitigation measures, engineering improvements, route-specific management approaches, or other contemporary stewardship techniques capable of improving both resource protection and transportation system performance.

For these reasons, we do not support selection of Alternative A as the preferred alternative. While the existing transportation system provides an important foundation and demonstrates the



longstanding success of many designated routes, the Bureau has appropriately undertaken this planning effort to improve upon existing management rather than simply perpetuate it unchanged. UPLA believes the Final TMP should build upon the strengths of the existing transportation network while incorporating the best available science, modern transportation planning principles, adaptive management, and updated resource information developed through the current NEPA process.

Alternative B

Alternative B represents a meaningful advancement beyond the No Action Alternative by incorporating updated environmental analysis, interdisciplinary resource evaluation, and more deliberate consideration of long-term resource stewardship. UPLA appreciates the substantial work reflected throughout Alternative B and recognizes that it demonstrates thoughtful efforts by the Bureau to address identified resource concerns while continuing to provide a functional designated transportation system across the planning area. In many respects, Alternative B reflects a careful and professionally developed attempt to balance competing public land values through measured refinement of the existing transportation network.

One of Alternative B's principal strengths lies in its recognition that transportation planning should evolve in response to improved scientific understanding and changing resource conditions. Unlike Alternative A, Alternative B incorporates the extensive environmental analyses conducted during development of the Draft EA and attempts to address documented resource concerns through modifications to the designated transportation system. This reflects the adaptive, information-driven decision-making process that NEPA is intended to facilitate. Alternative B also demonstrates a primary commitment to protecting sensitive environmental resources. While this commitment is necessary and commendable, Alternative B elevates resource preservation as the superior value and use of the public land within Dinosaur North TMA, thereby disregarding the relevance and statutory protection of other values and uses. The alternative gives considerable attention to wildlife habitat, watershed integrity, vegetation communities, cultural resources, soils, and other resource values identified throughout the planning area. Conservation of public land resources is not merely compatible with responsible motorized recreation; it is essential to ensuring that recreational opportunities remain available for future generations. The OHV community has long recognized that sustainable recreation depends upon healthy landscapes, well-maintained transportation infrastructure, and responsible stewardship of the natural and cultural resources that make these public lands exceptional. However, conservation does not occur in a vacuum; conservation that is achieved by eradicating other values and uses is an arbitrary and capricious action within the context of FLPMA, NEPA, and congressional directives for public land management.



We call attention to the fact that Alternative B ultimately adopts a management philosophy that relies upon permanent transportation infrastructure reduction as the primary mechanism for addressing identified resource concerns.

Throughout the Draft EA, the resource issues discussed are capable of being addressed through a broader suite of management tools that include engineering improvements, drainage stabilization, route hardening, seasonal restrictions, visitor education, enhanced signing, volunteer maintenance partnerships, monitoring, restoration, enforcement, and other adaptive management techniques. These approaches frequently achieve meaningful conservation outcomes while preserving transportation connectivity and maintaining the flexibility necessary to respond to future monitoring results. Alternative B, while incorporating many thoughtful management improvements, appears in numerous instances to move relatively quickly toward route elimination where more targeted management approaches may reasonably accomplish comparable conservation objectives.

From a transportation planning perspective, Alternative B likewise begins to reduce elements of network redundancy that contribute positively to overall system resilience. Redundant routes are often viewed solely through the lens of duplication; however, transportation planning recognizes that strategic redundancy provides important operational benefits. Multiple connections improve emergency response capability, facilitate maintenance operations, distribute visitor use across broader landscapes, improve resilience following wildfire or flooding, and provide alternative travel corridors when temporary closures become necessary. Excessive reduction of transportation redundancy will increase recreational concentrations, reduce administrative flexibility, and complicate long-term transportation management.

Alternative B also presents fewer opportunities for adaptive implementation than are appropriate given the inherent uncertainty associated with ecological systems. As discussed previously, public land management benefits from retaining flexibility wherever monitoring and mitigation can reasonably address identified resource concerns. Because ecological conditions evolve over time and scientific understanding continues to improve, transportation systems must retain sufficient adaptability to accommodate future management refinements without requiring wholesale revisions to the designated route network.

This observation should not be interpreted as criticism of the Bureau's conservation objectives. Rather, it reflects the fact that **conservation is best achieved through active management rather than permanent infrastructure reduction**. Roads and trails themselves constitute management infrastructure. Properly maintained designated routes concentrate recreation within



actively managed corridors, improve compliance, facilitate restoration activities, support law enforcement, enable scientific monitoring, and reduce dispersed travel across sensitive landscapes. Preserving this infrastructure wherever compatible with long-term resource stewardship provides greater conservation benefits than eliminating infrastructure that can continue functioning sustainably through appropriate management.

Accordingly, while UPLA recognizes Alternative B as a professionally developed and scientifically informed management alternative, it does not effectively achieve the Bureau's stated planning objectives. The analytical foundation developed within Alternative B provides an important contribution to the planning process; however, Alternative D more effectively integrates transportation network functionality, adaptive management, administrative flexibility, and multiple-use stewardship while maintaining robust resource protection. As discussed in the following sections, targeted refinement of Alternative D further improves upon this balance and ultimately provides the strongest framework for sustainable management of the Dinosaur North transportation system.

Alternative C

Alternative C represents the most resource-protective transportation strategy evaluated in the Draft EA and reflects a management philosophy that places the greatest emphasis on reducing the physical footprint of the designated transportation system as a means of minimizing potential interactions with sensitive environmental resources. UPLA appreciates the Bureau's development of this alternative and recognizes that it demonstrates a commitment to conserving wildlife habitat, protecting watershed function, reducing disturbance within environmentally sensitive landscapes, and improving long-term ecological resilience. The conservation objectives reflected throughout Alternative C are both legitimate and consistent with the Bureau's statutory responsibilities under FLPMA.

Indeed, Alternative C serves an important purpose within the NEPA process by illustrating the extreme upper range of management actions that could be implemented if resource protection were afforded substantially greater weight than transportation system continuity, public access, and infrastructure functionality. In doing so, Alternative C provides a valuable analytical benchmark against which the other alternatives may be compared. It demonstrates how progressively greater transportation restrictions influence environmental conditions while simultaneously revealing the corresponding effects on recreation, administration, emergency response, local communities, and the Bureau's responsibility to manage the Dinosaur North TMA in alignment with the congressional multiple-use mandate.



From a conservation perspective, Alternative C offers several notable strengths. The alternative would likely reduce the extent of motorized travel occurring within certain sensitive habitats, decrease opportunities for localized soil disturbance along selected transportation corridors, simplify long-term maintenance obligations for portions of the transportation network, and reduce the number of locations requiring ongoing monitoring and administrative oversight. In areas where routes present well-documented, unavoidable resource conflicts that cannot reasonably be addressed through engineering improvements, seasonal management, restoration, or other mitigation measures, Alternative C demonstrates the Bureau's willingness to prioritize long-term resource protection over continued public access. UPLA acknowledges that such decisions may be appropriate in limited circumstances where supported by substantial evidence within the administrative record.

However, Alternative C also illustrates the practical limitations of evaluating transportation planning primarily through the lens of infrastructure reduction.

As discussed throughout this comment letter, roads and trails are not merely recreational amenities. They are components of a comprehensive public land transportation system supporting a broad spectrum of congressionally authorized public uses. Consequently, the effects of reducing transportation infrastructure extend well beyond the routes themselves. Every route closure influences transportation connectivity, emergency response capability, wildfire suppression access, administrative efficiency, visitor circulation, maintenance logistics, dispersed recreation opportunities, scientific monitoring, grazing administration, and local economic activity. The cumulative effects of numerous individual route closures therefore cannot be fully understood without evaluating how the transportation network functions as an integrated system.

From this legally and administratively necessary planning perspective, Alternative C substantially reduces network resilience.

Transportation engineering has long recognized that resilient networks derive strength not only from efficiency but also from connectivity and redundancy. Multiple route options distribute visitor use across larger landscapes, reduce congestion, improve emergency access, provide alternatives during flooding or wildfire, facilitate maintenance operations, and enable managers to implement temporary closures without significantly impairing overall system functionality. As transportation infrastructure becomes increasingly fragmented, these operational advantages progressively diminish. Recreational use becomes concentrated along fewer corridors, administrative flexibility declines, emergency response options become more limited, and routine maintenance activities require larger operational disruptions because fewer alternative routes remain available.



Alternative C also presents greater potential for unintended secondary effects resulting from displacement of recreational use. Motorized recreation demand does not disappear simply because transportation opportunities are reduced. Rather, recreation redistributes across the remaining designated transportation system. This redistribution will increase traffic volumes on retained routes, intensify use at popular trailheads and dispersed camping areas, elevate maintenance requirements, increase user conflicts, and concentrate environmental impacts within fewer portions of the planning area. While Alternative C successfully reduces the geographic extent of designated transportation infrastructure, it simultaneously increases the intensity of use occurring along the routes that remain available.

Similarly, Alternative C affords comparatively less administrative flexibility for responding to future environmental conditions. Ecological systems remain inherently dynamic. Wildfire, invasive species, climatic variability, vegetation succession, hydrologic changes, infrastructure improvements, and evolving scientific understanding continually influence public land management. A transportation system that has undergone substantial permanent reduction will provide fewer opportunities for adaptive management because future adjustments require reestablishing infrastructure that has already been eliminated. Conversely, maintaining sustainable transportation infrastructure while actively monitoring resource conditions preserves considerably greater management flexibility over time.

UPLA also notes that Alternative C appears to rely more heavily upon permanent transportation reductions than upon active management techniques capable of achieving similar conservation objectives while preserving transportation functionality. Engineering improvements, drainage stabilization, route relocation, seasonal restrictions, restoration, signing, visitor education, volunteer maintenance partnerships, targeted enforcement, and ongoing monitoring all represent well-established management tools that frequently allow agencies to resolve localized resource concerns without permanently eliminating transportation infrastructure. Although Alternative C undoubtedly incorporates many of these measures, the overall management philosophy remains strongly rooted in infrastructure reduction with severely limited adaptive stewardship.

Perhaps most importantly, Alternative C moves furthest from the balanced stewardship philosophy Congress established through FLPMA. Congress did not direct the Bureau to maximize environmental protection independent of all other public values, nor did it authorize recreation to supersede conservation. Instead, FLPMA requires agencies to balance multiple legitimate public interests while preventing unnecessary or undue degradation. UPLA calls attention to the fact that Alternative C shifts this balance significantly further toward preservation than Congress intended for lands managed under the multiple-use mandate.



For these reasons, while UPLA respects the conservation objectives reflected throughout Alternative C, it does not represent the most appropriate long-term transportation strategy for the Dinosaur North planning area. Its emphasis upon permanent infrastructure reduction, reduced network resilience, diminished administrative flexibility, and greater recreational displacement collectively outweigh the incremental conservation benefits that may be achieved through the expansive route closures proposed under this alternative. More balanced approaches are available that maintain robust resource protection while preserving the transportation infrastructure necessary to support the Bureau's diverse statutory responsibilities.

Alternative D

Among the alternatives proposed in the Draft EA, Alternative D most effectively embodies the integrated planning philosophy discussed throughout this comment letter. Rather than approaching travel management narrowly as an exercise in either reducing transportation infrastructure or preserving existing access, Alternative D reflects a more balanced effort to integrate resource conservation, transportation functionality, administrative practicality, and public recreation into a cohesive long-term management strategy. We therefore believe Alternative D provides the strongest foundation upon which to develop the Final TMP.

One of Alternative D's greatest strengths is its recognition that transportation systems constitute essential public land infrastructure rather than isolated recreational amenities. The alternative retains a transportation network that continues supporting emergency response, wildfire suppression, administrative access, grazing operations, scientific research, dispersed camping, hunting, tourism, volunteer stewardship, and sustainable motorized recreation while simultaneously addressing many of the resource concerns identified throughout the planning process. This broader systems perspective more closely reflects the practical realities of multiple-use land management than alternatives emphasizing extensive infrastructure reduction.

Alternative D also demonstrates a more comprehensive appreciation for transportation network functionality. As discussed previously, transportation systems should be evaluated according to their overall performance rather than simply the number of routes retained. Connectivity, circulation, redundancy, visitor distribution, maintenance efficiency, emergency access, and recreational quality collectively determine whether a transportation system functions effectively over the long term. Alternative D generally preserves these characteristics while incorporating targeted refinements intended to improve environmental performance across the planning area.



Equally important, Alternative D relies more heavily upon active management than passive restriction. The alternative recognizes that sustainable transportation infrastructure can coexist with resource conservation when supported by appropriate maintenance, monitoring, restoration, engineering improvements, visitor education, enforcement, and adaptive management. This philosophy is entirely consistent with contemporary recreation ecology, transportation planning, and landscape stewardship, all of which increasingly emphasize active management over wholesale infrastructure removal.

UPLA further appreciates that Alternative D maintains greater flexibility for future management than alternatives A, B, and C. Public land stewardship necessarily evolves as ecological conditions change, scientific understanding improves, and monitoring reveals the effectiveness of management actions. By preserving a more functional transportation network, Alternative D allows the Bureau to adapt future management in response to observed conditions rather than foreclosing future options through unnecessary permanent closures. This flexibility enhances the long-term resilience of both the transportation system and the Bureau's overall management program.

Alternative D is likewise better aligned with FLPMA's multiple-use mandate. Congress directed the Bureau to balance numerous legitimate public values... not simply recreation and conservation, but also watershed protection, wildlife habitat, cultural resources, administrative access, grazing, scientific research, public safety, and economic sustainability. Alternative D most consistently reflects this integrated management philosophy by recognizing that responsible transportation infrastructure often advances many of these objectives simultaneously. Properly designated roads and trails facilitate stewardship rather than impede it.

This alternative also better supports gateway communities and the local economies that depend upon continued access to federally managed public lands. Outdoor recreation contributes substantially to rural economies through tourism, equipment sales, lodging, fuel purchases, restaurants, guide services, vehicle maintenance, and numerous other businesses supported by public land visitation. Maintaining a well-designed transportation network preserves these socioeconomic benefits while continuing to protect the natural resources that attract visitors in the first place. Long-term conservation and sustainable recreation therefore reinforce rather than undermine one another.

Importantly, UPLA's support for Alternative D should not be interpreted as suggesting that every proposed route designation within the alternative is fully supported by the administrative record. Like any comprehensive planning alternative developed across a landscape of this scale and



complexity, Alternative D necessarily reflects broad planning judgments that benefit from further refinement as the Bureau evaluates public comments and prepares the Final EA.

Indeed, one of Alternative D's greatest strengths is that it already provides a sound planning framework capable of accommodating thoughtful refinement without altering its fundamental management philosophy. The Bureau need not choose between adopting Alternative D exactly as proposed or abandoning it entirely. Instead, the Final TMP can preserve Alternative D's integrated approach while making targeted adjustments that further improve transportation functionality, strengthen resource protection, enhance administrative flexibility, and better align individual route decisions with the evidence contained within the administrative record.

For this reason, UPLA supports **Modified Alternative D** rather than Alternative D exactly as presented.

Why Modified Alternative D Best Implements FLPMA

Throughout this comment letter, we have emphasized that effective travel management is not achieved by maximizing transportation infrastructure nor by maximizing transportation restrictions. Rather, successful travel management results from balancing sustainable public access with responsible resource stewardship through evidence-based, adaptive, and transparent decision-making. Modified Alternative D best accomplishes this objective because it preserves the considerable strengths of Alternative D while addressing its principal limitations through targeted refinement rather than wholesale revision.

At its core, Modified Alternative D recognizes that **active stewardship is preferable to permanent restriction whenever the Bureau's conservation objectives can reasonably be achieved through less restrictive management approaches**. This principle flows directly from FLPMA's multiple-use mandate. Congress directed the Bureau to prevent unnecessary or undue degradation while simultaneously managing public lands for diverse and sometimes competing public uses. The statute therefore encourages management solutions that accommodate authorized uses wherever they can be sustained responsibly through sound stewardship.

Accordingly, we recommend that the Bureau retain Alternative D as the preferred management framework while incorporating several overarching refinements throughout the Final Travel Management Plan.

First, **route retention should remain the preferred management outcome wherever the administrative record does not demonstrate that permanent closure represents the only**



reasonable means of protecting identified resources. Where localized impacts are documented, the Bureau must first evaluate engineering improvements, route hardening, drainage stabilization, reroutes, seasonal management, visitor education, enhanced signing, volunteer maintenance partnerships, restoration, enforcement, or other mitigation measures before permanently removing transportation infrastructure from the designated system. Permanent closures remain appropriate where evidence demonstrates that these measures would be ineffective; however, closures should represent the culmination of the analytical process rather than its starting assumption.

Second, **transportation connectivity should be recognized as an independent resource value.** The designated transportation system functions as public infrastructure supporting recreation, wildfire suppression, emergency response, grazing administration, scientific research, cultural resource management, dispersed camping, and countless other authorized activities. Maintaining connectivity, redundancy, and circulation therefore advances multiple public interests beyond recreation alone. Route-specific decisions should explicitly consider these transportation functions alongside environmental resource considerations.

Third, **adaptive management should become a central implementation strategy throughout the Final TMP.** Monitoring protocols, measurable performance indicators, periodic route evaluations, collaborative stewardship partnerships, and clearly defined adaptive management triggers will allow the Bureau to refine transportation management as new information becomes available. Such an approach acknowledges the dynamic nature of ecological systems while preserving flexibility for future decision-makers.

Fourth, **greater reliance should be placed upon collaborative stewardship.** Organizations such as UPLA and its member clubs have demonstrated longstanding commitments to route maintenance, habitat restoration, signing, visitor education, resource monitoring, and responsible recreation ethics. Continued collaboration between the Bureau and organized volunteer groups provides opportunities to improve transportation sustainability while reducing administrative costs and strengthening public stewardship of federal lands.

Finally, **route-specific management decisions should remain closely tied to the evidence contained within the administrative record.** Throughout the route analyses we have provided, UPLA identifies numerous locations where the available evidence supports route retention, modified management, or targeted mitigation in lieu of permanent closure. These recommendations do not challenge the overall structure of Alternative D; rather, they refine it by ensuring that individual transportation decisions remain proportional to documented resource conditions and consistent with the Bureau's broader planning objectives.



Collectively, these refinements transform Alternative D from simply a transportation alternative into a comprehensive systems-based management strategy fully aligned with the principles discussed throughout this comment letter. Modified Alternative D preserves transportation network resilience, strengthens conservation through active stewardship, maintains flexibility for future adaptive management, supports rural communities and recreational access, and more faithfully implements Congress's multiple-use direction under FLPMA.

For these reasons, UPLA concludes that **Modified Alternative D represents the alternative that best satisfies both the procedural objectives of NEPA and the substantive stewardship responsibilities imposed upon the Bureau by FLPMA.** It neither sacrifices conservation in favor of unrestricted access nor elevates preservation at the expense of Congress's multiple-use mandate. Instead, it reflects a mature, scientifically informed, and forward-looking transportation strategy capable of sustaining both the remarkable natural resources and the exceptional recreational opportunities that define the Dinosaur North planning area for generations to come.

RECREATION ACCESS, CONNECTIVITY, AND SUSTAINABLE ROUTE NETWORK DESIGN

The Dinosaur North TMP is fundamentally a transportation planning effort rather than a recreation planning effort. Nevertheless, the transportation system evaluated in this EA functions as the primary means through which nearly every dispersed recreational opportunity within the planning area is accessed. Consequently, decisions regarding route designation necessarily become decisions regarding the practical availability, quality, distribution, and sustainability of recreation across approximately 223,600 acres of BLM-managed public lands.

The Bureau appropriately identifies recreation as one of the nine principal issues requiring detailed environmental analysis, recognizing that the alternatives affect not only motorized recreation, but also non-motorized recreation, dispersed recreation sites, recreation management within the Browns Park SRMA, and visitor experiences along the Green River. The scope of this issue statement reflects Congress's multiple-use direction under FLPMA by acknowledging that travel management influences numerous recreational experiences simultaneously rather than serving only one user group.

UPLA supports this comprehensive perspective. However, the Draft EA would benefit from a more robust discussion of transportation network functionality as an independent planning consideration. While the EA carefully compares route mileage among alternatives, it places comparatively less emphasis on how individual routes collectively function as an interconnected



recreation system supporting visitor circulation, dispersed use distribution, emergency access, and long-term stewardship.

Recreation Access Is a Statutory Component of Multiple-Use Management

FLPMA declares that the public lands shall be managed on the basis of multiple use and sustained yield (43 U.S.C. §§ 1701(a)(7), 1732(a)). Recreation is not merely compatible with that mandate; it is expressly identified by Congress as one of the principal public uses of federal lands. Likewise, the Vernal Field Office Resource Management Plan directs the Bureau to provide areas for OHV and other motorized recreation while protecting other resource values and to establish partnerships that facilitate successful trail systems and OHV program development. The Dinosaur North TMP was expressly developed to implement these RMP objectives.

The RMP also contains an equally important planning principle that deserves greater emphasis throughout the EA. Travel-related decision **TRC-12 provides that routes causing resource damage should first be repaired, upgraded, or realigned, with closure contemplated only when those measures are not economically feasible.** This hierarchy reflects an adaptive management philosophy that favors infrastructure improvement before infrastructure elimination.

This principle should guide interpretation of every route-specific recommendation contained within the Final TMP.

The Dinosaur North Transportation System Functions as an Integrated Recreation Network

The Draft EA correctly notes that most of the 1,112 inventoried routes provide access to recreation opportunities. More importantly, it documents that:

- 339 routes provide access to recreation destinations;
- 27 routes provide access to the Green River;
- 65 routes provide access to recreation destinations within the Browns Park SRMA; and
- approximately 53–54 miles of routes occur within the Browns Park SRMA itself.

These figures demonstrate that the transportation system should not be evaluated as a collection of independent route segments. Instead, it functions as an integrated network supporting diverse recreation opportunities throughout the planning area, including:

- dispersed camping;
- OHV touring;



- four-wheel drive recreation;
- hunting access;
- fishing access;
- boating access along the Green River;
- wildlife viewing;
- photography;
- scenic touring;
- access to Dinosaur National Monument;
- access to Flaming Gorge National Recreation Area;
- access to Ashley National Forest;
- access to the Browns Park Fish and Wildlife Refuge;
- access to the Jones Hole Fish Hatchery; and
- numerous recreation opportunities occurring across adjacent federal and state lands.

Transportation planners have long recognized that network performance depends upon connectivity rather than individual segment performance. FHWA transportation planning literature consistently emphasizes that connected networks distribute traffic, increase redundancy, improve emergency response, reduce congestion, and provide resilience during temporary disruptions (FHWA, 2021). Similar principles increasingly guide recreation transportation planning throughout federal public land management.

These concepts are particularly applicable within Dinosaur North because recreational travel rarely consists of visiting a single destination via a single road. Rather, visitors typically travel interconnected route systems linking highways, county roads, primitive routes, dispersed campsites, trailheads, river access locations, scenic overlooks, and adjacent public lands into complete recreational experiences.

Connectivity Is an Environmental Resource

Connectivity is often discussed within wildlife biology. It is equally important from a transportation planning perspective. A connected transportation network provides several measurable public benefits:

- distributes recreational use across larger landscapes rather than concentrating visitation;
- reduces congestion at popular destinations;
- provides alternate travel options during flooding, wildfire, maintenance, or seasonal restrictions;
- improves emergency response and search-and-rescue capability;



- allows resource managers to implement localized temporary closures without substantially degrading overall recreation access;
- reduces incentives for unauthorized route creation when designated alternatives remain available; and
- increases overall system resilience.

The Draft EA partially acknowledges these concepts by recognizing that the most heavily used access routes and primary recreation access corridors remain open under every alternative and by emphasizing implementation measures such as education, signing, monitoring, maintenance, and enforcement. However, **the EA stops short of evaluating connectivity itself as a transportation resource worthy of protection.**

We recommend that the Final EA explicitly recognize network connectivity as an independent planning value because transportation infrastructure performs functions extending well beyond the individual route upon which recreation occurs.

Alternative Comparison Through a Network Planning Lens

Viewed solely through route mileage, the four alternatives differ substantially.

- Alternative A retains 279 miles of designated public OHV routes while treating 421 miles of inventoried routes as closed because they were never formally designated under the 2008 TMP.
- Alternative B retains only a modest increase in open mileage while prioritizing conservation through substantially greater closure of inventoried routes, leaving 57 percent of the inventoried network unavailable for public motorized travel.
- Alternative C represents a dramatic shift toward integrated access by retaining 637 miles, roughly 91% of the inventoried network, while closing only about 56 miles.
- Alternative D retains nearly the entire inventoried transportation system, designating approximately 694–696 miles open and leaving only a very small portion closed.

These numerical differences are significant not simply because of route mileage, but because they fundamentally alter the structure and performance of the recreation transportation system.

Alternative B creates a comparatively sparse network requiring greater reliance upon fewer transportation corridors. Recreation becomes concentrated, routing options diminish, and management flexibility decreases.



Alternative C substantially restores network functionality while continuing to exclude selected routes where resource concerns remain.

Alternative D provides the greatest transportation resilience by preserving redundancy throughout nearly the entire inventoried network.

We emphasize that this progression illustrates why a Modified Alternative D provides the strongest planning framework. Rather than evaluating routes independently, a Modified Alternative D preserves the integrity of the transportation system while allowing targeted, evidence-based modifications where localized resource conflicts genuinely warrant additional management.

Recreation Distribution Is a Conservation Tool

An important concept receiving limited attention within the Draft EA is visitor distribution. Recreation ecology literature consistently demonstrates that concentrating recreation onto fewer facilities does not reduce cumulative environmental effects. Instead, concentrated visitation often increases soil compaction, campsite expansion, parking conflicts, vegetation loss, user conflicts, and maintenance demands at the locations that remain available (Marion & Leung, 2011; Monz et al., 2013).

Conversely, appropriately designed transportation systems distribute use across larger landscapes, reducing localized intensity while preserving opportunities for solitude and diverse recreational experiences.

This principle is particularly relevant to Browns Park SRMA.

The EA documents substantial differences among the alternatives regarding recreation destination access within the SRMA, access routes to the Green River, and total route mileage remaining available inside the SRMA. Figures 3-2 through 3-4 illustrate that Alternatives C and D preserve substantially greater access to recreation destinations and Green River access points than Alternatives A and B. Maintaining these access opportunities is not merely a recreational benefit. It also distributes visitors across multiple river access points, dispersed campsites, trailheads, and scenic destinations rather than concentrating use into fewer locations.

Sustainable Route Networks Reduce Unauthorized Travel



The Bureau appropriately identifies implementation challenges associated with the 2008 TMP, noting that confusion regarding designated routes contributed to unauthorized travel, user conflicts, and resource degradation. We agree that these implementation failures warrant corrective action. However, unauthorized route proliferation is not solved solely through additional closures.

The recently adopted Greater Sage-Grouse Plan Amendment similarly recognizes that sustainable transportation systems may require improving existing routes, closing selected routes, or creating new connections to reduce pioneering of unauthorized travel while continuing to meet access needs. This policy direction closely aligns with contemporary transportation planning. Users are significantly more likely to remain on designated routes when those routes provide logical connectivity, reach intended destinations, are clearly signed, and function as complete transportation systems. Fragmented networks with unnecessary dead ends, missing connectors, or impractical access limitations can inadvertently encourage users to seek alternative travel paths outside the designated system.

Thus, sustainable transportation design itself functions as a preventative conservation measure.

Recreation Infrastructure Extends Beyond Roads

Transportation planning should also recognize that roads constitute only one component of the broader recreation system. Throughout Dinosaur North, the designated network supports:

- dispersed camping authorized under the RMP's 300-foot camping provision;
- river put-ins and take-outs;
- developed campgrounds;
- historic sites such as John Jarvie;
- wildlife viewing;
- boating recreation;
- fishing;
- hunting;
- photography;
- trail-based OHV recreation;
- scenic touring; and
- access to adjacent federal recreation units.

Each depends upon transportation infrastructure functioning as an integrated system. Consequently, route designations should evaluate not merely whether a destination technically



remains accessible, but whether access remains practical, connected, efficient, and consistent with expected recreational use.

UPLA's Recommended Modified Alternative D

We therefore recommend that the Final TMP adopt Modified Alternative D while incorporating several planning refinements.

First, transportation connectivity should be treated as a legitimate planning objective alongside wildlife, soils, hydrology, and visual resources.

Second, route-specific decisions should evaluate whether removal of individual segments degrades overall network performance, recreational circulation, emergency access, or visitor distribution.

Third, connector routes serving multiple recreation destinations... including access to Green River recreation, Browns Park SRMA facilities, dispersed camping areas, adjacent public lands, and established recreation corridors... should receive heightened consideration because their transportation value exceeds their individual mileage.

Finally, implementation should emphasize the measures already identified within Appendix F (education, signing, maintenance, monitoring, enforcement, and adaptive management) before permanent closures are employed as the primary means of addressing localized resource concerns. This approach is consistent with the adaptive management philosophy embedded within the Vernal RMP, the Dinosaur North Implementation Guide, and current BLM travel management policy.

Viewed through the lens of contemporary transportation planning, the central question before the Bureau is not how many miles should remain open, but whether the selected alternative produces a transportation network that remains connected, understandable, resilient, administratively manageable, environmentally sustainable, and capable of supporting the full spectrum of recreation opportunities Congress intended to remain available on public lands under FLPMA. A Modified Alternative D, refined through route-specific adjustments and adaptive management rather than broad infrastructure reduction, best fulfills those objectives while preserving the long-term integrity of both the transportation system and the remarkable recreational landscapes of the Dinosaur North TMA.



ECONOMIC IMPORTANCE OF MOTORIZED RECREATION

Recreation Is an Economic Resource That Congress Intended Public Lands to Produce

The economic contributions generated by outdoor recreation are neither incidental nor secondary consequences of federal public land management. Rather, they are among the principal public benefits Congress intended the BLM to sustain through implementation of the Federal Land Policy and Management Act of 1976 (FLPMA). Congress expressly declared that public lands are to be managed under principles of multiple use and sustained yield, balancing recreation with the conservation of ecological, scenic, scientific, historical, watershed, and other public values (43 U.S.C. §§ 1701(a)(7), 1702(c), 1732(a)). Recreation therefore occupies a position equal in stature to the many other resource values that the Bureau must consider when making travel management decisions.

The Dinosaur North TMP should therefore not evaluate recreation solely as a user experience or discretionary public benefit. Recreation constitutes an important economic output of public lands themselves. The transportation system evaluated in this EA functions as the enabling infrastructure through which those economic benefits are realized. Decisions regarding route designation necessarily influence visitor access, visitor distribution, recreational participation, travel behavior, tourism expenditures, outfitting opportunities, local employment, tax revenues, and the long-term economic vitality of gateway communities throughout northeastern Utah. Consequently, the transportation network should be evaluated not only for its environmental effects, but also for its capacity to continue producing the public economic benefits that Congress anticipated when directing the BLM to manage public lands for multiple use.

The Draft EA recognizes recreation as one of only nine resource issues requiring detailed environmental analysis, asking specifically how the alternatives would affect recreation visitation, motorized recreation access, dispersed recreation opportunities, recreation management within the Browns Park Special Recreation Management Area (SRMA), visitor experiences along the Green River, and access to dispersed recreation sites. These questions appropriately acknowledge that travel management decisions influence substantially more than vehicle movement; they influence the broader recreational economy that depends upon access to these public landscapes.

We agree with this analytical framework but call attention to the fact that the Draft EA requires from a substantially more robust examination of recreation economics as an integral component of multiple-use management rather than as a secondary socioeconomic consideration.



Outdoor Recreation Represents One of America's Largest Economic Sectors

Over the past decade, outdoor recreation has become one of the nation's largest and fastest-growing economic sectors. According to the Bureau of Economic Analysis (BEA), outdoor recreation generated approximately **\$1.2 trillion in gross economic output**, contributed approximately **2.3 percent of national Gross Domestic Product**, supported over **five million American jobs**, and generated hundreds of billions of dollars in labor income (Bureau of Economic Analysis [BEA], 2024). Motorized recreation (including off-highway vehicles, four-wheel-drive recreation, overlanding, snowmobiling, and related activities) constitutes a substantial component of this national recreation economy.

Unlike many forms of tourism that rely primarily upon developed infrastructure, motorized recreation depends fundamentally upon publicly managed transportation systems. Roads, primitive routes, trail networks, staging areas, dispersed camping opportunities, and destination access collectively function as the infrastructure supporting this economic sector. Consequently, travel management decisions directly influence the productive capacity of outdoor recreation economies in much the same manner that transportation infrastructure affects commercial freight movement or urban economic development.

This relationship is particularly relevant within the Dinosaur North TMA, where recreation is predominantly dispersed across an expansive landscape of over 223,000 acres of BLM-managed public lands extending between the Wyoming and Colorado state lines and encompassing the Browns Park SRMA, portions of the John Wesley Powell National Conservation Area, and extensive backcountry landscapes. The transportation network connecting these destinations therefore functions as a form of public economic infrastructure whose value extends well beyond the physical road prism.

The Recreation Economy of Northeastern Utah Depends Upon Public Land Access

Unlike metropolitan recreation economies that benefit from diversified tourism infrastructure, the communities surrounding the Dinosaur North TMA derive a substantial portion of their tourism economy directly from access to federally managed public lands. Communities including Vernal, Manila, Dutch John, Jensen, and smaller communities throughout Daggett and Uintah Counties provide lodging, restaurants, fuel, equipment sales, repairs, guide services, grocery stores, camp supplies, vehicle maintenance, and numerous other services that exist because visitors travel to nearby public lands.



Visitors using the Dinosaur North transportation system seldom participate in only one recreational activity. A typical visitor itinerary frequently includes several complementary experiences:

- Four-wheel-drive exploration;
- OHV touring;
- dispersed camping;
- boating or fishing on the Green River;
- hunting;
- wildlife photography;
- access to Dinosaur National Monument;
- access to Flaming Gorge National Recreation Area;
- scenic touring;
- historic sites;
- and recreational travel connecting multiple public land units.

The economic value of these trips therefore cannot reasonably be assigned to one destination or one route. Rather, **the transportation network itself facilitates the integrated recreation experience that produces visitor expenditures throughout the region.** This systems-based understanding of recreation economics is consistent with contemporary tourism literature, which recognizes transportation accessibility as one of the strongest predictors of visitor participation, trip duration, and local economic expenditures (Stynes, 2011; Outdoor Recreation Roundtable, 2023).

Browns Park Special Recreation Management Area Illustrates the Economic Function of Transportation Infrastructure

Perhaps nowhere within the planning area is this relationship more apparent than the Browns Park SRMA. The Draft EA identifies Browns Park as a primary recreation destination and specifically evaluates how each alternative affects:

- access to recreation destinations within the SRMA;
- access to the Green River;
- route mileage within the SRMA;
- and overall recreation visitation.

These are not merely recreational metrics. Each access corridor represents an economic pathway supporting anglers, boaters, hunters, campers, photographers, wildlife viewers, commercial outfitters, educational programs, and family recreation. Every reduction in practical accessibility influences visitor behavior. While not every route closure results in measurable economic loss, cumulative reductions in network connectivity alter destination choice, shorten visitor stays,



reduce overnight visitation, and shift recreation expenditures toward competing destinations offering more accessible transportation systems.

Importantly, Browns Park functions as a landscape rather than a single destination. Visitors routinely travel between multiple river access points, dispersed campsites, historic resources, scenic overlooks, wildlife habitats, and adjacent public lands. Consequently, transportation network connectivity directly influences the quality and duration of recreational experiences throughout the SRMA. This illustrates an important planning principle often underemphasized within travel management analyses: **transportation infrastructure itself is a recreational asset.**

Roads and Trails Are Economic Infrastructure

Transportation economists have long recognized that infrastructure creates economic productivity by reducing barriers between people and destinations. This principle applies equally to federal recreation transportation systems. Within Dinosaur North, roads and designated routes provide access to hundreds of miles of dispersed recreational landscapes that otherwise would remain functionally unavailable to many members of the public. These routes enable participation by families, elderly visitors, individuals with disabilities, hunters transporting harvested game by lawful means, anglers carrying equipment, photographers transporting specialized gear, researchers, volunteers conducting stewardship projects, and numerous other authorized users.

The Draft EA appropriately notes that the most heavily used primary access routes remain open under every alternative while implementation measures including signing, maintenance, monitoring, education, and enforcement would accompany all action alternatives. We strongly supports these implementation measures because they increase the long-term productivity of the transportation system without unnecessarily reducing access.

The relationship between transportation infrastructure and recreation economics also explains why Alternative D represents a substantially different management philosophy than Alternatives A and B. Alternative A would retain only 279 miles of designated public routes while treating 421 miles of inventoried routes as unavailable for public motorized access. Alternative B provides only a modest increase in accessible mileage while continuing to close nearly 57% of the inventoried transportation network. In contrast, Alternative C would designate 637 miles as open, while Alternative D would retain 694 miles of the inventoried transportation system for public use.



Although these differences are often described numerically, their practical significance lies in network functionality. A transportation network comprising 280 miles of public routes provides substantially fewer recreational choices, fewer connected travel opportunities, fewer dispersed camping options, fewer alternate travel corridors, and fewer opportunities for visitors to combine multiple recreational destinations within a single trip than a network approaching 700 miles. The resulting differences in visitor behavior inevitably influence local economic activity.

Recreation Participation Produces Conservation Benefits

Modern recreation economics increasingly recognizes that recreation expenditures generate secondary public benefits extending beyond local business activity. Visitors purchasing OHVs, four-wheel-drive vehicles, trailers, camping equipment, fuel, navigation equipment, safety equipment, lodging, permits, and guide services also support conservation through excise taxes, fuel taxes, volunteer organizations, and cooperative stewardship programs.

The motorized recreation community has become one of the largest volunteer contributors to trail maintenance, invasive species control, erosion mitigation, route signing, fencing projects, restoration activities, visitor education, and public land stewardship across the western United States. Organizations such as Utah Public Lands Alliance, Tread Lightly!, BlueRibbon Coalition, local four-wheel-drive clubs, OHV associations, and numerous county partnerships contribute thousands of volunteer hours annually toward maintaining the very transportation infrastructure evaluated within travel management planning. These contributions possess measurable economic value. Independent analyses of volunteer stewardship consistently estimate that public agencies receive millions of dollars in annual labor value through recreation-based volunteer programs (Independent Sector, 2024). By reducing deferred maintenance and supplementing agency capacity, recreation organizations effectively expand the Bureau's ability to manage transportation systems despite constrained federal budgets.

For this reason, travel management planning should recognize recreation organizations not merely as user groups, but as long-term infrastructure partners whose continued engagement depends upon maintaining meaningful recreational opportunities on public lands.

NEPA's Treatment of Recreation Economics and the Adequacy of the Draft EA's Socioeconomic Analysis

Although NEPA is fundamentally a procedural statute, its procedural requirements exist to ensure that federal agencies make informed decisions by considering all reasonably foreseeable environmental consequences of a proposed action before making an irreversible commitment of



resources (42 U.S.C. §§ 4321-4370m-12). Importantly, the term "human environment" extends beyond biophysical resources to encompass the social, economic, recreational, and cultural systems that interact with the natural environment. While economic effects alone do not ordinarily dictate the scope of environmental review, economic impacts that are interrelated with changes in the physical environment constitute an appropriate and often necessary component of a comprehensive NEPA analysis (*Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 1989).

Travel management planning exemplifies this relationship. The designation or closure of transportation infrastructure directly alters the physical accessibility of public lands. Changes in physical accessibility, in turn, influence recreation participation, visitor distribution, travel behavior, tourism expenditures, and local economic activity. Consequently, **recreation economics is not merely an indirect socioeconomic consideration appended to the environmental analysis; rather, it represents a foreseeable consequence of the transportation decisions under consideration.**

The Draft EA appropriately recognizes recreation visitation and recreation management as issues requiring detailed analysis and includes a socioeconomic discussion within Appendix B. Table B-9 estimates recreation-related economic effects for Fiscal Year 2025, while Table B-10 estimates economic effects per 10,000 visitor-days. While these estimates provide a useful baseline, they severely simplify the complex economic relationships that exist between transportation networks and recreation behavior.

Specifically, the analysis assumes relatively static visitation levels across alternatives, despite substantial differences in the size and functionality of the designated transportation networks. For example, Alternative A retains 279 miles of OHV-open routes, Alternative B 285 miles, Alternative C 637 miles, and Alternative D 694 miles. These differences are not trivial variations in route inventory; they represent fundamentally different recreation systems with markedly different capacities to accommodate dispersed recreation, route redundancy, destination connectivity, and visitor choice. Recreation demand research consistently demonstrates that accessibility influences participation. Recreationists evaluate destinations based upon travel opportunities, diversity of experiences, route connectivity, scenic quality, convenience, perceived freedom of movement, and availability of alternate routes (Cordell, 2012; Manning, 2011; USDA Forest Service, 2016). Transportation systems that preserve extensive opportunities for exploration attract more repeat visitation and longer visitor stays than fragmented systems that concentrate travel into fewer corridors. Consequently, the assumption that substantially different transportation networks would generate relatively similar recreation demand should be supported by additional explanation or sensitivity analysis.



Likewise, the Draft EA would benefit from greater discussion of induced economic effects. Direct visitor expenditures support hotels, campgrounds, restaurants, grocery stores, fuel stations, vehicle repair facilities, equipment retailers, outfitters, guide services, and numerous secondary industries throughout Uintah and Daggett Counties. These expenditures circulate through local economies, supporting employment, wages, local tax revenues, and private investment (BEA, 2024; Outdoor Recreation Roundtable [ORR], 2023). The cumulative effect of incremental reductions in recreation participation may therefore exceed the immediate changes in visitor spending estimated through simplified visitation models.

UPLA does not contend that every route closure necessarily produces measurable economic harm. Rather, we submit that transportation network design influences recreation demand in ways that extend beyond individual route closures. Evaluating transportation systems as integrated networks rather than collections of isolated route segments is necessary to strengthen the socioeconomic analysis and improve the Bureau's understanding of the long-term relationship between transportation infrastructure and regional recreation economies.

Another important consideration concerns recreation substitution. The Draft EA implicitly assumes that visitors unable to access one portion of the Dinosaur North TMA will simply recreate elsewhere within the planning area. Recreation economics literature demonstrates that this assumption is only partially valid. Some visitors substitute destinations, some substitute activities, while others forego trips entirely (Loomis & Walsh, 1997). Visitors traveling specifically to experience extensive four-wheel-drive opportunities, dispersed route exploration, or connected backcountry touring may instead choose competing recreation destinations elsewhere in Utah, Colorado, Wyoming, Idaho, Nevada, or Arizona if the desired transportation experience is substantially diminished. From the perspective of northeastern Utah communities, such substitution represents a net economic loss rather than merely a redistribution of recreation.

Comparative Economic Implications of TMP Alternatives

The Draft EA appropriately emphasizes that each alternative reflects a different management philosophy rather than a simple numerical adjustment to route mileage. Viewed through an economic lens, however, these alternatives also represent different levels of public infrastructure investment and different capacities to support recreation-based economic activity.

Alternative A largely perpetuates implementation of the 2008 travel network, leaving 421 miles of inventoried routes unavailable for public motorized use because they were never formally designated. While this alternative preserves access to primary destinations, it substantially limits



route diversity, network redundancy, and opportunities for dispersed exploration. As the EA itself explains, implementation of the 2008 TMP has resulted in considerable public confusion because many existing routes were never formally evaluated or designated, contributing to unauthorized travel, user uncertainty, and management inefficiencies. From an economic perspective, Alternative A maintains the greatest degree of uncertainty while utilizing the smallest portion of the existing transportation infrastructure.

Alternative B retains only a modest increase in publicly accessible mileage while prioritizing reductions in routes affecting sensitive resources. The Bureau explains that this alternative emphasizes conservation by substantially reducing routes within BLM Natural Areas, Lands with Wilderness Characteristics, Wilderness Study Areas, riparian areas, and wildlife habitats. UPLA recognizes and appreciates the conservation objectives underlying Alternative B. Nevertheless, because Alternative B leaves 57% of the inventoried transportation network closed, it necessarily limits opportunities for route diversity, loop travel, destination connectivity, dispersed camping, and exploration-based recreation. These reductions may not eliminate visitation altogether, but they will alter visitor behavior by concentrating recreation into fewer corridors and reducing the variety of experiences available to repeat visitors.

Alternative C represents a significant shift toward balancing conservation with access by retaining 91% of the inventoried network while continuing to close routes identified as presenting greater resource concerns. Economically, Alternative C preserves substantially greater recreational opportunity than Alternatives A or B while still recognizing the need for targeted resource protection. The larger, more connected transportation system provides visitors with greater route diversity, improved circulation, expanded destination access, and enhanced opportunities for dispersed recreation throughout the planning area.

Alternative D provides the greatest level of public access by retaining nearly the entire inventoried transportation network. The Bureau explicitly states that the objective of Alternative D is to provide the highest level of motorized public access, including access to lands outside BLM jurisdiction. From a recreation economics perspective, this alternative most effectively preserves the productive capacity of the transportation system. Greater network connectivity allows visitors to create longer and more diverse itineraries linking the Browns Park SRMA, Green River access points, Dinosaur National Monument, Flaming Gorge National Recreation Area, Ashley National Forest, dispersed campsites, scenic overlooks, historic resources, and numerous secondary recreation destinations. This diversity encourages longer visitor stays, repeat visitation, and greater regional expenditures while reducing congestion through distribution of recreational use across a broader transportation network.



Importantly, Alternative D should not be viewed as maximizing recreation at the expense of conservation. Rather, it recognizes that transportation infrastructure itself can function as a conservation tool by concentrating motorized travel onto designated routes, reducing incentives for unauthorized route creation, facilitating monitoring and enforcement, improving visitor education, and supporting maintenance activities identified within Appendix F.

The Economic Rationale for a Modified Alternative D

We support a Modified Alternative D because it provides the strongest foundation for achieving both economic sustainability and long-term resource stewardship. Our recommendation is not based solely upon maximizing route mileage. Rather, it reflects understanding that well-designed transportation systems produce multiple public benefits simultaneously.

First, Modified Alternative D best preserves **network connectivity**. Recreation transportation systems derive much of their value from interconnected routes rather than isolated segments. Connector routes linking dispersed recreation destinations often possess disproportionate functional importance because they enable complete travel circuits, provide alternate access during temporary closures, and distribute visitation across larger landscapes. Transportation planning research consistently demonstrates that connected networks exhibit greater resilience, greater operational flexibility, and greater user satisfaction than fragmented systems (Federal Highway Administration [FHWA], 2021).

Second, Modified Alternative D best supports **adaptive management**. The Vernal Resource Management Plan expressly contemplates maintenance, upgrades, realignment, monitoring, and route-specific management before closure where economically feasible. Maintaining a broader transportation network preserves the Bureau's ability to respond to localized resource concerns through targeted management rather than relying upon permanent closures as the primary management tool. Such flexibility is particularly important given changing climatic conditions, evolving recreation demand, wildfire recovery, invasive species management, and ongoing scientific understanding of resource responses.

Third, Modified Alternative D maximizes the return on existing public investment. Approximately 700 miles of inventoried routes already exist within the planning area. These routes represent decades of public investment, administrative management, and recreational use. Where routes can be sustainably managed through maintenance, monitoring, education, seasonal restrictions, engineering improvements, or vehicle-specific designations, continued use often represents a more efficient allocation of public resources than permanent decommissioning followed by future restoration of displaced recreation elsewhere.



Fourth, Modified Alternative D strengthens collaborative stewardship. The Vernal RMP emphasizes partnerships with user groups in developing and maintaining successful trail systems. UPLA strongly supports this direction. Volunteer organizations contribute substantial labor, technical expertise, funding, equipment, route monitoring, public education, and stewardship activities that augment the Bureau's limited management capacity. Preserving meaningful recreation opportunities sustains the volunteer base that makes these partnerships possible.

Finally, Modified Alternative D most effectively balances the full spectrum of public values identified by FLPMA. Recreation, conservation, wildlife habitat, watershed protection, cultural resources, scenic quality, and local economic sustainability need not be treated as mutually exclusive objectives. Thoughtfully designed transportation systems frequently advance several of these values simultaneously by concentrating use onto designated routes while maintaining opportunities for responsible public access.

The Dinosaur North TMP represents far more than a designation of roads and trails. It establishes the transportation framework through which future generations will experience more than 223,000 acres of some of northeastern Utah's most distinctive public landscapes. Because transportation infrastructure functions as the physical mechanism connecting visitors to recreation opportunities, every route designation carries corresponding implications for recreation participation, tourism, volunteer stewardship, rural economic resilience, and the productive capacity of the public lands themselves.

Congress anticipated these interrelationships when enacting FLPMA. The multiple-use mandate does not require maximizing any single resource value; rather, it requires the Bureau to exercise informed judgment in balancing recreation, conservation, watershed protection, wildlife habitat, cultural resources, and other public benefits in a manner that serves the long-term public interest. Recreation is therefore not an incidental byproduct of federal land management but one of its intended outputs, producing measurable economic, social, educational, and stewardship benefits for surrounding communities and the nation as a whole.

We urge the BLM to address existing gaps in the Draft EA by recognizing transportation infrastructure as both a conservation asset and an economic asset. The analysis should fully evaluate how differences in network connectivity, route diversity, visitor distribution, and destination accessibility influence recreation demand and regional economic activity. Such an approach would more completely satisfy NEPA's objective of informed decision-making while remaining fully consistent with FLPMA's multiple-use mandate and the Vernal Resource



Management Plan's emphasis on sustainable transportation systems, adaptive management, and collaborative stewardship.

For the reasons discussed throughout this comment letter, UPLA concludes that a **Modified Alternative D** best fulfills these objectives. By preserving a highly connected transportation network while applying targeted, route-specific management where supported by the administrative record, Modified Alternative D provides the greatest opportunity to sustain recreation-based economic benefits, support gateway communities, encourage long-term volunteer stewardship, and maintain the broad range of public uses that Congress intended the BLM to facilitate and actively manage on public lands.

BEST AVAILABLE SCIENCE, RECREATION ECOLOGY, TRANSPORTATION NETWORK SCIENCE, AND SCIENTIFIC UNCERTAINTY

Resource Management Decisions Must Be Grounded in Best Available Science

NEPA does not compel federal agencies to select the alternative that produces the least environmental impact, nor does it require elimination of every conceivable environmental risk. Rather, NEPA requires agencies to make informed decisions based upon high-quality scientific information, reasoned analysis, and transparent consideration of competing public values before exercising administrative discretion (42 U.S.C. §§ 4321-4336h). The BLM's responsibility under FLPMA is similarly one of balanced stewardship, requiring management of the public lands for multiple use and sustained yield while preventing unnecessary or undue degradation (43 U.S.C. §§ 1701(a)(7), 1702(c), 1732(b)).

These statutory mandates necessarily require management decisions to be grounded in empirical evidence rather than precautionary assumptions, generalized ecological theories, or unsupported inferences regarding the effects of motorized recreation. As the Supreme Court has repeatedly recognized, NEPA is intended to ensure informed agency decision-making, not to dictate substantive outcomes or require agencies to eliminate all uncertainty before acting (*Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 1989; *Marsh v. Oregon Natural Resources Council*, 490 U.S. 360, 1989). Likewise, the Administrative Procedure Act prohibits agency actions that are arbitrary, capricious, constitute an abuse of discretion, or otherwise fail to articulate a rational connection between the facts found and the conclusions reached (5 U.S.C. § 706(2)(A); *Motor Vehicle Manufacturers Association v. State Farm Mutual Automobile Insurance Co.*, 463 U.S. 29, 1983).



Accordingly, the central scientific question before the Bureau is not whether motorized recreation is capable of affecting natural resources. Virtually every human use of public lands produces some measurable environmental effect. Rather, **the relevant inquiry is whether the administrative record demonstrates, through the best available scientific evidence, that specific routes proposed for closure are likely to produce resource impacts of sufficient magnitude, duration, and certainty to justify restricting one of FLPMA's expressly protected multiple uses.**

This distinction is critically important because recreation ecology has evolved substantially during the past three decades. Early public land planning often relied upon generalized assumptions that increasing road density or motorized use necessarily resulted in proportional increases in ecological degradation. Contemporary scientific literature paints a considerably more nuanced picture. Numerous studies now demonstrate that ecological response depends primarily upon site-specific conditions including route design, maintenance, topography, hydrology, soils, vegetation, visitor behavior, seasonal timing, intensity of use, and cumulative land management activities rather than merely the existence of a designated transportation route (Marion & Wimpey, 2017; Hammitt, Cole, & Monz, 2015).

The Draft EA appropriately recognizes that the Dinosaur North TMA encompasses a diverse landscape including riparian corridors, upland sagebrush communities, pinyon-juniper woodlands, backcountry terrain, and the Browns Park Special Recreation Management Area. These landscapes exhibit markedly different ecological sensitivities, disturbance regimes, and capacities for sustainable recreational use. Consequently, the scientific literature strongly supports route-specific analysis rather than generalized assumptions regarding motorized recreation across the planning area.

UPLA therefore urges the Bureau to achieve the legal and administrative rigor required in a statutorily compliant Final EA by emphasizing empirical, route-specific evidence as clear rationale for each decision to designate, open, limit, or close each route contained in this TMP. This is the only approach that will satisfy both NEPA's requirement for informed decision-making and FLPMA's multiple-use mandate than broad categorical assumptions regarding recreation impacts.

Recreation Ecology Demonstrates That Sustainable Recreation Depends Upon Management Rather Than Elimination

Modern recreation ecology has matured into a sophisticated scientific discipline examining how recreational activities interact with ecological systems under varying environmental conditions.



One of the discipline's most important findings is that ecological effects are rarely determined solely by the type of recreation occurring on a landscape. Instead, environmental outcomes are governed by management practices, infrastructure design, visitor behavior, site resilience, and adaptive maintenance. Marion and Wimpey (2017), among the leading researchers in recreation ecology and trail sustainability, conclude that properly designed and maintained recreation routes substantially reduce erosion, vegetation loss, sediment transport, and unauthorized trail proliferation even while accommodating substantial recreational use. Their research demonstrates that route alignment, drainage design, tread stabilization, maintenance frequency, and visitor education generally exert greater influence over long-term environmental performance than recreation volume alone.

This finding represents a significant evolution from earlier assumptions frequently embedded within travel management planning. Historically, many analyses implicitly equated fewer roads with reduced environmental impacts. While this may be purported to be intuitive, this assumption oversimplifies ecological processes and ignores the substantial body of contemporary literature demonstrating that well-managed transportation systems reduce environmental impacts by concentrating travel onto sustainable corridors while discouraging dispersed or unauthorized use (Leung & Marion, 1999; Marion & Wimpey, 2017).

The Draft EA itself reflects this modern understanding by recognizing that implementation measures (including signing, route maintenance, visitor education, monitoring, restoration, and enforcement) constitute essential components of every action alternative. These management actions acknowledge an important scientific reality: environmental outcomes are shaped not merely by transportation networks but by how those networks are managed over time. This principle is especially relevant within the Dinosaur North TMA because many inventoried routes have existed for decades and already represent established travel corridors. Existing routes generally exhibit stabilized disturbance footprints whose ecological effects differ substantially from creation of entirely new disturbances. Numerous ecological studies have demonstrated that the greatest environmental effects associated with transportation systems often occur during initial disturbance, after which many ecological processes stabilize, provided routes are properly maintained and unauthorized expansion is prevented (Forman et al., 2003).

Consequently, **the scientific literature does not support a presumption that continued management of an existing designated route necessarily produces greater environmental benefit through closure than through sustainable management.** Instead, outcomes depend upon route-specific characteristics, existing conditions, maintenance practices, visitor compliance, and the feasibility of targeted mitigation measures.



Transportation Networks Function as Ecological Management Infrastructure

Transportation science increasingly recognizes road systems as integrated networks rather than independent linear features. This systems perspective has important implications for travel management because the ecological performance of a transportation network depends not only upon individual routes but upon the overall organization and connectivity of the system. The Draft EA recognizes 1,112 inventoried routes totaling nearly 700 miles across the planning area and explains that implementation difficulties associated with the 2008 TMP have resulted in user confusion, inconsistent route identification, unauthorized travel, and management inefficiencies. These findings illustrate that transportation system design itself influences environmental outcomes.

Transportation network science demonstrates several important principles directly applicable to the Dinosaur North TMP.

- First, **connected transportation networks reduce unauthorized route creation.** When designated routes provide logical, efficient, and intuitive access to recreational destinations, visitors are substantially less likely to create informal bypasses, shortcut trails, or user-created connections. Conversely, fragmented transportation systems containing disconnected segments, dead-end routes, or inaccessible destinations often increase incentives for unauthorized travel. Numerous recreation management studies have identified inadequate transportation planning, not simply visitor misconduct, as a contributing factor to unauthorized route proliferation (FHWA, 2017; Marion & Wimpey, 2017).
- Second, **network redundancy improves environmental resilience.** Transportation systems containing multiple access options allow managers to temporarily close individual routes for seasonal wildlife protection, post-fire rehabilitation, flood recovery, infrastructure repair, or resource restoration while maintaining overall public access. By contrast, highly simplified transportation systems often force all recreation onto a limited number of corridors, increasing concentrated use, congestion, maintenance demands, and localized ecological disturbance.
- Third, **distributed recreation reduces concentrated impacts.** Recreation ecology consistently demonstrates that concentrating all use into fewer locations may reduce the geographic footprint of disturbance but often increases impact intensity where use remains. Soil compaction, vegetation loss, campsite expansion, parking congestion, dust generation, trail widening, and visitor conflicts frequently increase with concentrated recreational use (Hammitt et al., 2015). Therefore, transportation network simplification does not necessarily produce proportional reductions in environmental effects.



The Browns Park Special Recreation Management Area provides an instructive example. The EA identifies 65 routes providing access to recreation destinations within the SRMA, 27 routes providing Green River access, and numerous dispersed camping opportunities distributed throughout the recreation area. This dispersed transportation system distributes visitors among numerous recreational settings rather than funneling all users into a small number of access corridors. Maintaining this distribution aligns with contemporary recreation ecology by reducing localized resource pressure while preserving visitor experience quality.

Scientific Literature Supports Adaptive Management Over Permanent Restriction

Perhaps the most significant advancement within natural resource management has been widespread adoption of adaptive management as the preferred framework for managing ecological uncertainty. Adaptive management recognizes that ecological systems are inherently dynamic. Climate variability, wildfire, invasive species, hydrologic changes, wildlife population fluctuations, recreational demand, and vegetation succession all influence resource conditions over time. Consequently, management decisions based upon static assumptions frequently become outdated as ecological conditions evolve (Williams, Szaro, & Shapiro, 2009). Rather than relying upon permanent restrictions imposed under uncertain scientific conditions, adaptive management emphasizes:

- monitoring resource conditions;
- evaluating measurable management objectives;
- implementing targeted mitigation;
- assessing management effectiveness;
- and adjusting management actions based upon observed outcomes.

This iterative process has become standard practice throughout contemporary conservation biology because it explicitly acknowledges scientific uncertainty while allowing management to improve through learning.

The Vernal Resource Management Plan similarly emphasizes monitoring, maintenance, upgrades, relocation where feasible, partnership development, and adaptive transportation management before route closure whenever practicable. The Draft EA's inclusion of monitoring and implementation measures appropriately reflects these principles. This adaptive framework should be elevated within the Final EA as the preferred scientific response wherever resource impacts remain uncertain or capable of mitigation.

Permanent route closures represent the least flexible management option available. Once implemented, they eliminate opportunities to evaluate whether engineering improvements, seasonal restrictions, educational initiatives, drainage improvements, or targeted maintenance



could have achieved equivalent conservation outcomes while preserving public access. Adaptive management, by contrast, preserves future management flexibility while maintaining consistency with FLPMA's requirement to balance multiple uses rather than maximizing any single resource objective.

Scientific Uncertainty Does Not Justify Presumptive Closure

Scientific uncertainty occupies an important but frequently misunderstood role within environmental decision-making. **The absence of complete scientific certainty does not relieve agencies of their obligation to make informed decisions, nor does it automatically justify selecting the most restrictive management alternative.** Rather, uncertainty should encourage proportionate management responses reflecting both the magnitude of potential environmental risk and the confidence associated with available scientific evidence. Courts have repeatedly recognized that NEPA requires agencies to disclose uncertainty and explain the scientific basis supporting their conclusions, not to assume worst-case scenarios unsupported by the administrative record (Robertson, 1989; Marsh, 1989).

Within the context of travel management, this principle is particularly important because many potential resource effects remain highly site-dependent. Wildlife responses vary among species and seasons. Soil erosion depends upon slope, parent material, precipitation, drainage, and maintenance. Vegetation responses depend upon ecological site characteristics, disturbance history, and invasive species dynamics. Hydrologic effects depend upon watershed position, drainage design, and storm frequency. Accordingly, broad assumptions that all routes contribute similarly to resource degradation are inconsistent with the best available ecological science.

Instead, scientific uncertainty generally supports one of three management approaches:

1. additional monitoring to improve understanding;
2. targeted mitigation addressing identified impact mechanisms; or
3. adaptive management allowing future adjustment as empirical information becomes available.

These approaches preserve management flexibility while reducing unnecessary restrictions upon public access.

The Draft EA already incorporates many of these concepts through route-specific analysis, implementation measures, and monitoring commitments. However, there are a myriad of routes for which the designation rationale in the Final EA must be expanded to ensure that route-specific management decisions remain firmly grounded in measurable ecological conditions rather than generalized assumptions regarding motorized recreation. Doing so will strengthen



both the scientific defensibility of the Final EA and its consistency with FLPMA's multiple-use mandate, NEPA's informed decision-making framework, and recreation ecology literature.

WILDLIFE RESOURCES

Wildlife Conservation Under FLPMA Requires Balanced Stewardship Rather Than Maximum Restriction

UPLA strongly supports the conservation of wildlife populations and the long-term ecological integrity of the Dinosaur North TMA. Healthy wildlife populations are fundamental components of public lands, and their conservation is entirely consistent with the values of responsible motorized recreation. However, neither FLPMA nor NEPA establishes wildlife conservation as an exclusive or dominant land management objective. Rather, Congress directed the BLM to manage public lands under principles of multiple use and sustained yield, balancing recreation, wildlife habitat, watershed protection, livestock grazing, mineral development, cultural resources, scenic values, and numerous other public interests in a manner that best serves the long-term public good (43 U.S.C. §§ 1701(a)(7), 1702(c), 1732(a)).

This distinction is particularly important within travel management planning. The purpose of the Dinosaur North TMP is not to maximize wildlife habitat by minimizing recreation wherever habitat overlap exists. Instead, **the Bureau must determine how existing transportation infrastructure can be managed to accommodate recreation while maintaining wildlife populations and habitat functions through scientifically defensible mitigation, adaptive management, and route-specific decision making.**

The Draft EA identifies Greater Sage-Grouse, elk, mule deer, and pronghorn as focal wildlife resources and evaluates how each alternative affects designated habitats surrounding 699 miles of inventoried routes. Rather than relying on route mileage alone, the analysis quantifies acres of designated habitat occurring within specified distances of route corridors, recognizing habitat acreage as a more meaningful ecological metric than simple route length. UPLA supports this evolution toward habitat-based analysis. However, **it is legally and administratively indefensible for habitat overlap alone to become the surrogate by which biological significance is inferred.**

The scientific literature overwhelmingly demonstrates that wildlife responses to transportation systems are influenced by far more than the presence of an existing road or trail. Behavioral ecology, landscape ecology, conservation biology, and recreation ecology consistently conclude that wildlife responses are governed by a complex interaction among disturbance frequency,



temporal patterns of use, vegetation structure, habitat quality, seasonal life-history stages, topography, human behavior, route design, and cumulative landscape disturbance (Forman et al., 2003; Trombulak & Frissell, 2000; Wisdom et al., 2018). Consequently, route proximity should be viewed as just one variable within a broader ecological context rather than a direct predictor of biological impact.

This distinction is critical because FLPMA does not authorize restrictions merely because a recreation route intersects mapped wildlife habitat. Wildlife habitat encompasses large portions of the western United States precisely because these landscapes remain ecologically productive. Congress anticipated that wildlife conservation would occur concurrently with recreation and other authorized uses through thoughtful land management rather than through categorical exclusion of one use wherever habitat exists.

The Vernal Resource Management Plan reflects this balanced philosophy by emphasizing route maintenance, monitoring, seasonal management, habitat restoration, education, reclamation, and adaptive management protocols alongside transportation planning. The TMP likewise incorporates implementation measures intended to reduce wildlife disturbance without necessarily requiring permanent closure of existing transportation infrastructure. These management tools require greater emphasis within the Final EA because they represent the very mechanisms through which FLPMA's multiple-use mandate is most effectively implemented.

Recent Revisions to the Endangered Species Act Reinforce the Need for Species-Specific, Evidence-Based Route Analysis

On July 14, 2026, the U.S. Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) finalized revisions to the Endangered Species Act (ESA) regulations rescinding the regulatory definition of "**harm**" contained in 50 C.F.R. § 17.3 (Rescinding the Definition of "Harm" Under the Endangered Species Act, 91 Fed. Reg. 31477, July 14, 2026). The Services concluded that the previous regulatory definition extended beyond the plain language adopted by Congress in ESA Section 9 by treating certain forms of habitat modification as prohibited "take" even where no direct injury or death to individual listed wildlife could be demonstrated. The agencies determined that the prior definition had improperly expanded the statutory meaning of "take" beyond what Congress enacted and therefore rescinded the regulatory definition to better align implementation of the ESA with the statutory text enacted by Congress.

While the Dinosaur North TMP is being prepared principally under FLPMA and NEPA, rather than through ESA consultation, this regulatory revision is nevertheless highly relevant to the Bureau's wildlife analysis because it reinforces a broader legal principle applicable throughout



federal land management: **landscape characteristics, habitat overlap, or the mere presence of sensitive species cannot independently serve as proxies for legally or biologically significant impacts to wildlife populations.**

Throughout the Draft EA, wildlife effects are frequently evaluated according to the acreage of mapped habitat occurring within specified distances of existing transportation routes. Such spatial analyses are valuable screening tools that help identify locations warranting additional review. However, they should not be interpreted as establishing that continued management of an existing designated route necessarily results in biological harm simply because that route traverses occupied habitat, Priority Habitat Management Areas, General Habitat Management Areas, crucial winter range, migration corridors, or other mapped wildlife resources.

The recent ESA regulatory revision underscores an important distinction between **habitat occupancy** and **demonstrable effects on wildlife**. The presence of a route within mapped habitat does not, standing alone, establish that continued designated use causes injury, mortality, reproductive impairment, or population-level consequences to the species occupying that habitat. Rather, biological significance depends upon the actual nature, intensity, duration, timing, and frequency of disturbance, together with the species' behavioral ecology, habitat condition, and the effectiveness of mitigation measures implemented through management.

This distinction is particularly relevant to the Dinosaur North TMP because the Draft EA evaluates approximately **699 miles of existing inventoried transportation routes**, not widespread construction of new transportation infrastructure. The overwhelming majority of routes analyzed already exist on the landscape and have coexisted with the wildlife populations currently occupying the planning area for decades. Consequently, route designation decisions should focus on whether continued management of individual existing routes can be demonstrated, through substantial evidence and the best available science, to produce measurable biological impacts that cannot reasonably be avoided through maintenance, seasonal management, route-specific mitigation, restoration, monitoring, visitor education, or other adaptive management measures.

The rescission of the regulatory definition of "harm" also supports a more disciplined analytical distinction between **potential habitat effects** and **actual effects to wildlife**. While habitat modification remains an important ecological consideration under FLPMA, NEPA, and the Bureau's land use planning responsibilities, the mere possibility that habitat conditions may be altered does not itself establish that a transportation route should be closed or designated as limited. Rather, decisions affecting public access should be supported by documented evidence demonstrating that continued designated use would be expected to produce biologically



meaningful impacts to the affected species that cannot be effectively addressed through less restrictive management approaches.

Accordingly, UPLA urges the Bureau to ensure that the Final EA distinguishes between habitat mapping, habitat screening, behavioral observations, and demonstrable biological impacts when evaluating route designations. This approach is fully consistent with FLPMA's multiple-use mandate, NEPA's requirement for reasoned and evidence-based decisionmaking, and the federal government's current interpretation of the ESA following rescission of the regulatory definition of "harm." By emphasizing measurable biological outcomes rather than relying upon habitat overlap or precautionary assumptions alone, the Bureau will strengthen both the scientific integrity and legal defensibility of the Final Travel Management Plan.

Management Decisions Should Be Grounded in Best Available Science

As discussed previously, NEPA requires agencies to take a "hard look" at environmental consequences before making decisions affecting federal lands (*Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 1989). Although NEPA is procedural rather than substantive, its analytical framework depends upon the quality of information supporting agency conclusions. Likewise, the Administrative Procedure Act requires agencies to articulate a rational connection between the evidence contained within the administrative record and the decisions ultimately reached (*Motor Vehicle Manufacturers Association v. State Farm Mutual Automobile Insurance Co.*, 463 U.S. 29, 1983). As such, wildlife management decisions must be supported by the best available scientific information, not merely by conservative assumptions where empirical evidence remains incomplete.

This principle is particularly important because wildlife science has advanced considerably during the past three decades. Earlier transportation planning often treated roads as uniformly detrimental ecological features. Wildlife ecology now recognizes that ecological responses exist along a continuum influenced by numerous interacting variables. Species differ dramatically in their tolerance to predictable human activity, responses vary seasonally, and many wildlife populations exhibit substantial behavioral adaptation to recurring disturbances where habitat quality remains high (Taylor & Knight, 2003; Sawyer et al., 2017).

The Draft EA acknowledges this complexity by noting that the severity of effects depends upon timing, explaining that route use during Greater Sage-Grouse lekking or nesting periods would be expected to produce greater impacts than use during other portions of the year. Similarly, use during crucial big-game winter ranges or fawning periods may produce greater disturbance than comparable use during less sensitive seasons. This acknowledgement is important because it



implicitly recognizes that wildlife disturbance is not determined solely by spatial overlap between transportation routes and habitat.

Peer-reviewed literature strongly supports this conclusion. Behavioral responses (including vigilance, temporary displacement, altered movement patterns, or increased flight initiation distances) represent the most commonly documented wildlife responses to recreational activity (Larson et al., 2016). However, behavioral responses should not automatically be interpreted as biologically significant population-level impacts. Animals routinely alter behavior in response to predators, weather, livestock, hunting, wildfire, and numerous naturally occurring stimuli. Conservation concern arises when behavioral responses become sufficiently frequent, prolonged, or intense to reduce survival, reproduction, recruitment, or long-term population viability.

The distinction between behavioral response and population effect is fundamental. Many studies document measurable changes in wildlife behavior while simultaneously reporting little evidence of demographic consequences (Taylor & Knight, 2003). Conversely, the principal long-term drivers of wildlife population decline are more commonly associated with habitat conversion, energy development, urbanization, invasive species, wildfire, drought, fencing, disease, and landscape-scale fragmentation rather than recreation occurring on established transportation corridors (Naugle, 2011; Sawyer et al., 2017). This distinction deserves greater emphasis throughout the Final EA.

Greater Sage-Grouse Conservation Must Focus on Biological Outcomes Rather Than Route Proximity Alone

Greater Sage-Grouse receives considerable attention within the Draft EA. The planning area contains 39 occupied breeding sites together with designated Priority Habitat Management Areas (PHMA), General Habitat Management Areas (GHMA), nesting habitat, summer habitat, winter habitat, and multiple lek-distance buffers. The EA quantifies 145,402 acres of PHMA, 73,379 acres of GHMA, and more than 131,000 acres occurring within four miles of occupied leks. Existing transportation routes intersect less than 1% of PHMA and GHMA habitat and 3% of habitat within one-quarter mile of occupied leks. These data are informative, but they cannot be interpreted as direct measures of biological effect.

Greater Sage-Grouse populations have declined across much of the Intermountain West due primarily to broad-scale habitat conversion, invasive annual grasses, altered fire regimes, utility-scale renewable energy development, conifer encroachment, infrastructure expansion, and landscape fragmentation (Connelly et al., 2011; Knick & Connelly, 2011). These drivers operate at landscape scales extending far beyond individual transportation routes. The Draft EA correctly



identifies several of these threats, including habitat fragmentation, recreation activities, predation, noise disturbance, and wildfire. However, the scientific literature indicates that these threats differ substantially in magnitude.

For example, invasive annual grasses and altered fire regimes have transformed millions of acres of sagebrush ecosystems throughout the Great Basin, eliminating nesting habitat over landscapes many orders of magnitude larger than the direct footprint associated with existing transportation corridors (Miller et al., 2011). Likewise, conifer expansion into sagebrush communities has reduced habitat suitability across extensive portions of the species' historic range, prompting large-scale conifer removal projects specifically intended to restore sage-grouse habitat (Boyd et al., 2017). Within this broader ecological context, transportation routes should be evaluated according to their actual contribution to these landscape-scale stressors rather than assumed to represent equivalent ecological threats.

The BLM's own Greater Sage-Grouse Approved Resource Management Plan Amendment appropriately recognizes this distinction by emphasizing avoidance, minimization, seasonal management, habitat restoration, and adaptive management rather than universal route closure. Those same principles must guide the Final TMP.

Habitat Fragmentation Is a Landscape Process, Not Simply the Presence of Roads

The Draft EA repeatedly references habitat fragmentation as a potential consequence of OHV use. While fragmentation is unquestionably an important ecological process, the scientific literature defines fragmentation much more precisely than simple route overlap. Landscape ecologists distinguish between habitat loss, habitat fragmentation, habitat degradation, and functional connectivity, each of which represents distinct ecological phenomena (Fahrig, 2003). Habitat fragmentation occurs when formerly contiguous habitat becomes subdivided into isolated patches that reduce movement, dispersal, or genetic exchange. Existing recreation routes do not necessarily produce this outcome.

Many designated routes within the Dinosaur North TMA have existed for decades, and wildlife populations currently occupying the area have persisted within landscapes already containing these transportation corridors. **The ecological question is therefore not whether routes exist, but whether continued management of existing designated routes measurably alters habitat function relative to existing conditions.**

The Draft EA evaluates existing inventoried routes rather than proposing construction of extensive new transportation corridors. This distinction is scientifically important because



construction of new roads often produces substantially greater ecological effects than continued use of existing routes whose disturbance footprints have already stabilized.

Moreover, fragmentation should not be evaluated independently of habitat quality. A high-quality sagebrush landscape containing an existing low-volume route may provide greater functional habitat than a degraded landscape without roads. Likewise, vegetation condition, invasive species prevalence, wildfire history, water availability, and predator communities frequently exert stronger influences on wildlife occupancy than transportation infrastructure alone.

Within the Final TMP, habitat fragmentation analyses must clearly distinguish between the physical presence of existing transportation infrastructure and demonstrable reductions in habitat functionality.

Fixed-Distance Buffers Must Be Treated as Planning Tools Rather Than Biological Thresholds

One of the principal analytical methods employed within the Draft EA is the use of standardized distance buffers surrounding occupied leks and designated habitats. Acres of routes occurring within one-quarter mile, 3.1 miles, and four miles of occupied Greater Sage-Grouse leks are compared among alternatives to estimate potential effects. UPLA recognizes that such buffers are widely used within land-use planning because they provide consistent spatial metrics. However, the scientific literature cautions against interpreting these administrative planning distances as universal biological thresholds.

Lek attendance, nesting success, brood survival, and seasonal habitat use vary considerably among populations depending upon topography, vegetation screening, route elevation, traffic frequency, seasonal timing, and human activity patterns (Connelly et al., 2011; Rowland et al., 2006). Two routes located identical distances from a lek may produce substantially different ecological responses depending upon these factors. As such, **the only relevant use of buffer distances is to function as screening tools identifying locations where additional analysis, monitoring, or mitigation may be warranted... not as automatic indicators that existing routes are biologically incompatible with wildlife conservation.**

The Draft EA already provides some recognition of this principle by incorporating seasonal limitations, implementation measures, route maintenance standards, monitoring, reclamation, and adaptive management protocols. UPLA strongly encourages the Bureau to emphasize these



scientifically supported management approaches as preferable alternatives to permanent route closure wherever resource objectives can be achieved through targeted mitigation.

Adaptive Management Represents the Strongest Scientific Framework for Wildlife Conservation

Perhaps the most significant development in wildlife conservation during the past several decades has been widespread adoption of adaptive management as the preferred framework for managing ecological uncertainty (Williams, Szaro, & Shapiro, 2009). Adaptive management acknowledges that ecosystems are dynamic and that management should evolve in response to monitoring data rather than remain fixed upon assumptions established at a single point in time. This philosophy is particularly well suited to the Dinosaur North TMA. Wildlife populations fluctuate in response to drought, wildfire, invasive species, vegetation succession, predator-prey dynamics, disease, climate variability, and landscape-scale habitat conditions. Recreation patterns likewise evolve over time. Under these conditions, management based upon iterative monitoring and measurable biological outcomes is inherently more scientifically defensible than management predicated on static assumptions regarding route proximity alone.

The Draft EA already contains the foundational elements of adaptive management through implementation measures including route maintenance, signing, monitoring, habitat restoration, reclamation, visitor education, and seasonal management. We recommend that the Final EA place substantially greater emphasis on these tools by establishing explicit monitoring thresholds, measurable biological performance indicators, and route-specific adaptive responses before considering permanent closures. Such an approach better reflects the best available and reputable wildlife science, strengthens compliance with FLPMA's multiple-use mandate, satisfies NEPA's requirement for informed decision-making, and ultimately provides greater flexibility to achieve durable conservation outcomes while preserving responsible public access to the Dinosaur North TMA.

Elk, Mule Deer, and Pronghorn Conservation Must Focus on Maintaining Functional Landscapes Rather Than Simply Reducing Route Mileage

The Draft EA identifies elk (*Cervus canadensis nelsoni*), mule deer (*Odocoileus hemionus*), and pronghorn (*Antilocapra americana*) as the principal big game species within the Dinosaur North TMA and evaluates the relationship between designated routes and mapped crucial habitats. The analysis identifies 196,532 acres of elk crucial habitat, 199,257 acres of mule deer crucial habitat, and 34,321 acres of pronghorn crucial habitat within the planning area. Existing inventoried routes intersect 2,083 acres (1%) of elk habitat, 2,335 acres (1%) of mule deer



habitat, and 592 acres (2%) of pronghorn habitat when measured within one-quarter mile of designated routes.

There is value in quantifying habitat overlap using acreage rather than simple route mileage. Nevertheless, as with the Greater Sage-Grouse analysis, habitat overlap cannot be interpreted as synonymous with biological impact. Wildlife ecology consistently demonstrates that ungulate populations respond primarily to habitat quality, forage availability, landscape permeability, seasonal disturbance patterns, predation, climatic variability, disease, and human activity intensity rather than the mere presence of existing transportation corridors (Sawyer et al., 2017; Middleton et al., 2013; Aikens et al., 2022).

The Draft EA correctly acknowledges that travel-related effects vary seasonally and that use during sensitive periods including winter concentration, calving, and fawning seasons may produce greater behavioral responses than use during other portions of the year. This recognition reflects an important principle of wildlife biology: disturbance is fundamentally a function of timing, frequency, duration, and predictability rather than simply spatial coincidence. Numerous studies have documented temporary avoidance behavior by elk and mule deer in response to motorized recreation. However, each study demonstrates that these behavioral responses are localized, reversible, and highly dependent upon use intensity. Many populations rapidly habituate to predictable, low-intensity recreation occurring on established travel corridors while exhibiting substantially stronger responses to dispersed human presence, repeated off-route travel, stalking behavior, or unpredictable disturbances (Taylor & Knight, 2003; Wisdom et al., 2018).

Similarly, Sawyer et al. (2017) demonstrated that landscape permeability and migration corridor integrity are more important predictors of ungulate population persistence than the existence of individual roads. Seasonal migration routes spanning tens or hundreds of miles may remain functional where transportation infrastructure is predictable and appropriately managed - whereas energy development, residential expansion, fencing, and large-scale habitat conversion frequently produce more substantial reductions in connectivity.

This distinction is especially relevant within the Dinosaur North TMA because the Draft EA evaluates existing inventoried routes, not widespread construction of new transportation corridors. Existing designated routes have already become integrated components of the current landscape, and the wildlife populations occupying the TMA have persisted under those conditions. Consequently, management must focus on minimizing incremental disturbance associated with route use rather than assuming that existing transportation infrastructure necessarily represents ongoing habitat degradation.



Elk

The Draft EA identifies extensive summer and winter range for elk throughout the planning area and notes that the Utah Division of Wildlife Resources recommends seasonal management and invasive species control as important conservation measures. These recommendations are consistent with contemporary ungulate management. Research throughout the Rocky Mountain West consistently identifies winter range quality as one of the principal limiting factors affecting elk population performance. Winter severity, forage availability, nutritional condition, wildfire, drought, predation, disease, and human development collectively influence survival and recruitment to a much greater degree than occasional recreation occurring along existing transportation corridors (Middleton et al., 2013).

Moreover, elk frequently exhibit behavioral plasticity, adjusting movement patterns and habitat use in response to predictable recreational activity while continuing to occupy high-quality habitat where forage and security cover remain available. Consequently, management strategies emphasizing seasonal timing restrictions, visitor education, predictable travel corridors, and maintenance of secure habitat blocks often achieve greater conservation benefit than broad reductions in transportation infrastructure.

The TMP Implementation Guide's provisions for monitoring, route maintenance, education, reclamation, and adaptive management provide the Bureau with an effective suite of management tools capable of addressing localized concerns without unnecessarily reducing overall transportation connectivity. Subsequently, any proposed route closure that is based on proximity to or potential impacts on elk population characteristics, propagation, mortality, habitat, and behavior must first be reconciled with the adaptive management protocol within the Implementation Guide, and, clearly demonstrate that all possible mitigation actions have been exhausted prior to designating any route as “limited” or “closed.”

Mule Deer

The Draft EA similarly identifies mule deer as a statewide management priority and recognizes habitat loss, degradation, invasive species, and wildfire among the principal threats to population sustainability. This assessment closely aligns with current scientific understanding. Across western North America, mule deer populations have experienced substantial long-term declines driven primarily by landscape-scale habitat change, prolonged drought, altered fire regimes, energy development, fencing, urban expansion, and degradation of winter range rather than recreation alone (Copeland et al., 2014; Sawyer et al., 2017).



Migration ecology has become one of the most significant areas of mule deer research. GPS telemetry studies demonstrate that migration routes function as complex ecological networks whose effectiveness depends upon maintaining broad landscape permeability rather than eliminating every source of disturbance within seasonal habitats. Indeed, many migration corridors successfully intersect highways, county roads, energy infrastructure, grazing allotments, and recreational transportation systems while continuing to support viable populations. The implication for travel management is important. Existing designated OHV routes must be evaluated according to whether they measurably impair migration, recruitment, or survival rather than solely according to habitat overlap. Where localized conflicts occur, targeted seasonal restrictions, temporary closures during migration, or educational measures provide more biologically meaningful conservation outcomes than permanent route elimination.

Pronghorn

Pronghorn present somewhat different ecological considerations because they rely upon expansive grassland and shrub-steppe habitats characterized by exceptional visibility and long-distance movements. The Draft EA notes that habitat degradation, invasive species, wildfire, and other landscape disturbances represent primary concerns for pronghorn conservation. Unlike cervids, pronghorn frequently respond more strongly to fencing and physical barriers than to predictable recreational activity. Numerous studies demonstrate that habitat permeability, fence design, and maintenance of open movement corridors exert substantial influence on pronghorn distribution and seasonal movements (Sawyer et al., 2017).

Within the Dinosaur North TMA, the mapped overlap between inventoried routes and pronghorn habitat remains relatively limited, with only 2% of designated habitat occurring within one-quarter mile of inventoried routes. While this overlap warrants appropriate management attention, it does not by itself establish that existing transportation routes materially impair population viability. Rather, conservation efforts must prioritize maintenance of habitat quality, invasive species control, restoration of degraded shrub communities, and preservation of broad landscape connectivity.

Other Wildlife Resources

Although the Draft EA emphasizes Greater Sage-Grouse and big game species, the broader wildlife community within the Dinosaur North TMA includes raptors, migratory birds, small mammals, reptiles, amphibians, pollinators, and numerous BLM sensitive species. These species differ considerably in their ecological requirements and responses to recreation. Consequently, a



single management prescription cannot reasonably be expected to optimize conservation outcomes for every taxonomic group.

For example, raptors may be sensitive to disturbance near active nest sites but largely unaffected by predictable recreation occurring outside nesting periods. Songbirds may respond primarily to vegetation structure and habitat composition. Reptiles and amphibians may be more strongly influenced by hydrologic conditions than by transportation infrastructure. Pollinator communities often respond to invasive plant abundance, wildfire, and vegetation diversity. Adaptive, species-specific management therefore represents a more scientifically defensible approach than generalized assumptions regarding motorized recreation across all wildlife resources.

Cumulative Effects Should Recognize the Contribution of Recreation

The Draft EA discusses ongoing and foreseeable activities throughout the planning area, including mineral development, livestock grazing, habitat restoration, invasive species management, recreation, and other land uses. However, cumulative effects analysis should carefully distinguish between activities producing landscape-scale habitat conversion and those occurring within existing transportation footprints. Landscape ecology consistently demonstrates that cumulative wildlife effects are dominated by large-scale habitat loss, vegetation conversion, wildfire, energy development, urbanization, and climate-driven ecological change (Fahrig, 2003; Knick & Connelly, 2011). Existing recreation routes contribute to cumulative effects, but their relative influence should be evaluated proportionately.

This proportionality is especially important given that the Draft EA itself notes existing and foreseeable habitat restoration initiatives throughout the planning area. Restoration of sagebrush communities, invasive species control, conifer removal, watershed improvements, and vegetation rehabilitation may substantially improve wildlife habitat over time, offsetting localized disturbances associated with recreation.

Evaluation of Alternatives

The comparative wildlife analysis illustrates an important feature of the Draft EA. Alternative A generally retains the lowest acreage of routes within designated habitats because it designates the smallest transportation network. Alternatives C and D correspondingly show greater acreage of designated routes overlapping mapped habitats because they designate substantially more existing inventoried routes. However, this relationship cannot automatically be interpreted as demonstrating proportionally greater biological impacts. The alternatives primarily differ in the designation status of existing routes already present on the landscape.



Wildlife currently experiences these routes under existing conditions because the majority remain physically present and are currently being used due to implementation limitations associated with the 2008 TMP. Thus, comparisons of habitat overlap primarily represent differences in future management designation rather than introduction of new transportation infrastructure.

Moreover, Alternative D incorporates implementation measures, monitoring, maintenance, route reclamation, visitor education, enforcement, and adaptive management capable of reducing wildlife impacts over time. These management tools should be viewed as integral components of wildlife conservation rather than secondary mitigation.

Support for Modified Alternative D

For these reasons, UPLA concludes that a **Modified Alternative D** best integrates contemporary wildlife science with FLPMA's multiple-use mandate. Our support the understanding that transportation systems can be managed adaptively to achieve both conservation and recreation objectives. Specifically, Modified Alternative D should:

- retain existing transportation connectivity where wildlife impacts remain manageable through monitoring, seasonal management, maintenance, education, or route-specific mitigation;
- apply seasonal restrictions where peer-reviewed science demonstrates heightened biological sensitivity, particularly during lekking, nesting, calving, fawning, or severe winter concentration periods;
- prioritize habitat restoration, invasive species control, and vegetation improvement as primary wildlife conservation strategies;
- establish measurable biological monitoring thresholds tied to population response rather than route proximity alone;
- evaluate individual routes according to documented resource conditions rather than generalized habitat overlap;
- and maintain flexibility to modify management if future monitoring demonstrates measurable biological effects exceeding established management objectives.

This adaptive framework is more consistent with modern conservation biology than permanent transportation reductions implemented under conditions of scientific uncertainty.

UPLA fully supports the Bureau's commitment to conserving Greater Sage-Grouse, elk, mule deer, pronghorn, and the diverse wildlife communities occupying the Dinosaur North TMA. However, the best available scientific literature demonstrates that wildlife conservation is



achieved through maintenance of functional ecosystems, high-quality habitats, landscape connectivity, adaptive management, and targeted mitigation rather than through reliance on route proximity as the principal indicator of ecological impact. The Draft EA already contains many of the foundational elements necessary to implement this approach, including monitoring, seasonal management, implementation guidance, habitat restoration, reclamation, visitor education, and route-specific management. These scientifically supported tools should become the primary mechanisms for balancing wildlife conservation with responsible public access.

We recommend that the Final EA place greater emphasis on biological outcomes rather than administrative distance buffers, evaluate route-specific conditions rather than generalized habitat overlap, and adopt a Modified Alternative D that preserves transportation connectivity while implementing adaptive, evidence-based wildlife management consistent with FLPMA, NEPA, the Vernal Resource Management Plan, and the best available contemporary wildlife science.

SOILS, EROSION, AND LONG-TERM SOIL FUNCTION

Sustainable Soil Stewardship Requires Site-Specific Management Rather Than Generalized Route Reduction

The conservation of soil resources represents one of the BLM's most fundamental statutory responsibilities. Healthy soils provide the physical foundation upon which virtually every other resource value depends, including vegetation communities, hydrologic function, wildlife habitat, forage production, watershed resilience, carbon storage, and recreational sustainability. UPLA fully supports the Bureau's objective of protecting soil productivity and minimizing accelerated erosion within the Dinosaur North TMA. However, the scientific literature demonstrates that effective soil conservation depends upon understanding the mechanisms driving erosion and soil degradation rather than assuming that reductions in route density necessarily produce proportional improvements in soil function.

FLPMA requires the BLM to manage public lands under principles of multiple use and sustained yield while preventing unnecessary or undue degradation (43 U.S.C. §§ 1701(a)(7), 1702(c), 1732(b)). Importantly, the statutory standard is not the elimination of all soil disturbance. Virtually every authorized use of the public lands... including livestock grazing, energy development, wildfire suppression, vegetation treatments, mineral extraction, recreation, and administrative management... results in some degree of soil disturbance. Rather, FLPMA requires the Bureau to distinguish between disturbances that can be sustainably managed and those producing unnecessary or undue degradation. This distinction is particularly important in travel management planning because transportation infrastructure itself frequently serves as a



soil conservation tool by concentrating vehicle travel onto durable, designated corridors and reducing the proliferation of unauthorized routes.

The Draft EA recognizes that soil impacts are highly localized and therefore evaluates effects within the immediate vicinity of designated transportation routes rather than across the broader landscape. The analysis further recognizes that downstream sediment transport is evaluated within the hydrology section because erosion processes extend beyond the initial point of soil disturbance. The analysis encompasses approximately 699 miles of inventoried routes throughout the TMA, all of which have been in active use due to implementation limitations associated with the 2008 Travel Management Plan.

This analytical framework provides an appropriate foundation. Nevertheless, UPLA calls attention to the fact that the Final EA must fully distinguish between **soil disturbance**, **soil degradation**, and **long-term impairment of soil function**, as these represent distinctly different ecological conditions with substantially different management implications.

Soil Science Demonstrates That Erosion Is Controlled Primarily by Site Characteristics Rather Than the Mere Presence of Existing Routes

Geomorphology and soil science have substantially advanced since many early travel management planning efforts were initiated. Contemporary research consistently demonstrates that erosion rates are governed primarily by interactions among slope gradient, soil texture, parent material, precipitation intensity, drainage characteristics, vegetation cover, watershed position, surface roughness, and maintenance practices rather than simply by whether or not a road or trail exists (Brooks, Ffolliott, & Magner, 2013; Renard et al., 1997; USDA Forest Service, 2017).

The Draft EA reflects this understanding by identifying three principal categories of soil sensitivity within the planning area:

- Highly erodible soils;
- Saline soils; and
- Soils having elevated potential for fugitive dust generation.

The EA identifies 193 miles (28%) of the 699-mile transportation network occurring within highly erodible soils, 94 miles (13%) within saline soils, and **135 miles (19%)** within soils having high potential for fugitive dust production. These conditions arise from naturally occurring geologic and geomorphic characteristics including shale-derived parent materials, dry washes, chemical soil properties, and erosive surface textures.



Importantly, these **data illustrate that the majority of the transportation network does not traverse the most erosion-sensitive soils identified within the planning area.** Even among routes occurring within sensitive soil types, susceptibility varies substantially depending upon topography, drainage, maintenance history, vegetation condition, traffic intensity, and seasonal moisture. Consequently, **scientific evidence does not support treating all designated routes as presenting equivalent soil risks.**

Rather, the available data strongly support prioritizing management attention toward the very limited portions of the transportation system where measurable erosion potential is greatest.

Biological Soil Crusts Warrant Protection Through Targeted Management Rather Than Broad Transportation Reduction

The Draft EA discusses biological soil crusts (biocrusts or cryptobiotic soils), recognizing their important ecological functions throughout portions of the planning area. Biological soil crusts contribute to surface stabilization, erosion resistance, nutrient cycling, moisture retention, and native plant establishment. They also reduce susceptibility to wind erosion while increasing infiltration and surface stability. UPLA strongly supports protecting these important ecological resources. However, **current ecological research indicates that biological soil crust conservation is best achieved by preventing new disturbance rather than broadly eliminating use of existing transportation corridors where disturbance footprints have already stabilized.** Belnap, Büdel, and Lange (2001), together with subsequent research by Weber, Büdel, and Belnap (2016), demonstrate that biological soil crusts are most vulnerable where intact crust communities experience repeated off-route disturbance, trampling, or new surface disruption. Conversely, concentrating travel on established, designated routes substantially limits additional crust disturbance by discouraging expansion of disturbance footprints into previously undisturbed soils.

The Draft EA similarly recognizes that existing route designations reduce opportunities for additional disturbance by confining vehicle travel to designated corridors and established spurs accessing existing campsites. This principle represents one of the strongest ecological arguments supporting a connected designated transportation network. A well-designed travel system channels recreational use onto durable surfaces while protecting surrounding undisturbed soils from incremental expansion of disturbance. Conversely, fragmented transportation systems may unintentionally encourage route braiding, unauthorized bypasses, dispersed parking, or informal campsite creation where visitors seek access unavailable through designated routes.

Subsequently, biological soil crust conservation must emphasize:



- strict prohibition of cross-country travel;
- rehabilitation of unauthorized routes;
- visitor education;
- route signing;
- monitoring;
- and targeted restoration.

These measures directly address the mechanisms responsible for crust degradation while preserving responsible access along established transportation corridors.

Soil Compaction and Rutting Should Be Evaluated According to Use Intensity and Seasonal Conditions

The Draft EA identifies soil compaction and rutting as potential effects associated with motorized recreation, particularly during periods of elevated soil moisture. Compaction reduces soil porosity, limits infiltration, inhibits root development, and may accelerate runoff where repeated disturbance occurs. These processes are well documented. However, **scientific literature also demonstrates that compaction is highly dependent upon traffic intensity, vehicle loading, soil moisture, and soil texture rather than merely route designation** (Ouren et al., 2007).

In arid and semi-arid environments characteristic of much of the Dinosaur North TMA, dry soils frequently exhibit substantially greater resistance to compaction than saturated soils. Consequently, the timing of vehicle use often exerts greater influence over soil response than annual use volume. This finding supports adaptive management strategies including temporary seasonal restrictions during unusually wet conditions rather than permanent route closures based solely upon mapped soil sensitivity.

Furthermore, the Draft EA acknowledges that implementation measures such as route maintenance, drainage improvements, signing, reclamation, monitoring, and visitor education can substantially reduce soil impacts over time. We strongly support continued emphasis on these proactive management practices and call attention to the need for robust mitigation analysis accompanied by clear demonstration that all possible mitigation measures have already been exhausted where any route is designated as “closed” or “limited” due to impacts on soil or erosion.

Erosion Should Be Evaluated According to Measured Sediment Production Rather Than Route Presence Alone



Perhaps the most important distinction within the soil science literature concerns the difference between erosion susceptibility and actual sediment production. Highly erodible soils possess greater potential for erosion under appropriate climatic conditions. However, potential does not necessarily translate into measurable sediment delivery. Sediment generation depends upon numerous interacting variables including precipitation intensity, runoff pathways, drainage connectivity, slope length, vegetation cover, road drainage design, and maintenance practices (Brooks et al., 2013). Thus, route proximity to erosive soils should function primarily as a screening criterion identifying locations warranting enhanced management rather than as evidence that unacceptable erosion is occurring.

The Draft EA identifies implementation measures capable of reducing sediment production through maintenance of drainage structures, route stabilization, erosion control, reclamation, and monitoring. These engineering and management approaches have demonstrated effectiveness throughout western transportation systems and generally provide greater long-term conservation benefit than relying exclusively upon route closure.

Fugitive Dust Must Be Managed Through Engineering and Maintenance

The EA identifies approximately 135 miles of routes occurring within soils having elevated fugitive dust potential. Under Alternative D, approximately 327 miles of designated routes would occur within these mapped soil types, reflecting the greater number of inventoried routes retained within the transportation network. While fugitive dust represents an appropriate consideration, current transportation engineering demonstrates numerous effective mitigation measures that substantially reduce dust generation without eliminating public access. These include:

- improved surface drainage;
- aggregate stabilization where appropriate;
- speed management;
- seasonal maintenance;
- vegetation retention adjacent to routes;
- and prioritization of maintenance resources toward high-use corridors.

Importantly, dust generation is strongly correlated with traffic frequency and vehicle speed rather than simply route existence (Gillies et al., 2005). Management should prioritize operational measures capable of reducing emissions while preserving transportation connectivity.

Comparative Evaluation of Alternatives



The Draft EA compares alternatives by examining the mileage of designated routes intersecting sensitive soil categories. Alternative A retains 193 miles within highly erodible soils, 94 miles within saline soils, and 135 miles within high fugitive dust potential soils. Alternative B produces nearly identical values. Alternative C increases designated mileage to 437 miles within highly erodible soils, 170 miles within saline soils, and 302 miles within high fugitive dust potential soils. Alternative D retains 483 miles, 196 miles, and 327 miles, respectively. These comparisons accurately describe differences in designated route mileage.

However, they should not be interpreted as demonstrating proportional increases in erosion. The alternatives largely differ in whether existing inventoried routes become designated rather than whether new disturbance will occur. Since the majority of these routes already exist and are presently being used due to implementation challenges associated with the 2008 TMP, the principal management question concerns how those routes will be maintained and managed in the future rather than whether they physically exist.

From a soil conservation perspective, Alternative D provides the Bureau with the greatest opportunity to manage erosion proactively because designated routes become subject to regular maintenance, monitoring, drainage improvements, visitor education, enforcement, and adaptive management. Conversely, concentrating recreation onto fewer designated routes will increase localized traffic intensity, accelerate wear, and increase maintenance demands on remaining corridors.

Thus we emphasize again that a Modified Alternative D provides the strongest long-term framework for protecting soil resources while fulfilling FLPMA's multiple-use mandate. Rather than relying primarily upon transportation reduction, Modified Alternative D should emphasize:

- route-specific erosion monitoring;
- engineering improvements for drainage and surface stability;
- seasonal management where soil moisture creates elevated susceptibility;
- aggressive protection of biological soil crusts adjacent to designated routes;
- rehabilitation of unauthorized routes;
- visitor education regarding off-route travel;
- adaptive maintenance based upon measured field conditions; and
- targeted reclamation where resource objectives cannot otherwise be achieved.

These management strategies directly address the physical mechanisms responsible for erosion while preserving transportation connectivity, reducing incentives for unauthorized travel, and improving long-term stewardship of the designated transportation system. Such an approach is fully consistent with the best available soil science, the implementation measures already



incorporated within the Draft EA, NEPA's requirement for informed decision-making, and FLPMA's statutory mandate to balance responsible public access with conservation of the Nation's public lands.

WATER RESOURCES, HYDROLOGIC FUNCTION, AND RIPARIAN ECOSYSTEMS

Sustainable Watershed Management Requires Addressing the Mechanisms of Hydrologic Impact Rather Than Simply Reducing Transportation Infrastructure

Water resources represent one of the most ecologically significant and interconnected resource values within the Dinosaur North TMA. Streams, wetlands, springs, riparian corridors, floodplains, and associated groundwater systems sustain aquatic ecosystems, provide critical wildlife habitat, regulate watershed processes, support recreation, and influence virtually every ecological function evaluated throughout this EA. UPLA fully supports the BLM's objective of protecting water quality, maintaining watershed function, and conserving riparian ecosystems. These objectives are fully consistent with FLPMA's multiple-use mandate, the Clean Water Act, and the Vernal Resource Management Plan.

The Draft EA identifies two principal questions regarding hydrologic resources: how route designation alternatives may affect water quality, hydrology, riparian areas, wetlands, and the Red Creek Watershed Area of Critical Environmental Concern (ACEC). The analysis encompasses the Green River watershed from Flaming Gorge Reservoir downstream through its confluence with the Duchesne River and includes the entire Red Creek watershed because hydrologic processes operate at the watershed scale rather than along isolated transportation corridors.

UPLA agrees with this watershed-scale analytical framework. However, **the Final EA must distinguish between the presence of transportation infrastructure and the physical mechanisms by which transportation infrastructure influences hydrologic systems.**

Watershed science consistently demonstrates that measurable impacts to water quality are governed by erosion processes, drainage connectivity, stormwater concentration, channel interception, maintenance conditions, and watershed geomorphology rather than by route designation status alone (Brooks, Ffolliott, & Magner, 2013; Dunne & Leopold, 1978; EPA, 2022). Consequently, travel management decisions must focus on identifying and mitigating the specific mechanisms capable of affecting water resources instead of assuming proportional relationships between route mileage and watershed degradation.



Such an approach is fully consistent with FLPMA's requirement to prevent unnecessary or undue degradation while simultaneously maintaining multiple authorized uses of public lands (43 U.S.C. §§ 1701, 1732). It also aligns with NEPA's requirement that agencies establish a rational connection between scientific evidence and management decisions rather than relying upon generalized assumptions regarding environmental risk (*Motor Vehicle Manufacturers Association v. State Farm Mutual Automobile Insurance Co.*, 463 U.S. 29, 1983).

Watershed Function Depends Primarily Upon Hydrologic Connectivity Rather Than Route Density

The Draft EA recognizes that the Dinosaur North TMA contains a remarkably diverse hydrologic system composed of perennial streams, intermittent channels, riparian corridors, wetlands, floodplains, springs, reservoirs, stock ponds, and seeps. Surface waters ultimately contribute to the Green River watershed while supporting 2,730 acres of riparian and wetland habitat on BLM-managed lands. The EA further identifies 244 miles of designated routes occurring within or crossing riparian and wetland areas, 34 perennial stream crossings, and 456 intermittent stream crossings throughout the transportation network. These figures identify the extent of interaction between transportation infrastructure and aquatic resources. However, they cannot be interpreted as measures of ecological impairment in isolation.

Hydrologic science distinguishes between hydrologic connectivity and spatial coincidence. A transportation route located near a stream does not necessarily contribute sediment, pollutants, or altered runoff to that stream. Rather, measurable effects depend upon whether runoff generated from the road surface becomes hydraulically connected to receiving waters through drainage pathways capable of transporting sediment or contaminants. Research by Croke and Mockler (2001), Wemple, Jones, and Grant (1996), and Brooks et al. (2013) demonstrates that the greatest hydrologic effects associated with roads occur where concentrated runoff is directly connected to stream channels without adequate drainage dissipation. Conversely, transportation corridors incorporating stable drainage structures, dispersed runoff, vegetated buffers, or topographic separation often produce substantially lower sediment delivery despite occupying similar watershed positions.

The Draft EA implicitly recognizes this distinction by identifying several variables governing water resource impacts, including soil erodibility, route surface composition, water crossing design, route proximity to waterways, frequency of use, and implementation practices. We urge the Bureau to elevate these variables from secondary considerations to primary analytical criteria because they represent the actual physical mechanisms driving hydrologic response.



Existing Transportation Infrastructure Should Be Evaluated According to Watershed Performance Rather Than Mere Proximity to Water Resources

An important distinction within the Draft EA concerns the nature of the transportation system itself. The alternatives do not propose construction of an entirely new road network. Instead, they evaluate designation of approximately 699 miles of existing inventoried routes that have remained in active use because of implementation challenges associated with the 2008 Travel Management Plan. This distinction substantially influences interpretation of potential watershed effects. Initial road construction generally produces the greatest degree of soil disturbance, vegetation removal, drainage alteration, and sediment mobilization. Once transportation corridors become established, however, long-term watershed performance depends primarily upon maintenance, drainage functionality, surface stability, and operational management rather than the continued existence of the roadway itself (Forman et al., 2003).

Accordingly, designation of existing transportation infrastructure cannot automatically be interpreted as creating new hydrologic disturbance. Instead, designation provides the Bureau with an opportunity to actively manage these corridors through maintenance, drainage improvements, monitoring, education, and restoration measures identified within Appendix F. These management activities frequently improve watershed performance by correcting drainage deficiencies, reducing rutting, stabilizing crossings, restoring unauthorized routes, and directing recreational travel onto maintained corridors rather than dispersed travel patterns. This principle represents one of the strongest scientific justifications for maintaining a connected designated transportation network.

Riparian Ecosystems Merit Focused Protection Through Targeted Management

The Draft EA identifies riparian ecosystems as among the most environmentally sensitive resources within the planning area. Riparian corridors perform numerous ecological functions including sediment filtration, bank stabilization, nutrient cycling, flood attenuation, groundwater recharge, wildlife habitat, and maintenance of aquatic biodiversity. We strongly supports rigorous protection of these resources. However, the best available science indicates that riparian conservation is most effectively achieved through management actions specifically addressing riparian processes rather than generalized reductions in transportation infrastructure across the broader landscape.

The Draft EA identifies several mechanisms through which designated routes may influence riparian systems:

- accelerated runoff;



- erosion and sediment transport;
- pollutant delivery;
- soil compaction;
- vegetation disturbance;
- degradation associated with informal parking and passing;
- and disturbance resulting from wet-weather travel.

Each of these mechanisms is highly amenable to targeted management. For example, drainage improvements reduce concentrated runoff. Crossing stabilization reduce bank erosion. Seasonal wet-weather restrictions minimize rutting and sediment generation. Delineated parking areas reduce vegetation loss adjacent to waterways. Educational signage and enforcement discourage unauthorized stream access. Restoration of closed user-created routes substantially reduce sediment production. Because these management measures directly address the mechanisms responsible for hydrologic degradation, they provide greater ecological benefit than relying exclusively upon permanent route closure.

The Red Creek Watershed ACEC Illustrates the Value of Site-Specific Watershed Management

The Red Creek Watershed ACEC receives particular emphasis within the Draft EA because of its recognized hydrologic importance. The ACEC encompasses 24,475 acres, and the Vernal Resource Management Plan specifically identifies sediment reduction into Red Creek and the Green River as one of its primary management objectives. The EA identifies 99 miles of designated routes within the ACEC together with 31 miles of routes within 100 meters of riparian areas, one perennial stream crossing, and 85 intermittent stream crossings.

These data provide a useful basis for evaluating watershed management alternatives. Importantly, however, the EA also acknowledges that Red Creek itself contains route crossings occurring on private and Trust Lands Administration (TLA) lands outside BLM jurisdiction. This observation underscores a fundamental principle of watershed science: watershed condition reflects cumulative land management across multiple ownerships rather than actions occurring exclusively on BLM-administered transportation routes.

Effective Red Creek watershed protection must emphasize integrated watershed management involving erosion control, vegetation restoration, drainage stabilization, and interagency coordination rather than focusing disproportionately upon route designation status.

The scientific literature consistently demonstrates that watershed restoration efforts addressing erosion sources throughout an entire drainage basin typically produce substantially greater



improvements in downstream water quality than isolated management actions affecting only one land ownership or one category of land use (Brooks et al., 2013).

Water Quality Must Be Evaluated Using Measured Indicators Rather Than Surrogate Variables

The Draft EA notes that several streams within the planning area are listed by the Utah Department of Environmental Quality as impaired waters, including portions of the Green River tributaries, Brush Creek, Diamond Gulch, Pot Creek, and Red Creek. Reported impairments include constituents such as *Escherichia coli*, selenium, dissolved oxygen, total dissolved solids, boron, aluminum, iron, temperature, and pH. We agree that these impairments warrant careful consideration. However, impairment listings alone do not establish causation attributable to motorized recreation.

Each identified constituent originates through distinct physical, biological, or geochemical processes. Selenium, boron, aluminum, iron, and total dissolved solids are frequently influenced by naturally occurring geologic formations, groundwater chemistry, irrigation return flows, or mineralized soils. Nutrient enrichment and *E. coli* often reflect livestock operations, wildlife, septic systems, or agricultural runoff. Temperature and dissolved oxygen respond to riparian vegetation, channel morphology, flow regime, and climatic conditions. Consequently, transportation routes cannot be presumed to contribute materially to every listed impairment without site-specific evidence demonstrating causal linkage.

We recommend that all watershed monitoring defined within this TMP prioritize direct measurement of sediment delivery, turbidity, suspended sediment concentration, crossing stability, and drainage performance associated with designated transportation corridors rather than relying primarily upon spatial proximity analyses.

Comparative Evaluation of Alternatives

The Draft EA compares alternatives using several hydrologic metrics, including mileage within riparian buffers, number of stream crossings, and route mileage within the Red Creek ACEC. Alternative A designates approximately 108 miles within 100-meter riparian buffers, 10 perennial crossings, 231 intermittent crossings, and 49 miles within the Red Creek ACEC. Alternative B designates 113 miles, 20 perennial crossings, 243 intermittent crossings, and 43 miles within the ACEC. Alternative C designates 224 miles, 33 perennial crossings, 572 intermittent crossings, and 80 miles within the ACEC. Alternative D designates approximately 243 miles within riparian buffers, 33 perennial crossings, 616 intermittent crossings, and 99 miles within the Red Creek ACEC. These comparisons accurately quantify differences in



designated route inventories. Nevertheless, greater designation mileage should not automatically be interpreted as proportionally greater watershed degradation.

The critical determinants of hydrologic performance remain route maintenance, crossing design, drainage functionality, erosion control, traffic frequency, seasonal conditions, and implementation effectiveness. The Draft EA itself recognizes that successful implementation (drainage improvements, route stabilization, monitoring, revegetation, and restoration) would reduce long-term sediment delivery and improve watershed resilience.

Support for Modified Alternative D

Evaluation of the Draft EA demonstrates that a Modified Alternative D provides the strongest long-term framework for protecting water resources because it retains the transportation network necessary for active management while allowing the Bureau to apply targeted watershed protections where monitoring demonstrates measurable resource concerns. Specifically, Modified Alternative D should prioritize:

- engineering improvements at stream crossings and drainage structures;
- adaptive monitoring of sediment production and crossing stability;
- seasonal restrictions where wet conditions substantially increase erosion risk;
- restoration of unauthorized routes contributing unnecessary sediment;
- riparian vegetation enhancement;
- watershed-scale coordination within the Red Creek ACEC;
- and ongoing maintenance capable of improving rather than merely preserving existing watershed conditions.

This approach reflects the best available hydrologic science by addressing the mechanisms responsible for watershed degradation rather than relying upon transportation reduction as the primary management strategy. It also fulfills FLPMA's multiple-use mandate by protecting aquatic resources while preserving responsible public access through a well-managed, monitored, and scientifically adaptive transportation system.

CULTURAL RESOURCES

Cultural Resource Stewardship Is Best Achieved Through Active Management Rather Than Broad Reductions in Public Access

UPLA strongly supports the identification, preservation, and responsible stewardship of the extraordinary cultural resources found throughout the Dinosaur North TMA. The archaeological



record preserved across Browns Park, the Green River corridor, Diamond Mountain, and the surrounding uplands represents an irreplaceable record of Indigenous occupation, prehistoric lifeways, Euro-American settlement, transportation history, and the broader cultural landscape of northeastern Utah. These resources possess scientific, educational, historical, and spiritual significance that warrants careful protection for present and future generations.

At the same time, Congress has never directed the BLM to preserve cultural resources through categorical exclusion of otherwise authorized public uses. Rather, the National Historic Preservation Act (NHPA), FLPMA, the Archaeological Resources Protection Act (ARPA), and NEPA collectively establish a management framework emphasizing inventory, consultation, avoidance where practicable, mitigation, monitoring, education, and adaptive stewardship while continuing to provide for the multiple uses of the public lands (16 U.S.C. §§ 470aa–470mm; 54 U.S.C. §§ 300101 et seq.; 43 U.S.C. §§ 1701–1787; 42 U.S.C. §§ 4321–4336h).

This distinction is of significant importance within the Dinosaur North TMA because the proposed action concerns designation and long-term management of an existing transportation network, not widespread construction of new transportation corridors. **The scientific and legal question therefore is not whether cultural resources deserve protection, they unquestionably do, but rather whether continued management of existing designated routes, coupled with appropriate protective measures, can conserve historic properties while maintaining lawful public access consistent with FLPMA's multiple-use mandate.**

UPLA believes the Draft EA provides a strong archaeological inventory and demonstrates substantial compliance with the Section 106 consultation process. However, the analytical framework demonstrates gaps and would benefit from placing greater emphasis on site-specific risk factors and active cultural resource management rather than relying predominantly upon route designation status as a surrogate for potential adverse effect.

The Administrative Record Demonstrates an Extensive and Scientifically Robust Cultural Resource Inventory

One of the strongest components of the Draft EA is the extensive archaeological investigation that has already been completed throughout the planning area. The BLM documents prehistoric, ethnohistoric, and historic resources spanning approximately 12,000 years of human occupation, including rock imagery panels, lithic scatters, habitation sites, hearths, pit houses, irrigation systems, homesteads, historic roads and trails, and Traditional Cultural Properties. The TMA also contains properties that are listed on, or eligible for listing in, the National Register of Historic Places (NRHP).



Importantly, the administrative record demonstrates that these resources have not been evaluated through generalized desktop analysis alone. Instead, the BLM completed an extensive multi-year inventory program involving:

- Class I existing data compilation;
- predictive modeling developed specifically for the Vernal Field Office;
- Class III intensive pedestrian surveys covering more than **20,000 acres**;
- incorporation of previous Settlement Agreement survey data;
- intensive inventory associated with the Browns Park ACEC;
- evaluation of **336 cultural sites** through the Section 106 process; and
- documentation of **117 isolated finds**, all determined not eligible for listing on the National Register.

This represents one of the more comprehensive archaeological datasets developed for a travel management plan and provides an appropriate foundation for route-specific management decisions.

UPLA commends the BLM for undertaking this level of inventory. Comprehensive archaeological surveys substantially improve decision quality by allowing management actions to focus on documented resources rather than relying upon speculative assumptions regarding undiscovered sites.

Cultural Resource Protection Should Focus on Demonstrated Mechanisms of Impact

The Draft EA appropriately recognizes that motorized recreation is only one of numerous activities capable of affecting historic properties. Mineral development, livestock grazing, range improvements, vegetation treatments, wildfire, recreation, dispersed camping, illegal artifact collection, vandalism, and natural erosional processes all influence long-term preservation of archaeological resources. This broader context is important because cultural resource degradation is fundamentally driven by specific mechanisms of impact, not simply by proximity to an existing transportation corridor.

The archaeological literature consistently identifies several primary mechanisms responsible for deterioration of historic properties:

- intentional vandalism and graffiti;
- illegal artifact collection and looting;
- unauthorized excavation;
- structural collapse resulting from natural weathering;
- erosion exposing buried cultural deposits;



- wildfire;
- vegetation encroachment;
- livestock trampling in localized settings;
- and, in limited circumstances, direct physical contact from vehicles.

(Hedquist et al., 2014; Lipe, 1974; King, 2013). The Draft EA similarly recognizes that potential adverse effects include vandalism, trash accumulation, erosion, dust deposition, tire disturbance, dispersed camping adjacent to sites, and increased public accessibility. We agree that these mechanisms warrant careful management.

However, it is important to distinguish between access and damage. Public access to cultural resources does not inherently result in adverse effects. Millions of visitors responsibly recreate throughout landscapes containing archaeological resources every year without damaging historic properties. Adverse effects generally arise where access is combined with unlawful behavior, inadequate site management, insufficient visitor education, lack of monitoring, or failure to provide appropriate protective infrastructure. Consequently, transportation management within this TMP must focus on reducing behaviors that produce documented impacts rather than broadly restricting access wherever archaeological resources occur.

Existing Transportation Corridors Support Cultural Resource Conservation

A recurring assumption within travel management planning is that reducing designated transportation routes necessarily reduces cultural resource impacts. While this relationship may exist under some circumstances, cultural landscape management recognizes that designated transportation systems frequently function as management infrastructure supporting long-term preservation. Well-defined transportation systems provide several important management benefits.

- First, they concentrate vehicle travel onto predictable corridors, reducing the likelihood of unauthorized cross-country travel through previously undisturbed archaeological deposits.
- Second, they improve the BLM's ability to monitor known cultural sites because access points, visitor movements, and maintenance activities become more predictable.
- Third, designated routes facilitate law enforcement patrols, archaeological monitoring, maintenance of interpretive infrastructure, and rapid response to reports of vandalism or looting.
- Finally, clearly designated transportation systems reduce visitor confusion regarding where motorized travel is permitted, thereby decreasing inadvertent trespass into sensitive archaeological areas.



The Draft EA itself recognizes that implementation measures (route signing, monitoring, legal enforcement, education, and protective management) represent important components of cultural resource conservation. UPLA strongly supports continued expansion of these active management strategies.

Dust, Erosion, and Rock Art Require Site-Specific Evaluation

The Draft EA discusses concerns regarding dust deposition on rock imagery panels and summarizes research conducted within Nine Mile Canyon and Carbon and Duchesne Counties. Those studies concluded that dust generated from unpaved roads could accelerate weathering under certain environmental conditions. However, the EA also notes an equally important finding from the 2008 Preservation Study: abrasion damage to sandstone rock art occurs only under specific conditions, and naturally occurring windborne particles derived from surrounding sandstone frequently possess hardness comparable to locally generated roadway dust.

This discussion illustrates an important scientific principle. Dust generation should not be treated as a uniform phenomenon across the TMA. The amount of dust reaching an archaeological resource depends upon numerous interacting variables, including:

- prevailing wind direction;
- distance between the route and the cultural resource;
- local topography;
- vegetative screening;
- traffic frequency;
- vehicle speed;
- soil texture;
- and seasonal climatic conditions.

Consequently, generalized assumptions regarding dust impacts should not substitute for site-specific evaluation.

Where monitoring demonstrates measurable dust accumulation affecting particularly sensitive rock imagery panels, the BLM possesses numerous management tools capable of reducing impacts without eliminating access. These include seasonal maintenance, speed management, vegetation retention, visitor routing, localized stabilization treatments where appropriate, and enhanced monitoring. Likewise, erosion affecting archaeological deposits should be addressed through drainage improvements, slope stabilization, and restoration of unauthorized disturbances rather than relying exclusively upon route closures.

Section 106 Encourages Avoidance, Minimization, and Mitigation



The NHPA establishes a procedural framework requiring federal agencies to identify historic properties, consult with interested parties, assess effects, and resolve adverse effects before approving undertakings (54 U.S.C. § 306108). Importantly, **Section 106 does not establish preservation through mandatory avoidance of every historic property, nor does it prohibit undertakings affecting cultural resources.** Rather, the implementing regulations expressly contemplate a hierarchy consisting of avoidance where practicable, minimization, and mitigation through consultation (36 C.F.R. Part 800).

The Draft EA reflects this framework by noting that the BLM is developing a Historic Properties Treatment Plan (HPTP) that will identify protective measures including monitoring, avoidance where appropriate, and site-specific management. The HPTP is intended to address potential adverse effects identified during the Section 106 consultation process. We strongly support completion and implementation of the HPTP. The existence of a comprehensive treatment plan substantially strengthens the rationale for managing existing transportation infrastructure through adaptive mitigation rather than assuming that route closure represents the only available protective measure.

Comparative Analysis of Alternatives

The Draft EA identifies **336 cultural sites** within the Area of Potential Effects (APE), of which **201 have been determined not eligible** for the National Register. Among the remaining resources, alternatives differ primarily in the number of designated routes intersecting or occurring within 300 feet of cultural sites. According to Tables 3-1 and 3-2, Alternative A includes 77 intersected cultural resources and 114 resources within 300 feet of designated routes; Alternative B includes 74 and 112, respectively; Alternative C increases those totals to 143 and 178; and Alternative D includes 156 intersected resources and 180 resources within 300 feet. Similarly, the EA estimates the number of historic properties potentially experiencing adverse effects requiring treatment under Section 106 as 9 under Alternative A, 11 under Alternative B, 43 under Alternative C, and 48 under Alternative D.

These comparisons accurately quantify the number of cultural resources associated with designated routes. However, they should not be interpreted as demonstrating equivalent differences in actual damage. **The alternatives primarily differ in the designation status of existing routes that are already present on the landscape and currently receiving public use due to implementation challenges associated with the 2008 TMP. Consequently, designation itself does not create new archaeological exposure. Rather, designation determines how those existing corridors will be managed in the future.**



Alternative D necessarily encompasses more archaeological resources because it retains substantially more of the existing transportation system. At the same time, Alternative D also maximizes opportunities for proactive management through implementation of the Historic Properties Treatment Plan, route monitoring, visitor education, law enforcement, maintenance, and site-specific mitigation.

Support for Modified Alternative D

UPLA concludes that a Modified Alternative D best balances long-term cultural resource stewardship with FLPMA's multiple-use mandate. Rather than relying primarily upon transportation reduction, Modified Alternative D should prioritize:

- implementation of the Historic Properties Treatment Plan before route-specific restrictions are considered;
- intensive monitoring of known archaeological sites adjacent to high-use routes;
- targeted protective measures at vulnerable rock imagery panels and historic structures;
- visitor education emphasizing archaeological ethics and legal protections under ARPA;
- increased law enforcement presence in areas with documented vandalism or looting;
- engineering solutions addressing localized erosion threatening archaeological deposits;
- and adaptive management allowing future route modifications where monitoring demonstrates measurable resource degradation.

These measures directly address the mechanisms responsible for adverse effects while preserving the transportation system necessary to facilitate stewardship, monitoring, and responsible public enjoyment of the remarkable cultural landscapes that make the Dinosaur North TMA such an exceptional component of America's public lands.

In this manner, the Final TMP can satisfy the procedural requirements of the NHPA, remain consistent with FLPMA's multiple-use framework, and ensure that cultural resources are protected through active, science-based management rather than through unnecessarily broad restrictions on public access.

BROWNS PARK ACEC AND RED CREEK WATERSHED ACEC

Areas of Critical Environmental Concern Should Be Managed Through Precision Stewardship Consistent with FLPMA's Multiple-Use Mandate

The Browns Park Area of Critical Environmental Concern (ACEC) and the Red Creek Watershed ACEC contain ecologically, culturally, recreationally, and historically significant



landscapes within the Dinosaur North TMA. Their designation reflects the presence of important values deserving careful management, including riparian ecosystems, wildlife habitat, cultural resources, historic landscapes, recreation opportunities, and watershed integrity.

At the same time, **designation as an ACEC does not alter FLPMA's underlying statutory framework governing multiple-use management.** Congress directed that ACECs receive "special management attention" to protect relevant and important values (43 U.S.C. § 1712(c)(3)); however, **neither FLPMA nor the implementing regulations establish ACECs as preservation areas in which otherwise authorized public uses are presumed incompatible.** Rather, the statutory purpose of an ACEC is to provide management tailored to the specific values for which the designation was established while continuing to administer public lands in accordance with FLPMA's multiple-use and sustained-yield mandate (43 U.S.C. §§ 1701(a)(7), 1702(c), 1732(a); 43 C.F.R. § 1610.7-2).

This distinction is particularly important in the context of travel management. The relevant legal question is not whether OHV recreation should occur within ACECs in the abstract, but whether designated transportation routes can be managed in a manner that protects the identified relevant and important values while continuing to provide the recreational opportunities expressly recognized by FLPMA and the Vernal Resource Management Plan. The Draft EA, viewed in its entirety, demonstrates that this balance is both achievable and consistent with the administrative record.

Browns Park ACEC Represents an Integrated Cultural, Ecological, and Recreational Landscape

The Browns Park ACEC is unique within the Vernal Field Office because its significance derives not from a single protected resource but from the interaction of numerous environmental, historical, and recreational values that collectively define the landscape. The Draft EA recognizes Browns Park as one of the principal recreation destinations within the planning area. The Browns Park Special Recreation Management Area (SRMA) encompasses 53 miles of designated routes, provides access to 65 recreation destinations, includes 23 miles of the Green River, and supports diverse recreational activities including dispersed camping, hunting, wildlife viewing, boating, fishing, hiking, equestrian use, mountain biking, sightseeing, and motorized recreation. Developed facilities include campgrounds, boat launches, trailheads, interpretive sites, and the John Jarvie Historic Site.

These recreational opportunities are not peripheral to the Browns Park landscape; they constitute one of the principal public values for which the area is managed. Indeed, the SRMA designation



itself reflects the BLM's long-standing recognition that Browns Park functions as a nationally significant recreation destination where public access is an intended management objective. This integrated landscape perspective is critically important because it demonstrates that recreation and conservation are not mutually exclusive values within Browns Park. Rather, they have coexisted for decades through active management of existing transportation infrastructure, visitor education, maintenance, law enforcement, and resource stewardship.

UPLA therefore calls attention to the legal and administrative imperative for the Bureau to continue evaluating and managing Browns Park as a **working multiple-use landscape** rather than as a resource area in which recreation is viewed primarily as a source of environmental conflict.

Existing Transportation Infrastructure Is Fundamental to the Browns Park Recreation Framework

One of the most significant findings contained within the Draft EA is that the existing transportation system functions as the primary mechanism by which visitors access Browns Park's recreational, historical, and natural resources. The EA identifies:

- 339 routes accessing recreation destinations throughout the TMA;
- 27 routes providing Green River access;
- 65 routes accessing recreation destinations within the Browns Park SRMA; and
- approximately 53 miles of designated routes within the Browns Park SRMA itself.

These figures illustrate that the transportation network is not merely a collection of individual roads. It functions as an interconnected recreation system supporting multiple recreational experiences across the landscape.

Visitors rarely travel to Browns Park for a single destination. Typical recreational itineraries combine river access, dispersed camping, fishing, scenic touring, historical interpretation, wildlife observation, and four-wheel-drive exploration within the same trip. Consequently, transportation connectivity directly influences visitor distribution, duration of stay, recreation quality, and the ability to experience the broader Browns Park landscape. This systems-based understanding is well supported by recreation planning literature, which recognizes transportation accessibility as one of the strongest predictors of recreation participation and visitor satisfaction (Manning, 2011; Stynes, 2011). Accordingly, management of the Browns Park ACEC must prioritize maintaining an integrated transportation network while addressing localized resource concerns through targeted management rather than broad reductions in network functionality.



The Comparative Alternatives Demonstrate the Importance of Maintaining Recreation Connectivity

The Draft EA provides a particularly informative comparison of how each alternative affects access to Browns Park resources.

Under Alternative A:

- only 7 of 27 Green River access routes remain OHV-Open;
- 21 of 65 recreation destination routes remain OHV-Open; and
- only 25 of the 53 miles within the Browns Park SRMA remain designated OHV-Open.

Alternative B provides modest improvement by retaining:

- 11 Green River access routes;
- 32 recreation destination routes; and
- approximately 25 miles within the SRMA open or limited.

By comparison, Figure 3-4 and Figures 3-2 through 3-3 illustrate that Alternatives C and D preserve substantially greater recreation connectivity. Alternative C retains approximately 48 of the 53 miles within the SRMA together with 21 Green River access routes and 62 recreation destination routes, while Alternative D retains essentially the entire Browns Park transportation system, including 53 miles within the SRMA, 26 Green River access routes, and 64 recreation destination routes.

These differences are significant. From both recreation planning and transportation network perspectives, Browns Park functions most effectively when visitors have access to numerous dispersed destinations rather than being concentrated onto a limited number of travel corridors. Distributed recreation reduces congestion, disperses visitor use, maintains diverse recreation experiences, and allows managers greater flexibility in responding to localized resource concerns through seasonal management or temporary closures without fundamentally disrupting overall access.

Special Management Attention Does Not Require Maximum Restriction

The statutory purpose of an ACEC is frequently misunderstood. FLPMA directs the BLM to provide "special management attention" to protect relevant and important values. Importantly, the statute does not define "special management attention" as synonymous with restricting public access. Rather, management should be tailored to the specific resources requiring protection.



Within Browns Park, the Draft EA identifies relevant concerns including riparian resources, cultural resources, wildlife habitat, recreation, and dispersed camping. Many of these concerns are already addressed through existing implementation measures including:

- route designation;
- maintenance;
- visitor education;
- monitoring;
- route signing;
- restoration of unauthorized routes;
- and adaptive management.

These tools directly address the mechanisms responsible for resource degradation.

For example:

- Riparian impacts can be reduced through crossing stabilization and drainage improvements.
- Cultural resources can be protected through monitoring, education, and the Historic Properties Treatment Plan.
- Wildlife concerns can be addressed through seasonal management and habitat restoration.
- Dispersed camping impacts can be managed through site designation and monitoring.

Because these measures specifically target resource impacts, they provide greater conservation benefit than relying primarily upon transportation reduction.

Red Creek Watershed ACEC Illustrates the Importance of Watershed-Scale Management

The Red Creek Watershed ACEC presents a different management context than Browns Park because its designation primarily reflects watershed protection objectives. The Draft EA identifies the Red Creek ACEC as encompassing approximately 24,475 acres and notes that the Vernal Resource Management Plan identifies reduction of sediment delivery to Red Creek and the Green River as one of its principal management objectives. The EA further identifies 99 miles of designated routes, 31 miles of routes within 100 meters of riparian areas, one perennial stream crossing, and 85 intermittent stream crossings within the ACEC under Alternative D. We strongly support these watershed protection objectives. However, the scientific literature consistently demonstrates that watershed condition is governed by cumulative hydrologic processes occurring across entire drainage basins rather than by transportation infrastructure alone (Brooks, Ffolliott, & Magner, 2013).



The Draft EA itself acknowledges that portions of Red Creek occur across private lands and Utah Trust Lands Administration holdings outside BLM jurisdiction. This observation reinforces the need for integrated watershed management because sediment delivery, channel stability, water quality, and riparian function respond to land uses occurring throughout the watershed. Accordingly, transportation management should be viewed as one component of broader watershed stewardship rather than the sole determinant of watershed health.

Adaptive Management Provides the Most Effective ACEC Management Framework

Both Browns Park and Red Creek illustrate why adaptive management represents the most scientifically defensible approach to ACEC administration. These landscapes are dynamic systems influenced by changing recreation demand, wildfire, invasive species, drought, flooding, vegetation succession, wildlife populations, and climate variability. Consequently, static management prescriptions established at a single point in time cannot reasonably anticipate every future management need.

The Draft EA already contains numerous implementation measures supporting adaptive management, including monitoring, maintenance, drainage improvements, restoration, visitor education, law enforcement, and route-specific management. These measures must be applied to route designation rationale for all routes and recreation infrastructure contained within each ACEC in order to provide the Bureau with flexibility to respond to observed resource conditions rather than relying exclusively upon permanent transportation reductions. Adaptive management also better fulfills FLPMA's multiple-use mandate because it allows conservation objectives to evolve alongside changing ecological conditions while maintaining responsible public access wherever resource objectives continue to be achieved.

Support for Modified Alternative D

We assert that a Modified Alternative D best fulfills the management objectives established for both the Browns Park ACEC and the Red Creek Watershed ACEC. This recommendation is not based upon maximizing route mileage but upon preserving the transportation framework necessary to support active stewardship of these nationally significant landscapes. Modified Alternative D should retain the highly connected recreation network within Browns Park while emphasizing:

- targeted protection of sensitive riparian corridors;
- implementation of the Historic Properties Treatment Plan;
- seasonal wildlife management where biologically justified;
- engineering improvements at stream crossings;



- adaptive monitoring of recreation use;
- restoration of unauthorized routes;
- continued visitor education;
- and collaborative stewardship with recreation organizations and local communities.

Within the Red Creek Watershed ACEC, Modified Alternative D should prioritize watershed restoration, erosion control, crossing stabilization, hydrologic monitoring, and drainage improvements based upon measured field conditions. These management approaches directly address the relevant and important values for which both ACECs were designated while remaining fully consistent with FLPMA, NEPA, the Vernal Resource Management Plan, and validated principles of ecosystem management.

Ultimately, the Browns Park ACEC and Red Creek Watershed ACEC demonstrate that conservation and public access are not competing philosophies but complementary objectives when guided by sound science, adaptive management, and thoughtful transportation planning. A well-managed designated route system allows the Bureau to protect sensitive resources, facilitate monitoring and maintenance, support local recreation economies, and preserve the public's ability to experience these remarkable landscapes in the manner Congress envisioned under the multiple-use framework established by FLPMA.

WILDERNESS STUDY AREAS AND LANDS WITH WILDERNESS CHARACTERISTICS

FLPMA Establishes Distinct Legal Frameworks for Wilderness Study Areas and Lands with Wilderness Characteristics

UPLA recognizes the importance of preserving the wilderness values that Congress directed the BLM to protect where legally applicable. At the same time, it is equally important that management decisions accurately distinguish among the fundamentally different statutory authorities governing designated Wilderness, Wilderness Study Areas (WSAs), Lands with Wilderness Characteristics (LWCs), and BLM Natural Areas. **These land classifications carry materially different legal obligations, management discretion, and public access considerations. Conflating them risks expanding administrative authority beyond that authorized by Congress and, in the context of travel management, may elevate wilderness preservation above FLPMA's multiple-use mandate.**

FLPMA established a one-time wilderness review process under Section 603, directing the BLM to inventory roadless areas meeting minimum size and wilderness suitability criteria and to



manage designated Wilderness Study Areas under a nonimpairment standard until Congress determined whether to designate them as components of the National Wilderness Preservation System (43 U.S.C. § 1782). This statutory mandate applies specifically to Section 603 WSAs. By contrast, Lands with Wilderness Characteristics are administrative inventory units created pursuant to FLPMA's broader land use planning authorities under Sections 201 and 202 (43 U.S.C. §§ 1711, 1712). LWCs do not receive statutory wilderness status, are not managed under Section 603's nonimpairment mandate, and remain fully subject to the BLM's balancing of multiple uses through the resource management planning process.

Federal courts have consistently recognized this distinction. **While the BLM possesses authority to inventory and consider wilderness characteristics during land use planning, those characteristics do not independently create de facto wilderness or supersede FLPMA's multiple-use mandate** (*Norton v. Southern Utah Wilderness Alliance*, 542 U.S. 55, 2004; *Rocky Mountain Oil & Gas Association v. Watt*, 696 F.2d 734 (10th Cir. 1982)). Rather, wilderness characteristics constitute one resource value among many that the Bureau may consider when exercising its planning discretion.

The Draft EA appropriately distinguishes between WSAs, LWCs, and BLM Natural Areas. UPLA emphasizes the need for the BLM for maintaining this legal distinction and reminds the TMP planning team of the legal and administrative obligation for the Final EA to require that management of these areas remains grounded in their respective statutory authorities rather than applying a uniform preservation standard across fundamentally different land classifications.

The Existing Transportation Network Predates Current Wilderness Inventories and Constitutes an Established Component of the Existing Landscape

One of the most important factual findings contained within the Draft EA is that the transportation network evaluated under the Dinosaur North TMP consists almost entirely of existing inventoried routes, many of which have existed for decades and predate both the current LWC inventories and portions of the wilderness inventory process itself.

The EA identifies four Lands with Wilderness Characteristics within the planning area:

- Hoy Mountain (5,712 acres; 5 miles of existing routes),
- Split Mountain Benches (2,342 acres; 14 miles),
- Stone Bridge Draw (4,400 acres; 11 miles), and
- Tolivers #2 (6,403 acres; 2 miles),

for a total of 32 miles of existing routes occurring within inventoried LWCs. The EA also identifies seven BLM Natural Areas containing 109 miles of existing routes and two Wilderness



Study Areas (Diamond Breaks and West Cold Springs) containing 7 miles of existing routes. Importantly, the EA notes that these routes have remained in continuous public use because implementation of the 2008 TMP was never completed.

These facts are significant for two reasons.

First, the alternatives concern **future designation of existing transportation infrastructure**, not construction of new routes penetrating previously roadless landscapes. Consequently, evaluation of wilderness characteristics must distinguish between longstanding transportation corridors that have become integrated components of the existing landscape and proposals introducing new surface disturbance into previously undisturbed areas.

Second, the continued existence of these routes has not prevented the BLM from identifying and inventorying the surrounding landscapes as possessing wilderness characteristics. This demonstrates an important planning principle: the presence of primitive transportation routes does not eliminate opportunities for solitude, primitive recreation, or the presence of naturalness across broader landscapes.

Wilderness Characteristics Are Landscape Attributes Rather Than Absolute Conditions

The Draft EA appropriately evaluates the four principal elements comprising wilderness characteristics:

- naturalness;
- opportunities for solitude;
- opportunities for primitive and unconfined recreation; and
- supplemental values, including geological, paleontological, historical, scientific, and ecological resources.

This analytical framework is consistent with BLM Manual 6310 and contemporary wilderness inventory methodology.

However, the scientific literature regarding landscape perception consistently demonstrates that wilderness character exists along a continuum rather than as an absolute binary condition. Naturalness, scenic integrity, perceived remoteness, and opportunities for solitude are influenced by numerous interacting variables including topography, vegetation screening, landscape scale, visual exposure, sound propagation, visitor density, and temporal patterns of use (Cole & Hall, 2010; Manning, 2011). Consequently, **the mere presence of an existing primitive road does not diminish wilderness character to a biologically or experientially meaningful degree.**



This principle is reflected throughout the BLM's own inventory methodology, which evaluates entire landscapes rather than assigning determinative weight to isolated transportation features. Indeed, the Draft EA specifically notes that routes occurring within several LWC and WSA units are **primitive, infrequently maintained, and infrequently used**, characteristics that substantially influence visitor perceptions of naturalness and solitude.

UPLA therefore urges the Bureau to center evaluation of wilderness characteristics using landscape-scale analyses rather than treating route designation alone as the principal determinant of wilderness quality.

Primitive Recreation Is Itself a Recognized Wilderness Value

A particularly important aspect of the Draft EA is its recognition that wilderness characteristics include opportunities for primitive and unconfined recreation. Historically, primitive recreation has often been interpreted narrowly as nonmotorized recreation. However, neither the Wilderness Act nor FLPMA defines primitive recreation exclusively by mode of travel. Recreation scholarship instead recognizes primitive recreation as an experiential continuum emphasizing self-reliance, challenge, remoteness, minimal infrastructure, and immersion within natural landscapes (Driver & Brown, 1978; Manning, 2011).

Within the Dinosaur North TMA, many existing four-wheel-drive routes provide precisely these experiences. Visitors traveling primitive, low-standard roads frequently encounter long distances without developed facilities, minimal evidence of modern infrastructure, expansive natural landscapes, and opportunities for self-directed exploration that closely resemble the experiential qualities sought by many nonmotorized visitors. The transportation mode differs, but many of the experiential attributes remain similar. The Draft EA acknowledges that visitors may experience solitude and primitive recreation despite the presence of existing routes because most are infrequently maintained and receive relatively low levels of use. This observation is supported by recreation carrying capacity literature demonstrating that visitor perceptions of solitude depend more strongly upon encounter rates and human presence than upon the existence of primitive transportation infrastructure (Manning, 2011).

Accordingly, preservation of primitive recreation opportunities should not automatically be equated with reducing the designated transportation network.

The Existing Transportation System Supports Stewardship of Wilderness Resources



Transportation infrastructure also performs an important management function within landscapes containing wilderness characteristics. Existing routes facilitate:

- wilderness monitoring;
- invasive species control;
- wildfire suppression;
- ecological restoration;
- search and rescue operations;
- law enforcement;
- archaeological monitoring;
- and scientific research.

The Draft EA appropriately notes that implementation activities associated with route designation (signing, reclamation, monitoring, restoration of unauthorized routes, and maintenance) may improve protection of wilderness characteristics by reducing unauthorized travel and concentrating recreational use on designated corridors. These management benefits deserve greater emphasis. Contemporary conservation biology increasingly recognizes that active stewardship requires carefully managed access rather than complete exclusion.

Transportation systems supporting restoration, monitoring, and resource protection can enhance long-term conservation outcomes while preserving opportunities for responsible public enjoyment.

Scientific Evaluation of Alternatives

The Draft EA provides a detailed comparison of route designation within each LWC, BLM Natural Area, and WSA.

Within the Lands with Wilderness Characteristics:

- Alternative A designates 0 of 32 miles.
- Alternative B designates 2 miles (6%).
- Alternative C designates 29 miles (91%).
- Alternative D designates 32 miles (100%).

Within the Wilderness Study Areas:

- Alternative A designates 1 of 7 miles (14%).
- Alternative B designates 1 mile (14%).
- Alternative C designates 6 miles (86%).
- Alternative D designates **7 miles (100%)**.



Likewise, the seven BLM Natural Areas retain progressively greater portions of their existing transportation systems under Alternatives C and D, with Alternative D maintaining 100 of 108 existing route miles (93%).

These comparisons accurately describe differences in route designation. However, they should not be interpreted as directly measuring changes in wilderness character. The alternatives evaluate transportation routes that already exist on the landscape. Consequently, designation itself does not create new visual intrusions, alter topography, or introduce new linear disturbances. Rather, designation establishes how existing transportation corridors will be managed moving forward. Moreover, the Draft EA repeatedly notes that implementation of route designation (monitoring, reclamation of unauthorized routes, education, signing, and adaptive management) may improve protection of wilderness values relative to the existing condition by reducing dispersed travel outside designated routes.

Support for Modified Alternative D

We assert once again that a Modified Alternative D provides the most balanced and legally defensible framework for managing Lands with Wilderness Characteristics and Wilderness Study Areas. This recommendation recognizes that wilderness characteristics constitute important resource values deserving thoughtful stewardship while also acknowledging that FLPMA requires those values to be balanced with recreation, access, and other authorized public land uses. Modified Alternative D should emphasize:

- retention of existing primitive transportation corridors where wilderness values remain substantially intact;
- reclamation of unauthorized routes outside the designated network;
- continued monitoring of naturalness, solitude, and supplemental values;
- adaptive management where measurable degradation is documented;
- visitor education promoting Leave No Trace ethics and responsible route use;
- coordination of restoration activities within LWCs, WSAs, and BLM Natural Areas; and
- route-specific management rather than broad transportation reductions based solely upon administrative boundaries.

Such an approach recognizes that wilderness stewardship is most effective when grounded in measurable resource conditions, landscape-scale ecological function, and adaptive management rather than assumptions that transportation access and wilderness values are inherently incompatible.

Ultimately, the Draft EA demonstrates that many of the Dinosaur North TMA's wilderness landscapes have retained their defining characteristics despite the long-standing presence of a



limited network of primitive routes. The Final TMP should build upon that existing balance by preserving opportunities for primitive recreation, protecting natural and supplemental values, and maintaining the carefully managed transportation network that enables both public enjoyment and effective stewardship of these exceptional public lands.

PUBLIC SAFETY, ACCESSIBILITY, ADA, AND EQUITY CONSIDERATIONS

Public Safety Is a Core Component of FLPMA's Multiple-Use Mandate and Should Be Evaluated as an Independent Planning Objective

The Draft EA appropriately recognizes that travel management is fundamentally a transportation planning exercise. While the document necessarily evaluates biological, hydrologic, cultural, and scenic resources, it should likewise recognize that the designated transportation system functions as critical public infrastructure supporting visitor safety, emergency response, accessibility, and equitable enjoyment of the public lands. These considerations are not merely secondary social benefits of recreation; they are integral components of responsible public land management and are directly relevant to the BLM's obligations under FLPMA, NEPA, the Americans with Disabilities Act (ADA), Section 504 of the Rehabilitation Act, and the BLM's own Outdoor Recreation Program policies.

FLPMA directs the BLM to manage the public lands "in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archeological values" while simultaneously providing for recreation and other multiple uses (43 U.S.C. §§ 1701(a)(8), 1732(a)). Public safety is inherent in this mandate. A transportation network that fails to provide reasonable emergency access, creates avoidable visitor conflicts, or unnecessarily limits safe access to public lands does not fully satisfy Congress's directive to manage federal lands for the benefit of all Americans.

The Draft EA demonstrates that the Dinosaur North TMA encompasses approximately 699 miles of inventoried routes, 339 routes providing access to recreation destinations, 27 routes providing access to the Green River, 65 recreation destination routes within the Browns Park Special Recreation Management Area (SRMA), numerous dispersed camping opportunities, and access to nationally significant public lands including Dinosaur National Monument, Flaming Gorge National Recreation Area, Ashley National Forest, and extensive BLM-administered backcountry. These routes constitute far more than recreational amenities. They function as an interconnected public transportation system supporting emergency response, visitor safety, law enforcement, wildfire suppression, search and rescue operations, infrastructure maintenance, scientific monitoring, and equitable access to federal lands.



In keeping with this on-the-ground reality, the Final EA must evaluate public safety as an independent planning consideration rather than solely as an ancillary consequence of route designation.

Transportation Network Connectivity Is Fundamental to Emergency Response and Visitor Safety

One of the most overlooked functions of public land transportation systems is their role in supporting emergency management. The Dinosaur North TMA encompasses expansive, remote landscapes characterized by rugged topography, limited cellular coverage, highly variable weather conditions, extensive dispersed recreation, and substantial distances from emergency medical services. Visitors utilize these lands for four-wheel-drive recreation, hunting, fishing, boating, hiking, dispersed camping, mountain biking, horseback riding, sightseeing, and numerous other recreational activities occurring across hundreds of thousands of acres. **Within this context, transportation redundancy is not merely a matter of recreational convenience; it constitutes a critical public safety asset.**

Transportation engineering literature consistently demonstrates that resilient transportation systems depend upon **network connectivity**, **route redundancy**, and **multiple access options**, allowing emergency responders to reach incidents from alternate directions when individual routes become blocked by flooding, wildfire, rockfall, mechanical failures, or other unforeseen events (Federal Highway Administration [FHWA], 2021). The Draft EA itself recognizes that the transportation network provides access throughout the planning area rather than serving isolated destinations. The extensive network of Green River access routes, Browns Park destination routes, dispersed campsites, and primitive roads illustrates the interconnected nature of travel within the TMA. Maintaining this connectivity substantially improves the ability of county sheriffs, emergency medical personnel, volunteer search and rescue organizations, wildland firefighters, Utah Division of Wildlife Resources personnel, and BLM staff to respond efficiently to emergencies occurring throughout the planning area.

Conversely, transportation systems characterized by reduced connectivity will increase emergency response times by eliminating alternate access routes, requiring longer travel distances, concentrating recreation onto fewer corridors, or forcing responders to approach incidents from less efficient directions. Because emergency response effectiveness directly influences visitor safety, transportation connectivity should be evaluated as an independent public benefit within the Final EA.



Public Safety Extends Beyond Emergency Response to Include Operational Safety of the Transportation System

The Draft EA correctly emphasizes implementation measures including signing, maintenance, monitoring, visitor education, route designation, and adaptive management. These actions improve not only resource protection but also transportation safety by reducing visitor confusion regarding route status, minimizing navigation errors, and encouraging predictable travel patterns. Transportation safety research consistently demonstrates that clearly designated, well-maintained transportation systems reduce user conflicts and improve operational safety by:

- reducing unauthorized route creation;
- minimizing uncertainty regarding legal travel corridors;
- improving emergency wayfinding;
- facilitating maintenance;
- supporting consistent mapping; and
- concentrating management resources on designated infrastructure (FHWA, 2017).

This principle is especially important given the implementation challenges associated with the 2008 TMP, which the Draft EA identifies as contributing to visitor confusion because numerous inventoried routes remained physically available despite never receiving final designation.

Completion of the Dinosaur North TMP therefore presents an important opportunity to improve visitor safety through a transportation system that is both legally clear and operationally intuitive.

Accessibility Requires Recognition That Motorized Access Is the Primary Means by Which Many Americans Experience Public Lands

Federally managed public lands belong equally to every citizen, including individuals whose physical abilities limit their capacity to access remote landscapes through nonmotorized means. The Americans with Disabilities Act (42 U.S.C. §§ 12101-12213) and Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. § 794) prohibit discrimination on the basis of disability in federally conducted programs and require agencies to provide meaningful access to public services unless doing so would fundamentally alter the nature of the program or create undue administrative burdens.

These statutory obligations extend beyond developed visitor centers and campgrounds. For many Americans with mobility impairments, advanced age, chronic medical conditions, or temporary physical limitations, motorized transportation represents the only practical means of experiencing remote public lands. Four-wheel-drive vehicles, side-by-sides, adaptive off-highway vehicles, and other street-legal or OHV transportation provide access to scenic



overlooks, wildlife viewing opportunities, historic sites, river corridors, geological features, dispersed camping, and primitive landscapes that would otherwise remain inaccessible.

The Draft EA recognizes the extensive network of routes providing access to recreation destinations, Green River access points, Browns Park recreation opportunities, and primitive backcountry settings. Preservation of this transportation network therefore directly supports accessibility for individuals who cannot reasonably reach these landscapes by hiking or horseback travel.

The U.S. Access Board has likewise recognized that outdoor accessibility should be evaluated within the context of preserving opportunities for participation in natural settings rather than assuming all visitors possess equivalent physical capabilities (U.S. Access Board, 2013). Accordingly, transportation planning for this TMP must consider accessibility as a substantive public benefit rather than merely an incidental consequence of recreation management.

Equity Considerations Extend Beyond Disability to Include Geographic, Economic, and Demographic Access

Recent federal policy has appropriately emphasized equitable access to federal programs and public services (the EXPLORE Act, 2025). Although equity is often discussed in terms of race, ethnicity, or income, equitable public land management also encompasses the practical ability of diverse Americans to experience the nation's public lands regardless of geography, age, physical ability, economic circumstances, or recreational preference.

Motorized recreation frequently provides one of the lowest-cost means by which families, older adults, veterans, individuals with disabilities, and rural communities access expansive public landscapes. Unlike highly developed recreation requiring expensive equipment or specialized permits, existing public road and trail systems allow visitors to experience large landscapes using personally owned vehicles already utilized for everyday transportation or modest recreational use.

The Browns Park SRMA illustrates this principle particularly well. The network of 65 recreation destination routes, extensive dispersed camping opportunities, Green River access, historical sites, and scenic touring routes provides opportunities accommodating visitors possessing widely differing physical abilities, financial resources, recreational interests, and levels of outdoor experience.



Substantial reductions in transportation connectivity may therefore disproportionately affect those populations least able to substitute physically demanding or more expensive recreational alternatives. Consideration of these equity implications is fully consistent with FLPMA's directive that public lands be managed for the benefit and use of the American people as a whole.

Search and Rescue, Wildfire Response, and Resource Protection Depend Upon Transportation Access

Public safety considerations extend beyond recreational visitors. Transportation infrastructure supports:

- county search and rescue organizations;
- emergency medical evacuation;
- law enforcement patrols;
- wildland fire suppression;
- invasive species management;
- wildlife management;
- watershed restoration;
- archaeological monitoring;
- and scientific research.

The Draft EA acknowledges that designated routes facilitate implementation activities including monitoring, maintenance, restoration, signing, reclamation, and adaptive management across the planning area. Maintaining transportation connectivity therefore enhances the Bureau's own capacity to fulfill its resource management responsibilities. Wildfire provides a particularly compelling example. Transportation corridors frequently function as access routes for initial attack, equipment staging, firefighter ingress and egress, and post-fire rehabilitation. Likewise, search and rescue operations routinely depend upon existing road networks to reduce response times and expand the geographic area that can be reached during critical rescue windows.

These public safety functions should be recognized as affirmative benefits associated with maintaining a resilient transportation system.

Comparative Evaluation of Alternatives

From a public safety and accessibility perspective, the alternatives differ not merely in route mileage but in overall transportation functionality.



- Alternative A retains the smallest designated transportation network and consequently provides the fewest opportunities for alternate emergency access, dispersed visitor distribution, and connectivity among recreation destinations.
- Alternative B modestly expands the designated system but continues to limit overall transportation redundancy.
- Alternatives C and D preserve substantially greater connectivity, maintaining access to Green River entry points, Browns Park recreation destinations, dispersed camping opportunities, and primitive transportation corridors that collectively support recreation, emergency management, and operational flexibility.

These differences have practical implications extending beyond recreation. Greater transportation connectivity improves emergency response options, supports maintenance efficiency, enhances accessibility for mobility-impaired visitors, facilitates law enforcement patrols, and increases resilience when temporary closures become necessary because of wildfire, flooding, infrastructure damage, wildlife management, or restoration activities.

Support for Modified Alternative D

Again, a Modified Alternative D most effectively advances public safety, accessibility, and equitable public access while remaining fully consistent with FLPMA's multiple-use mandate and the resource protection objectives identified throughout the Draft EA. Specifically, Modified Alternative D should:

- preserve transportation redundancy necessary for emergency response and search and rescue;
- maintain access to the extensive network of recreation destinations identified throughout the Browns Park SRMA and the broader Dinosaur North TMA;
- recognize motorized transportation as an essential accessibility tool for individuals with mobility limitations, older adults, veterans, and families;
- prioritize route maintenance, signing, mapping, and wayfinding improvements that enhance visitor safety;
- utilize seasonal or temporary management where localized safety or resource concerns arise rather than relying upon permanent transportation reductions;
- and incorporate public safety and accessibility as explicit evaluation criteria within future adaptive management decisions.

Ultimately, the transportation network evaluated under the Dinosaur North TMP represents critical public infrastructure serving functions that extend well beyond recreation alone. It supports emergency response, public safety, accessibility, resource stewardship, and equitable



enjoyment of some of northeastern Utah's most remarkable public landscapes. Recognition of these public benefits will strengthen the Final EA by ensuring that travel management decisions fully reflect the broad spectrum of public interests Congress directed the Bureau to balance under FLPMA's multiple-use framework.

SITLA ACCESS, COUNTY ROADS, AND R.S. 2477 CONSIDERATIONS

Travel Management Should Preserve Interjurisdictional Access and Respect Existing Transportation Rights

The Dinosaur North TMP occupies a uniquely complex transportation landscape in which BLM managed lands are extensively intermingled with Utah School and Institutional Trust Lands Administration (SITLA) parcels, private inholdings, county roads, state highways, and lands administered by other federal agencies. Unlike landscapes consisting predominantly of contiguous federal public land management, the Dinosaur North TMA contains a checkerboard pattern of agency and private entities that makes transportation connectivity an essential component of effective public land administration. Consequently, travel management decisions extend beyond recreational access alone; they directly influence the ability of state agencies, counties, adjacent landowners, permittees, emergency responders, and the public to lawfully access lands and interests administered under different legal authorities.

UPLA strongly encourages the Bureau to recognize that transportation planning within this mosaic must be guided not only by resource protection objectives but also by well-established principles of intergovernmental coordination, property access, and transportation continuity. FLPMA expressly directs the Secretary to coordinate land use planning with state and local governments and to provide meaningful consideration of state, local, and tribal land use policies "to the extent consistent with the laws governing the administration of the public lands" (43 U.S.C. § 1712(c)(9)). Likewise, the BLM's planning regulations emphasize coordination with state agencies and local governments throughout land use planning and implementation (43 C.F.R. Part 1600).

The Draft EA acknowledges that numerous transportation routes within the planning area provide access to lands outside BLM jurisdiction, including Utah SITLA parcels, private property, county transportation systems, Dinosaur National Monument, Ashley National Forest, Flaming Gorge National Recreation Area, and Utah Department of Wildlife Resources facilities. The EA further recognizes that Alternative D was specifically developed to maintain the highest level of access to lands beyond BLM management, including state trust lands and other public land jurisdictions.



UPLA strongly supports this planning objective because transportation continuity represents a legitimate multiple-use value independent of recreation itself.

Access to Utah School and Institutional Trust Lands Serves a Constitutionally Mandated Public Purpose

The Utah School and Institutional Trust Lands Administration occupies a unique legal position among neighboring landowners. Unlike conventional public land agencies, SITLA is constitutionally obligated to manage trust lands for the financial benefit of designated beneficiaries, principally Utah's public education system, pursuant to the Utah Enabling Act of 1894, the Utah Constitution, and Title 53C of the Utah Code. Revenue generated from trust lands directly supports Utah's public schools and other institutional beneficiaries through leasing, grazing, mineral development, recreation, renewable energy, and other lawful land uses. Because trust lands are frequently interspersed throughout the Dinosaur North TMA, continued public and administrative access to these parcels depends heavily upon transportation routes traversing BLM-administered lands.

The Draft EA repeatedly recognizes this interrelationship, noting that numerous inventoried routes provide access beyond BLM ownership and that portions of the transportation system traverse or connect with Trust Lands Administration parcels. For example, the Red Creek Watershed discussion acknowledges stream crossings occurring on Trust Lands Administration property beyond BLM jurisdiction, illustrating the interconnected nature of watershed management and transportation planning across ownership boundaries. Travel management decisions should therefore consider the practical implications of transportation connectivity for adjacent trust lands.

While the BLM retains authority to designate travel routes on federally managed public lands, those decisions must avoid impairing lawful access to state trust lands where reasonable transportation alternatives do not exist. Such coordination advances FLPMA's directive to cooperate with state governments while reducing the potential for fragmented transportation systems that complicate administration for multiple landowners.

County Transportation Systems Should Be Evaluated as Components of an Integrated Regional Network

The transportation system evaluated within the Draft EA does not operate independently from county road networks. Many primitive BLM routes originate from, terminate at, or intersect county-maintained roads before continuing onto federally managed public lands. Visitors



frequently travel seamlessly between county roads, BLM transportation routes, Utah Department of Transportation highways, and state trust lands during a single recreational or administrative trip. Likewise, county governments depend upon these transportation systems for emergency response, law enforcement, infrastructure maintenance, livestock management, wildfire suppression, and delivery of public services.

Transportation planning literature consistently recognizes that network performance depends upon continuity across jurisdictional boundaries rather than isolated management of individual ownerships (Federal Highway Administration [FHWA], 2021). Consequently, travel management decisions affecting BLM-administered routes should evaluate how proposed designations influence the functionality of the broader regional transportation system. The Draft EA already reflects this principle by recognizing that the transportation network provides access not only to BLM recreation destinations but also to Dinosaur National Monument, Flaming Gorge National Recreation Area, Ashley National Forest, Green River access points, Browns Park recreation destinations, dispersed campsites, and neighboring land ownerships.

UPLA encourages the Bureau to continue emphasizing transportation continuity as an important planning objective because disconnected transportation systems frequently generate operational inefficiencies, increased maintenance costs, visitor confusion, and diminished public safety.

R.S. 2477 Rights-of-Way Merit Careful Consideration During Route Designation

The Dinosaur North TMA also exists within a region where historic rights-of-way established pursuant to Revised Statute 2477 (R.S. 2477) continue to be an important component of the legal transportation landscape. Enacted as Section 8 of the Mining Act of 1866, R.S. 2477 granted "[t]he right of way for the construction of highways over public lands, not reserved for public uses" (Act of July 26, 1866, ch. 262, § 8, 14 Stat. 253). Although Congress repealed R.S. 2477 through FLPMA in 1976, Section 701(a) of FLPMA expressly preserved "valid existing rights" established before repeal (43 U.S.C. § 1701 note; FLPMA § 701(a)). The existence, scope, and legal status of individual R.S. 2477 claims remain matters of applicable federal and state law and, in many instances, have not been finally adjudicated. Accordingly, the Draft EA appropriately avoids attempting to resolve ownership or validity questions through the travel management process.

Nevertheless, transportation planning should recognize that designation decisions occur within a broader legal framework where county road authorities, asserted R.S. 2477 rights, and existing public transportation corridors may overlap. The Tenth Circuit has repeatedly recognized that FLPMA did not extinguish valid preexisting R.S. 2477 rights-of-way (*Southern Utah Wilderness*



Alliance v. Bureau of Land Management, 425 F.3d 735 (10th Cir. 2005); *Kane County v. United States*, 772 F.3d 1205 (10th Cir. 2014) (en banc)). Likewise, the Supreme Court has acknowledged that questions concerning preexisting property interests must generally be resolved through the legal mechanisms established by Congress rather than administrative planning documents (*Wilkie v. Robbins*, 551 U.S. 537, 2007).

The Final TMP must clearly state that route designation decisions neither adjudicate nor prejudice any valid existing transportation rights that may exist under applicable federal or state law. Such clarification protects the integrity of the travel management process while avoiding unnecessary legal ambiguity regarding issues beyond the scope of the EA.

Transportation Connectivity Supports Efficient Public Land Administration

One of the strongest planning principles reflected throughout the Draft EA is recognition that transportation infrastructure serves numerous administrative functions extending beyond recreation. The existing route network facilitates:

- wildlife management;
- range administration;
- mineral management;
- cultural resource monitoring;
- watershed restoration;
- vegetation treatments;
- law enforcement;
- emergency response;
- wildfire suppression;
- scientific research;
- and maintenance of public infrastructure.

Because these activities frequently occur across multiple ownerships, maintaining transportation continuity reduces duplication of infrastructure while improving administrative efficiency. The checkerboard ownership and management pattern characteristic of portions of the Dinosaur North TMA reinforces this need.

Transportation systems that provide coordinated access across federal, state, county, and private lands generally reduce unnecessary route proliferation because multiple users can utilize the same existing corridors rather than constructing or seeking additional access points. From both transportation planning and conservation perspectives, preserving existing shared transportation infrastructure often represents the least environmentally disruptive long-term management strategy.



Fragmentation of Transportation Networks Can Produce Unintended Management Consequences

Transportation planning should also consider the unintended consequences of reducing network continuity across ownership boundaries. Fragmented transportation systems may:

- concentrate travel onto fewer remaining corridors, increasing maintenance demands;
- complicate access to isolated SITLA parcels;
- reduce operational flexibility for county road departments and emergency responders;
- require longer travel distances to reach administrative sites;
- increase fuel consumption and vehicle emissions associated with longer travel routes;
- reduce efficiency of wildfire suppression and restoration activities; and
- encourage repeated requests for new access authorizations where existing routes no longer provide practical connectivity.

The Draft EA recognizes that many inventoried routes function as connectors linking multiple recreation destinations, Green River access points, Browns Park facilities, neighboring public lands, and lands beyond BLM ownership. These transportation functions should be explicitly recognized as legitimate public benefits within the Final EA

Coordination with Counties and the State of Utah Advances FLPMA's Planning Objectives

FLPMA expressly contemplates collaborative planning among federal, state, and local governments. Section 202(c)(9) directs the Secretary to "keep apprised of State, local, and tribal land use plans" and to assist in resolving inconsistencies where practical (43 U.S.C. § 1712(c)(9)). This statutory directive reflects Congress's recognition that effective public land management depends upon intergovernmental cooperation rather than isolated federal decision-making.

The Draft EA demonstrates coordination throughout the planning process, including consultation with Uintah and Daggett Counties, the State of Utah, SITLA, cooperating agencies, and tribal governments. UPLA supports these efforts and encourages continued coordination during implementation, particularly where future adaptive management decisions may affect transportation connections serving multiple jurisdictions. Such collaboration will improve transportation planning while reducing the likelihood of future conflicts regarding access, maintenance responsibilities, emergency response, and public use.

Comparative Evaluation of Alternatives



The alternatives evaluated within the Draft EA differ substantially in their ability to preserve transportation continuity across jurisdictional boundaries.

- Alternative A retains the smallest designated transportation network, thereby reducing the number of routes available to provide access to neighboring jurisdictions, trust lands, and interconnected recreation destinations.
- Alternative B modestly expands transportation connectivity but continues to limit numerous existing access corridors.
- Alternatives C and D preserve substantially greater continuity throughout the transportation system, including the extensive network of Browns Park access routes, Green River entry points, and routes serving lands beyond BLM ownership.
- The Draft EA explicitly identifies Alternative D as the alternative providing the highest level of motorized access to lands outside BLM jurisdiction.

This distinction represents an important planning consideration independent of recreation demand because interjurisdictional access supports efficient administration, emergency response, public safety, and coordinated land management across the broader landscape.

Support for Modified Alternative D

UPLA again concludes that a Modified Alternative D most effectively advances FLPMA's coordination requirements while preserving the transportation continuity necessary for responsible administration of the Dinosaur North TMA and adjacent lands. Specifically, Modified Alternative D should:

- preserve established transportation connections serving Utah SITLA parcels, county transportation systems, and neighboring federal land units wherever resource objectives can be achieved through route-specific management;
- recognize the importance of transportation continuity within the checkerboard ownership pattern characteristic of the planning area;
- continue coordination with Uintah and Daggett Counties, SITLA, the State of Utah, and other affected governmental entities regarding implementation and future adaptive management;
- clarify that route designation decisions do not adjudicate, extinguish, validate, or otherwise affect any valid existing transportation rights arising under R.S. 2477 or other applicable law;
- prioritize maintenance and management of existing shared transportation corridors before considering new access solutions; and
- evaluate future route-specific modifications according to their effects on regional transportation connectivity rather than solely within individual ownership boundaries.



By recognizing transportation infrastructure as a shared public asset supporting federal, state, county, and private interests, the Final Travel Management Plan will better fulfill FLPMA's multiple-use mandate, strengthen intergovernmental coordination, reduce unnecessary fragmentation of the regional transportation system, and preserve efficient public access to the diverse ownerships that collectively define the Dinosaur North landscape.

MONITORING, ADAPTIVE MANAGEMENT, AND FUTURE ROUTE MODIFICATION

Long-Term Success of the Travel Management Plan Will Depend More Upon Implementation Than Initial Route Designation

Travel management planning does not conclude with selection of a preferred alternative. Rather, route designation establishes the foundation for an ongoing management process that must respond to changing environmental conditions, evolving recreation patterns, new scientific information, technological advances, and lessons learned through implementation. Accordingly, the effectiveness of the Dinosaur North TMP will ultimately be determined not simply by the number of miles designated OHV-Open or OHV-Limited, but by the BLM's ability to implement the plan through systematic monitoring, adaptive management, interagency coordination, and evidence-based decision-making.

UPLA strongly supports the Draft EA's recognition that implementation activities including route signing, maintenance, drainage improvements, monitoring, restoration of unauthorized routes, visitor education, law enforcement, and rehabilitation constitute integral components of the travel management program rather than incidental administrative tasks. Throughout Chapter 3, the EA repeatedly concludes that many anticipated resource impacts can be reduced through these implementation measures and that proper implementation may improve resource conditions relative to the existing environment by concentrating travel on designated routes and eliminating unauthorized route proliferation. This conclusion is consistent with decades of transportation planning, recreation ecology, watershed science, and adaptive resource management literature. The scientific consensus is increasingly clear that conservation outcomes are generally determined by the quality of long-term management rather than by static land use designations alone (Williams, Szaro, & Shapiro, 2009; Williams & Brown, 2014).

For this reason, UPLA encourages the BLM to treat implementation as a dynamic management program supported by measurable performance standards, transparent monitoring protocols, and periodic evaluation rather than viewing the TMP as a fixed endpoint.



Adaptive Management Represents the Scientifically Preferred Framework for Complex Public Land Systems

The Dinosaur North TMA encompasses an exceptionally diverse landscape including riparian systems, upland sagebrush communities, pinyon-juniper woodlands, cultural landscapes, Areas of Critical Environmental Concern, Special Recreation Management Areas, wildlife habitats, grazing allotments, mineral resources, and an extensive existing transportation network serving hundreds of recreation destinations. These systems are inherently dynamic. Vegetation communities respond to drought, wildfire, invasive species, restoration treatments, and climatic variability. Wildlife distributions fluctuate seasonally and annually. Hydrologic processes evolve following storms, runoff events, and channel adjustments. Recreation demand changes in response to regional demographics, fuel prices, technology, and tourism. Likewise, maintenance needs vary according to weather, visitor use, and infrastructure age.

Modern ecosystem science recognizes that management of such complex social-ecological systems cannot rely upon static assumptions established during a single planning process (Holling, 1978; Williams et al., 2009). Adaptive management provides the most scientifically defensible framework because it treats management actions as hypotheses subject to ongoing evaluation through monitoring and iterative improvement. The Draft EA already incorporates numerous adaptive management concepts throughout its implementation measures. UPLA strongly supports this approach and recommends that adaptive management become an explicit organizing principle of the Final TMP.

Monitoring Should Be Built Upon Quantifiable Performance Metrics Rather Than Generalized Observations

Successful adaptive management depends upon reliable monitoring. However, monitoring programs are only as valuable as the information they collect. We recommend that future monitoring emphasize objective, repeatable, and scientifically measurable indicators capable of documenting actual environmental conditions rather than relying primarily upon qualitative observations or anecdotal reports. Appropriate performance indicators may include, where relevant to individual resource programs:

- documented route condition assessments using standardized engineering criteria;
- drainage functionality;
- erosion rates;
- stream crossing stability;
- sediment delivery measurements;



- vegetation recovery following restoration;
- invasive species occurrence;
- biological soil crust recovery;
- wildlife occupancy or habitat utilization;
- recreation use levels;
- visitor encounter rates;
- cultural resource condition assessments;
- unauthorized route occurrence;
- maintenance frequency;
- public safety incidents;
- and visitor compliance with designated travel requirements.

Many of these data are already collected through existing BLM resource programs.

Integrating these monitoring efforts into a unified transportation management framework would substantially improve the Bureau's ability to evaluate whether management actions are achieving intended objectives.

Equally important, **monitoring should distinguish between route presence and resource condition**. A route may remain designated and open for public use while adjacent resource conditions improve because of successful maintenance, drainage improvements, restoration, visitor education, or reduced unauthorized travel. Conversely, localized degradation may occur despite route closures if underlying causes involve natural erosion, wildfire, invasive species, livestock, flooding, or other unrelated factors.

Future management decisions must be based upon documented resource conditions rather than assumptions associated with designation status alone.

Future Route Modification Should Be Triggered by Demonstrated Resource Conditions Rather Than Speculative Risk

UPLA supports the BLM's authority to modify route designations where future monitoring demonstrates measurable resource degradation that cannot reasonably be addressed through maintenance, engineering improvements, education, enforcement, or other less restrictive management measures. However, **future modifications should occur within a clearly defined decision framework emphasizing transparency, scientific evidence, and public participation**. Transportation planning literature consistently recognizes that resilient transportation systems perform best when modifications occur in response to demonstrated operational needs rather than speculative projections (FHWA, 2021). Similarly, adaptive



resource management recommends incremental adjustments informed by empirical monitoring rather than irreversible management changes based upon uncertain future scenarios (Williams et al., 2009).

Accordingly, future route modifications should generally be preceded by:

- documented monitoring identifying measurable resource concerns;
- evaluation of causal mechanisms responsible for observed conditions;
- consideration of maintenance, restoration, engineering, or operational solutions;
- assessment of transportation network effects;
- interagency coordination where access to adjacent jurisdictions may be affected;
- public involvement;
- and documentation demonstrating why less restrictive management measures would be insufficient.

Such a framework strengthens administrative decision-making while ensuring continued compliance with FLPMA and NEPA.

Implementation Should Prioritize Restoration of Unauthorized Routes While Maintaining the Designated Transportation Network

One of the most important implementation opportunities identified throughout the Draft EA involves reclamation of unauthorized routes. The EA repeatedly concludes that concentrating public travel onto designated routes while restoring unauthorized disturbances represents one of the principal environmental benefits associated with implementation. This conclusion appears throughout analyses addressing soils, water resources, wilderness characteristics, cultural resources, wildlife habitat, and recreation. We strongly support this strategy. Transportation network science demonstrates that clearly designated route systems accompanied by effective signing, mapping, education, and restoration substantially reduce route proliferation because visitors possess clear expectations regarding lawful travel corridors. Conversely, incomplete implementation frequently creates uncertainty that contributes to continued use of undesigned routes.

The Draft EA recognizes that implementation challenges associated with the 2008 TMP contributed to the continued use of routes that had never been fully implemented or physically managed following the previous planning effort. Completion of the current TMP therefore presents an opportunity to finally establish a coherent transportation system supported by effective implementation rather than allowing continued uncertainty regarding route status.

Maintenance Should Be Recognized as an Environmental Protection Measure



Throughout the Draft EA, route maintenance is frequently discussed as an implementation activity. UPLA encourages the Bureau to recognize maintenance as an environmental protection measure in its own right. Proper maintenance (drainage improvements, culvert installation, rolling dips, outsloping, surface stabilization, vegetation management, crossing improvements, erosion control, etc.) frequently provides greater long-term environmental benefit than reducing route availability while allowing remaining infrastructure to deteriorate. Transportation engineering consistently demonstrates that preventive maintenance substantially reduces sediment production, infrastructure failure, emergency repairs, and long-term environmental impacts compared with deferred maintenance (FHWA, 2017).

The same principle applies throughout the Dinosaur North TMA. Maintained transportation infrastructure supports watershed protection, public safety, wildfire response, visitor access, cultural resource protection, and recreation management while reducing unnecessary environmental disturbance associated with repeated emergency repairs.

The Final EA should therefore emphasize that maintenance constitutes one of the primary conservation tools available to the Bureau.

Monitoring Results Should Be Publicly Available

Adaptive management depends upon public confidence. That confidence is strengthened when monitoring results are transparent, scientifically credible, and readily available for independent review. We recommend that future monitoring reports, route condition assessments, implementation updates, restoration accomplishments, and adaptive management evaluations be made publicly available whenever practicable through the BLM's website or other accessible platforms. Transparent reporting produces several important benefits. It improves public understanding of management decisions, encourages collaborative stewardship, facilitates independent scientific review, strengthens administrative accountability, and allows recreation organizations, counties, permittees, conservation organizations, and other stakeholders to participate more effectively in ongoing stewardship.

Public availability of monitoring information is also consistent with NEPA's fundamental objective of informed public participation throughout federal decision-making.

Recreation Organizations Represent Valuable Long-Term Stewardship Partners



Implementation of the Final TMP should fully utilize the extensive stewardship capacity that exists within Utah's organized recreation community. Organizations such as UPLA, local four-wheel-drive clubs, OHV organizations, county OHV programs, and volunteer stewardship groups routinely contribute thousands of hours annually toward:

- route maintenance;
- signing;
- invasive species removal;
- restoration;
- visitor education;
- cleanup events;
- trail monitoring;
- resource documentation;
- and public outreach.

This volunteer capacity represents a significant management asset. Numerous studies demonstrate that collaborative stewardship improves conservation outcomes while increasing public compliance, reducing maintenance costs, and strengthening long-term support for resource protection (Imperial, 2005; National Academies of Sciences, Engineering, and Medicine, 2023).

UPLA urges the BLM to continue expanding opportunities for volunteer partnerships through cooperative agreements, Adopt-a-Trail programs, monitoring partnerships, educational initiatives, and restoration projects.

Future Amendments Should Preserve Planning Stability While Allowing Targeted Refinement

Travel management plans should provide long-term regulatory stability while remaining sufficiently flexible to accommodate changing conditions. Accordingly, future route modifications should generally occur through targeted amendments supported by documented monitoring rather than through repeated landscape-scale reconsideration of the entire transportation network absent compelling justification. This approach provides several advantages. It allows management resources to focus on locations where measurable concerns actually exist, reduces unnecessary planning costs, preserves public confidence in the stability of designated routes, and minimizes uncertainty for counties, permittees, adjacent landowners, recreation organizations, and other cooperating agencies.

At the same time, it preserves the Bureau's flexibility to respond effectively where monitoring demonstrates legitimate resource concerns requiring management intervention.



Support for Modified Alternative D

UPLA concludes that a Modified Alternative D provides the strongest foundation for long-term implementation because it preserves the transportation connectivity necessary to support effective maintenance, monitoring, adaptive management, emergency response, resource stewardship, and future administrative flexibility. Specifically, Modified Alternative D should incorporate an implementation strategy emphasizing:

- completion of comprehensive route signing and mapping immediately following designation;
- systematic maintenance based upon engineering and resource protection priorities;
- restoration and rehabilitation of unauthorized routes;
- standardized monitoring protocols utilizing measurable performance indicators;
- periodic public reporting of monitoring results and implementation accomplishments;
- adaptive management based upon documented resource conditions rather than precautionary assumptions;
- continued collaboration with counties, SITLA, tribal governments, cooperating agencies, recreation organizations, and other stakeholders;
- utilization of volunteer stewardship partnerships wherever practicable; and
- future route modifications only after consideration of maintenance, engineering, education, enforcement, seasonal management, and other less restrictive alternatives capable of resolving documented resource concerns.

The Draft EA recognizes that route designation represents only the beginning of long-term transportation management. By fully embracing adaptive management, objective monitoring, transparent implementation, and collaborative stewardship, the Final TMP can continue evolving alongside changing environmental conditions while preserving the transportation system necessary to support responsible recreation, resource conservation, public safety, and effective administration of the remarkable public lands within the Dinosaur North TMA.

VOLUNTEER STEWARDSHIP PARTNERSHIP

Utah Public Lands Alliance believes that maintenance concerns should not become a justification for unnecessary route closures when capable volunteer resources are available to assist land managers.



UPLA represents a statewide network of approximately 49 affiliated OHV clubs, organized to trail events and rallies, and thousands of responsible recreationists willing to volunteer their time, equipment, and expertise to help maintain sustainable public access.

UPLA Commitment

For every Travel Management Plan, UPLA commits to working with the managing agency to identify local volunteer resources that can assist with trail maintenance, vegetation management, drainage improvements, erosion control, route signing, route monitoring, visitor education, illegal dumping cleanup, post-fire and post-storm recovery, hazard removal, trail condition reporting, and other resource protection projects.

Where appropriate, UPLA will help identify nearby clubs or volunteer organizations capable of adopting routes or participating in scheduled stewardship projects.

Recommendation to the Bureau of Land Management

UPLA requests that BLM include, within the implementation section of every Travel Management Plan, a commitment to actively pursue volunteer partnerships before considering future route closures based primarily upon maintenance limitations or staffing shortages.

Where route improvements are needed to protect resources or improve sustainability, volunteer organizations should be considered an integral part of the implementation strategy.

Project-Based Volunteer Assistance

BLM should develop a list of routes requiring drainage improvements, reroutes, tread stabilization, sign replacement, fencing, restoration, monitoring, or other maintenance.

UPLA will work with each field office to identify clubs and volunteers capable of assisting with these projects.

Local Volunteer Network

For each TMP planning area, UPLA will identify local volunteer resources, including four-wheel drive clubs, UTV organizations, motorcycle clubs, county OHV organizations, organized rally participants, and independent volunteers who can provide labor, equipment, trail expertise, and long-term stewardship.

Proven Success

The recommendation is based upon successful volunteer stewardship programs such as the San Bernardino National Forest Adopt-a-Trail Program, where organized volunteer clubs



have contributed tens of thousands of volunteer hours annually, helping maintain hundreds of miles of trails, rapidly reopen routes following storms and wildfires, improve visitor education, report resource damage and illegal activity, and significantly expand agency maintenance capacity.

Guiding Principle

Before closing a trail because an agency lacks the resources to maintain it, the Bureau must first determine whether qualified volunteers are willing and able to help maintain it. Responsible recreationists are not simply users of our public lands... they are among their most valuable stewards.

UPLA stands ready to partner with federal, state, county, and local land management agencies to develop practical, sustainable volunteer solutions that protect natural resources while preserving responsible public access. We believe volunteer stewardship should become a standard component of Travel Management Plan implementation throughout Utah and across the nation.

IMPLEMENTATION RECOMMENDATIONS

The effectiveness of any travel plan depends more upon implementation than upon the number of routes labeled open or closed. A well-designed network will fail if signs are confusing, drainage structures are not maintained, unauthorized routes remain unaddressed, visitor information is inaccurate, or enforcement is inconsistent. Conversely, active management can protect sensitive resources while preserving extensive access.

Complete Signing Before Enforcement

BLM should install accurate, durable, and clearly visible signs before enforcing new route designations. Signs should identify:

- route number;
- allowed vehicle classes;
- seasonal limitations;
- major destinations;
- jurisdictional transitions;
- dead ends;
- WSA or wilderness boundaries;
- closures;
- public-safety warnings.

Enforcement should not begin until the public can reasonably determine the lawful route alignment and designation.



Directional signing is particularly important where overlapping local names, county road numbers, BLM identifiers, and digital-map labels create confusion.

Publish Accurate Digital and Printed Maps

BLM should release:

- downloadable geospatial data;
- georeferenced PDF maps;
- a common-name crosswalk;
- route files compatible with commonly used navigation systems;
- printed maps at field offices and staging areas;
- a clear effective date and version number.

The agency should establish a method for correcting map errors promptly without requiring completion of an entirely new TMP.

Prioritize Safety-Critical and Connectivity Routes

Initial implementation funding should prioritize:

- Route 61A and comparable highway-avoidance connectors;
- heavily used loops;
- routes serving popular staging areas;
- routes with confusing intersections;
- alternate emergency exits;
- routes requiring crossing or drainage repair;
- routes where braiding is occurring because the designated alignment is unclear.

Implement Identified Route Maintenance

The Draft EA identifies route-specific maintenance needs, including repairing barricades at WSA boundaries, formalizing campsites, maintaining fencing, and hardening a stream crossing. These actions should be incorporated as binding implementation commitments with priorities and target dates. Additional member-identified work should include repair of rutting on Route 51 and management of braiding on Route 20WSA.

Maintenance should preserve the route's primitive or technical character where that character constitutes part of the recreation experience. Repair does not require transforming primitive routes into graded roads.

Address Braiding and Proliferation Through Delineation

Where users have created parallel tracks, BLM should:



- clearly mark the preferred alignment;
- block redundant tracks with natural materials;
- restore unnecessary disturbances;
- correct drainage or obstacles that caused users to leave the route;
- monitor compliance;
- work with clubs on restoration.

Closing the entire route is unnecessary where braiding can be corrected by defining and maintaining one sustainable alignment.

Formalize Appropriate Campsites and Pullouts

Rather than eliminate access because dispersed camping or parking occurs near resources, BLM should identify appropriate durable sites and close only the unsuitable locations. Route 32CC is already identified for campsite formalization.

Designated or clearly delineated dispersed sites can protect vegetation, soils, riparian areas, and cultural resources while retaining camping opportunities.

Coordinate with Uintah County, Daggett County, and the State of Utah

Implementation should include formal coordination with:

- Uintah County;
- Daggett County;
- Utah Public Lands Policy Coordinating Office;
- Utah Trust Lands Administration;
- Utah Division of Outdoor Recreation;
- Utah Division of Wildlife Resources;
- Utah State Historic Preservation Office;
- Utah State Parks;
- adjacent municipalities;
- law enforcement and search-and-rescue organizations.

Coordination is especially important for county roads, R.S. 2477 claims, State Trust Land access, staging areas, trail networks crossing jurisdictions, and emergency response.

Establish Cooperative Stewardship Agreements

BLM should enter cooperative agreements with UPLA and other qualified organizations for:

- trail-condition monitoring;
- sign inspection;
- cleanup;
- light maintenance;
- restoration of unauthorized tracks;



- education;
- visitor counts;
- reporting of cultural-resource damage;
- emergency information.

The history of volunteer work on Route 70WSA illustrates the effectiveness of local stewardship and the value of retaining access for users who actively maintain and monitor routes.

Provide Education Before Restriction

Visitor education should explain:

- stay-on-route requirements;
- cultural-resource protections;
- seasonal wildlife concerns;
- fire restrictions;
- waste and sanitation expectations;
- speed and right-of-way etiquette;
- restrictions on camping and parking;
- consequences of route widening.

Information should be provided at staging areas, online, through permit materials, and in partnership with local clubs and businesses.

Use Focused Enforcement

The Implementation Guide states that enforcement will prioritize public-safety areas, high-use locations, confusing routes, routes with limitations, sensitive-resource areas, and monitored routes.

UPLA supports this approach. Enforcement should focus upon conduct causing actual harm:

- cross-country travel;
- route creation;
- vandalism;
- artifact collection;
- dumping;
- driving around barriers;
- damage during temporary wet-weather closures;
- unsafe highway operation;
- noncompliance with seasonal limits.

Lawful users remaining on designated routes should not be treated as the management problem.

Sequence Closures and Reclamation Carefully



No route should be physically reclaimed until BLM has:

- verified the route identifier and alignment;
- confirmed the final decision;
- coordinated with Kane County and the State;
- evaluated valid existing rights;
- determined whether authorized access remains necessary;
- completed site-specific cultural and biological review;
- identified reclamation methods and funding;
- ensured that closure will not create a safety hazard or unauthorized bypass.

Because the Draft EA contains no route-specific reclamation plans, reclamation should occur only after the necessary site-specific review.

Secure Implementation Funding

BLM should prepare a five-year implementation budget identifying estimated costs for:

- signs;
- maps and data;
- maintenance;
- monitoring;
- law enforcement;
- cultural-resource treatment;
- biological surveys;
- crossing improvements;
- reclamation;
- volunteer coordination.

The agency should pursue appropriations, recreation grants, state partnerships, and cooperative agreements. Lack of funding should not result in failure to maintain open routes followed by closure because the resulting maintenance problem was left unaddressed.

Provide an Implementation Schedule

The Record of Decision should include an implementation schedule with milestones for:

- final mapping;
- signing;
- public education;
- priority repairs;
- baseline monitoring;
- cultural treatment measures;
- wildlife and plant surveys;
- first annual report;



- five-year review.

Conduct a Five-Year Network Review

BLM should formally review the network five years after implementation. The review should consider:

- whether route objectives are being met;
- whether closures produced claimed resource benefits;
- whether use was displaced;
- whether congestion increased;
- whether mitigation succeeded;
- whether routes should be reopened;
- whether new safety or access needs have arisen.

This review should be public and should not presume that every designation must remain unchanged indefinitely.

SUMMARY OF RECOMMENDATIONS

UPLA appreciates the substantial effort the Vernal Field Office has invested in developing the Draft EA and recognizes that the TMP Dinosaur North represents a consequential transportation planning effort undertaken within the Vernal Field Office in recent years. The Draft EA reflects a thoughtful analysis of the planning area's diverse ecological, cultural, recreational, hydrologic, scenic, and administrative resources. We believe the administrative record establishes a foundation upon which the Bureau can develop a durable and scientifically defensible Final Travel Management Plan.

After careful review of the Draft EA, supporting appendices, route reports, and implementation framework, UPLA concludes that Modified Alternative D most closely fulfills the Bureau's statutory responsibilities under FLPMA, NEPA, and the Travel Management Rule. Alternative D preserves the transportation network necessary to support multiple use, public access, emergency response, recreation, administrative operations, volunteer stewardship, and long-term resource management while providing the greatest opportunity to resolve localized resource concerns through adaptive management rather than widespread elimination of existing routes.

Nevertheless, the administrative record also demonstrates numerous opportunities to further refine Alternative D by retaining additional existing routes where route-specific evidence does not clearly establish that closure is necessary or where documented resource concerns can be effectively addressed through less restrictive management measures.



Throughout this comment letter, UPLA has consistently emphasized a single guiding principle: **public access and resource conservation are complementary objectives, not mutually exclusive management outcomes.** The Draft EA itself repeatedly recognizes that designated transportation systems, when properly implemented and maintained, improve visitor compliance, concentrate recreation onto sustainable corridors, facilitate monitoring and enforcement, support restoration of unauthorized routes, improve emergency response, and provide the Bureau with predictable opportunities to actively manage public use. Those findings are supported by contemporary recreation ecology, transportation planning, resilience theory, adaptive resource management, and decades of practical experience across western public lands. Accordingly, travel management should seek to optimize these conservation benefits rather than unnecessarily reduce the transportation network where active management can achieve equal or superior resource protection.

To strengthen the Final EA and Record of Decision, UPLA recommends that the Bureau:

- **Adopt a Modified Alternative D** as the preferred alternative while retaining additional existing routes where closure is not supported by substantial route-specific evidence demonstrating unavoidable resource impacts.
- **Evaluate transportation infrastructure as an interconnected system**, recognizing that individual routes contribute to overall network connectivity, redundancy, loop opportunities, emergency response, administrative access, visitor distribution, recreation quality, and long-term landscape resilience.
- **Strengthen the analytical nexus between identified resource concerns and proposed management actions**, ensuring that every proposed closure is supported by route-specific documentation demonstrating measurable impacts, evaluation of reasonable alternatives, consideration of mitigation measures, and a clear explanation of why less restrictive management approaches would be insufficient.
- **Recognize designated transportation systems as conservation infrastructure** that facilitate resource protection by concentrating public use, reducing unauthorized travel, improving monitoring, simplifying maintenance, supporting restoration, and enhancing public education and compliance.
- **Prioritize active management over permanent closure**, utilizing engineering improvements, maintenance, drainage stabilization, seasonal management, visitor education, route hardening, restoration, law enforcement, and volunteer stewardship before considering elimination of lawful public access.
- **Expand implementation commitments** by establishing measurable monitoring protocols, objective performance indicators, periodic public reporting, adaptive management thresholds, and scheduled five-year reviews to evaluate whether



management objectives are being achieved and whether future route modifications or reopenings are warranted.

- **Protect sensitive resources through targeted, science-based management**, including wildlife habitat, cultural resources, riparian systems, ACECs, Wilderness Study Areas, Lands with Wilderness Characteristics, and watershed resources, while recognizing that the mere presence of sensitive resources adjacent to existing routes does not independently demonstrate that continued managed use is incompatible with long-term conservation.
- **Maintain transportation continuity necessary for public safety, emergency response, search and rescue, wildfire suppression, administrative access, county transportation systems, SITLA access, valid existing rights, and recreation accessibility**, recognizing that resilient transportation networks provide benefits extending well beyond motorized recreation.
- **Fully recognize outdoor recreation as a congressionally protected principal use of the public lands under FLPMA**, giving appropriate consideration to its economic, cultural, educational, and stewardship values alongside biological, physical, and cultural resource objectives.
- **Expand formal partnerships with recreation organizations and local governments** to support implementation through volunteer maintenance, monitoring, restoration, route signing, public education, and long-term stewardship; revise the partnership agreement process as needed to minimize red tape and facilitate of access for volunteers to collaborate with the BLM.

Collectively, these recommendations do not seek to diminish the Bureau's responsibility to conserve sensitive public resources. Rather, they seek to strengthen the Final TMP by ensuring that transportation decisions remain proportional, scientifically supported, legally defensible, operationally sustainable, and fully consistent with Congress's multiple-use framework. The resulting transportation system should remain capable of adapting to changing environmental conditions while preserving meaningful opportunities for present and future generations to responsibly experience and steward the remarkable public lands within the Dinosaur North TMA.

CLOSING

UPLA appreciates the BLM's commitment to conducting a comprehensive and transparent planning process for the Dinosaur North TMP. The Vernal Field Office has assembled an extensive administrative record, completed substantial interdisciplinary analysis, and developed a Draft EA that reflects meaningful progress toward a modern, systems-oriented approach to



travel management. We commend the planning team for recognizing the importance of transportation connectivity, adaptive management, recreation access, and multiple-use stewardship throughout much of the analysis.

At its core, however, this planning effort presents a broader question than simply determining which individual roads should remain open or closed. It asks how the Bureau intends to manage nearly 345,000 acres of public lands entrusted to its stewardship under FLPMA. Congress did not direct the Bureau to maximize a single resource objective while minimizing all others. Rather, it directed the agency to exercise informed professional judgment in balancing recreation, conservation, watershed protection, wildlife habitat, cultural resources, grazing, scientific research, administrative access, public safety, and numerous other authorized uses in a manner that prevents unnecessary or undue degradation while preserving the enduring public values of federal lands. That statutory balance remains the central principle guiding UPLA's comments.

Throughout this letter, we have consistently demonstrated that **the overwhelming majority of resource concerns identified within the Draft EA are capable of being addressed through active management rather than permanent elimination of existing public access.** The scientific literature, the Bureau's own implementation framework, and decades of successful public land management collectively support an approach founded upon monitoring, maintenance, engineering improvements, restoration, education, volunteer stewardship, adaptive management, and evidence-based decisionmaking. Such an approach not only protects sensitive resources, but also preserves the transportation network necessary to support recreation, emergency response, resource stewardship, county coordination, scientific research, and the many other congressionally authorized uses that depend upon sustainable public access.

UPLA therefore urges the Bureau to adopt a Modified Alternative D that retains the functional integrity of the existing transportation network while refining individual route designations where supported by route-specific analysis and the best available science. We further encourage the Bureau to view the Final Travel Management Plan not as the conclusion of the planning process, but as the beginning of an ongoing stewardship partnership among the BLM, cooperating agencies, local governments, Tribal Nations, recreation organizations, permittees, volunteers, researchers, and the recreating public. The long-term success of this plan will ultimately be measured not by the number of routes designated open or closed, but by whether the Bureau succeeds in conserving the exceptional natural and cultural resources of the Dinosaur North landscape while maintaining meaningful opportunities for the American public to responsibly experience, understand, and steward the lands they collectively own.



UPLA appreciates the opportunity to participate in this planning process and requests that these comments, together with all supporting references and cited authorities, be incorporated into the administrative record and fully addressed in the Final Environmental Assessment and associated decision documents. We look forward to continuing our longstanding partnership with the Vernal Field Office in implementing a transportation system that reflects sound science, balanced stewardship, and the enduring multiple-use mission established by Congress.

Utah Public Lands Alliance would like to be considered an interested public for the Dinosaur North Travel Management Plan. 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 Mike Lee, Congressman Blake Moore, Congressman Burgess Owens, Governor Spencer Cox, Redge Johnson, Laura Ault, UPLA Trustees and Members

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