



Date: July 22, 2026

BLM Paria River District
Kanab Field Office
Trail Canyon TMP EA
669 South HWY 89A
Kanab, Utah 84741

Via submission on ePlanning and email to: blm_ut_kn_mail@blm.gov

RE: **Trail Canyon Travel Management Plan**
NEPA Number: DOI-BLM-UT-P020-2026-0003-EA

Dear BLM Planning Team,

Utah Public Lands Alliance (UPLA) is writing to provide public comment on the [Trail Canyon 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 182,766 acres of BLM-administered lands encompassed by the Trail Canyon 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 Trail Canyon Travel Management Area (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 Utah Arizona ATV Club and Mike Reid.



TABLE OF CONTENTS

Topic	Page
Executive Summary	5
General Comments	7
FLPMA Multiple-Use Mandate	8
Recreation as a Principal Use of Public Lands	10
NEPA Requirements for Reasoned Decisionmaking	11
Travel Management Principles under 43 CFR Part 8340	14
Adaptive Management versus Permanent Closure	15
Existing Route Networks and Historical Reliance	17
Public Access, Equity, ADA, and Accessibility Considerations	18
Economic Importance of Motorized Recreation	20
Scientific Review of Resource Impact Assumptions	22
Wildlife Analysis	25
Vegetation Analysis	28
Soils and Erosion Analysis	30
Water Resources	33
Cultural Resources	35
ACECs	37
Wilderness Study Areas	39
Lands with Wilderness Characteristics	41
Wild and Scenic River Corridors	43
Visual Resource Management	45
Alternatives Analysis	48
• Alternative A	
• Alternative B	
• Alternative C	
• Alternative D	
• Recommended Modified Alternative D	
Route-Specific Analysis	63
• 11A: Canaan Mountain Access Spur	
• 11B: Canaan Mountain Access Spur	
• 11FC: Elephant Cove Loop Connector	
• TC1011: Elephant Cove Loop Connector	
• 17A: 17-to-10Z Connector	
• 19A: Warriors Walk Access	
• 18WSA: Barracks / Rock Creek Overlook	
• 20M: East Fork Overlook and Hunter Access	
• 20WSA: The Barracks Trail	



Topic	Page
• 25G: Broad Hollow / Shunesburg Mail Drop Spur • 28L: Barracks-Poverty-Zion Viewpoint Spur • 28WSA: Harris Mountain-Elephant Gap Connector • 31J: White Cliffs Access Spur • 32CC: Coral Pink West-Border Loop • 32X: Coral Pink West-Border Loop • 32Z: Coral Pink West-Border Loop • 32D: Coral Pink South Connector • 32E: Coral Pink West Connector • 40P: Harris Mountain Challenge Connector • 40Q: Bay Bill / Zion Overlook • 40U: Dry Lake Return / Harris Mountain Challenge Route • 45F: Route 45-to-48 Connector • 51: Coral Pink Overlook and Rock-Art Route • 52: Hell Dive Loop Connector • 53: Fredonia Municipal Water Access Road • 60G: Route 60-to-60H Connector • 61A: Peekaboo Staging Area Connector • 70C: Route 70B-to-70D Scenic Connector • 70WSA: Poverty Canyon Scenic Route • 72D: Mineral Gulch Access • 73Q: Route 73 West-Side Loop • 91: Bull Hollow / Zion Ponderosa Access • 91NA: Bull Hollow Connector • 91DNA: Englestead Hollow / Orderville Viewpoint Spur • 92X: North Fork Hunter and Connector Route • 93: Zion Narrows / Private-Property Access • HC7: Hog Canyon Route Identifier Submitted by a Member	
Deficiencies within the EA	100
Recommended Modifications to Alternative D	108
Monitoring and Adaptive Management Framework	113
Volunteer Stewardship Partnership	118
Implementation Recommendations	119
Closing	124
Summary of Requested Actions	127
References	129



EXECUTIVE SUMMARY

UPLA generally supports the Bureau's decision to revisit travel management within the Trail Canyon TMA pursuant to the 2017 settlement agreement and recognizes the substantial effort undertaken by the Kanab Field Office to inventory existing routes, evaluate resource conditions, and develop a range of management alternatives. We further acknowledge that responsible travel management is an essential component of sound public land stewardship and that travel planning should strive to protect sensitive resources while preserving reasonable public access consistent with the Federal Land Policy and Management Act (FLPMA), the National Environmental Policy Act (NEPA), and the Bureau's multiple-use and sustained-yield mandate.

However, UPLA cannot support the Environmental Assessment as presently drafted. Although Alternative D represents the strongest foundation among the alternatives considered, it nevertheless proposes closure of numerous existing, historically established routes that continue to provide significant recreational, administrative, economic, public safety, and access functions without adequate demonstration that permanent closure constitutes the least restrictive or most scientifically justified management response. Throughout the Draft EA, the Bureau repeatedly concludes that route closures would reduce potential impacts to environmental resources, yet the administrative record frequently fails to establish a rational connection between those generalized assumptions and measurable, route-specific impacts that cannot instead be addressed through adaptive management, targeted mitigation, education, enforcement, seasonal limitations, engineering improvements, or restoration measures.

Accordingly, UPLA supports a **Modified Alternative D** that retains the overall management framework proposed by the Bureau while reopening or retaining numerous routes that have been recommended for closure where the record demonstrates ongoing public purpose, historical use, recreational importance, administrative necessity, emergency access value, or connectivity within the broader transportation network. This modified alternative would better satisfy FLPMA's requirement that public lands be managed for multiple use and sustained yield while simultaneously providing meaningful protection for cultural resources, wildlife habitat, special status species, Areas of Critical Environmental Concern (ACECs), Wilderness Study Areas (WSAs), Wild and Scenic River corridors, visual resources, soils, watersheds, and other sensitive resources through active management rather than unnecessary elimination of public access. UPLA further submits that several aspects of the Draft EA warrant reconsideration before issuance of a Finding of No Significant Impact (FONSI). Specifically, the Bureau should:

- Reevaluate closure recommendations that rely upon generalized resource concerns rather than documented, route-specific impacts.



- Fully evaluate adaptive management measures as viable alternatives to permanent closure.
- Better quantify the cumulative effects of eliminating recreational access throughout the Trail Canyon TMA.
- Give substantially greater weight to the statutory status of outdoor recreation as one of the principal uses of the public lands.
- More fully evaluate impacts to dispersed camping, hunting access, sightseeing, photography, family recreation, equestrian access, search and rescue, wildfire suppression, livestock management, State Trust Land access, county transportation networks, and local tourism economies.
- Modify Alternative D to retain additional historically established routes that continue to serve legitimate public purposes while implementing site-specific mitigation where necessary.

UPLA emphasizes that these comments should not be interpreted as opposition to responsible conservation. To the contrary, our organization has consistently advocated for active stewardship of Utah's public lands through volunteer trail maintenance, route restoration, habitat improvement projects, cultural resource protection, public education, responsible recreation ethics, and collaborative partnerships with federal, state, county, tribal, and nonprofit organizations. We strongly support conservation where supported by credible science and effective management practices. We oppose only those restrictions that unnecessarily diminish public access without corresponding evidence that closure is necessary to achieve measurable resource protection.

The Trail Canyon TMA represents one of southern Utah's most diverse public landscapes, supporting world-class motorized and non-motorized recreation alongside wildlife habitat, cultural resources, livestock grazing, hunting, watershed protection, scientific research, tourism, and numerous other public values expressly recognized under federal law. These resources are not mutually exclusive. The history of the Kanab Field Office demonstrates that careful planning, adaptive management, volunteer stewardship, and targeted mitigation can successfully protect sensitive resources while preserving broad public access.

UPLA urges the Bureau to use this planning effort to demonstrate that conservation and recreation are complementary, not competing, objectives. By adopting a Modified Alternative D that emphasizes evidence-based management over unnecessary closures, the Bureau can better fulfill its statutory responsibilities under FLPMA while preserving the outstanding recreational opportunities that make the Trail Canyon landscape one of the premier public land destinations in the American Southwest.



GENERAL COMMENTS

UPLA supports the Bureau's decision to develop a new Travel Management Plan for the Trail Canyon Travel Management Area pursuant to the 2017 settlement agreement and acknowledges that periodic reevaluation of designated transportation networks is both appropriate and necessary as land use patterns, recreation demands, scientific understanding, and management priorities evolve over time. The objective of travel management should not be to preserve historic route networks without modification, nor should it be to systematically reduce public access wherever environmental resources are present. Rather, travel management should seek to achieve an appropriate equilibrium between resource conservation and continued public access and enjoyment of the lands Congress has directed the Bureau to manage for multiple use.

The Draft Environmental Assessment (EA) correctly recognizes that the Trail Canyon TMA supports a remarkable diversity of resource values, including Areas of Critical Environmental Concern, Wilderness Study Areas, Wild and Scenic River corridors, sensitive plant communities, special status wildlife, archaeological resources, scenic landscapes, livestock grazing, and nationally significant recreational opportunities. Importantly, the EA also acknowledges that the transportation network serves numerous legitimate public purposes extending well beyond motorized recreation, including access to dispersed camping, scenic destinations, recreation sites, State Trust Lands, range improvements, mining operations, and administrative facilities. This recognition is significant because it demonstrates that route designation decisions inevitably affect a wide range of public interests. Every route proposed for closure represents more than a line on a map. It represents an access corridor that facilitates emergency response, wildfire suppression, scientific research, grazing administration, recreational opportunity, visitor dispersion, economic activity, cultural interpretation, or accessibility for elderly and mobility-impaired visitors. Consequently, **closure decisions should be approached with substantial caution and supported by clear evidence demonstrating that less restrictive management measures cannot adequately protect the resources at issue.**

Throughout the Draft EA, the Bureau generally concludes that alternatives involving greater route closures produce correspondingly greater environmental benefits. While this relationship may create an appearance of being intuitively reasonable, it does not establish nor substantiate that closure is the most appropriate management response. NEPA requires agencies to evaluate reasonable alternatives and to articulate a rational connection between the facts found and the decisions made. Simply demonstrating that fewer routes produce fewer opportunities for motorized travel does not establish that permanent closure is necessary where mitigation, improved maintenance, visitor education, enforcement, engineering treatments, seasonal



restrictions, or adaptive monitoring could achieve comparable resource protection while preserving public access.

UPLA is particularly encouraged by the Implementation Guide accompanying the Draft EA, which outlines comprehensive approaches involving signage, maintenance, monitoring, education, enforcement, and adaptive management. These measures illustrate precisely the type of management framework that should receive greater emphasis throughout the planning process. The existence of such management tools demonstrates that permanent closure need not become the Bureau's default response whenever resource concerns are identified. Instead, **closure should remain an option of last resort after reasonable management alternatives have been fully evaluated and determined inadequate.**

The organization likewise appreciates that the Bureau expressly acknowledges that the final decision may consist of modifications or combinations of the alternatives presented within the EA. UPLA strongly encourages the Bureau to exercise that discretion by developing a Modified Alternative D that preserves the strengths of Alternative D while retaining additional routes that continue to provide meaningful public benefits and for which the administrative record does not demonstrate unavoidable resource conflicts.

Travel management should be viewed as an adaptive, iterative process rather than a permanent exercise in route elimination. Recreational demand, environmental conditions, restoration success, monitoring results, wildfire disturbances, invasive species distributions, and visitor use patterns all change over time. Accordingly, the transportation network should likewise retain sufficient flexibility to respond to new information through adaptive management rather than irreversible closure decisions unsupported by evolving science.

FLPMA MULTIPLE-USE MANDATE

The Federal Land Policy and Management Act (FLPMA) of 1976 establishes the fundamental legal framework governing management of the public lands administered by the Bureau of Land Management. Congress declared that public lands remain in the collective ownership of all citizens of the USA, and must be managed under principles of multiple use and sustained yield unless disposal serves the national interest (43 U.S.C. §§ 1701-1787). Recreation occupies a central role within that statutory framework and is not subordinate to conservation, preservation, or any other individual resource objective.

FLPMA defines "multiple use" as management that balances diverse resource values while making the most judicious use of the land for present and future generations. Congress expressly



directed the Bureau to consider "recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific and historical values" in an integrated manner (43 U.S.C. § 1702(c)). The statute intentionally avoids establishing a hierarchy among these values. Instead, Congress required the Bureau to balance competing interests through professional judgment informed by science, public participation, and sound land management principles. This statutory directive has profound implications for travel management planning. Transportation networks constitute the infrastructure through which the public exercises its congressionally protected ability to utilize public lands for the diverse purposes identified within FLPMA. Elimination of access therefore affects not only motorized recreation but also hiking, horseback riding, hunting, photography, camping, wildlife observation, scientific research, grazing administration, mineral development, emergency response, and numerous additional land uses expressly protected under federal law.

Federal courts have consistently recognized that FLPMA requires agencies to balance multiple competing interests rather than maximize any single resource objective. Although the Bureau possesses broad discretion in implementing land management decisions, that discretion must remain faithful to Congress's directive that public lands serve multiple uses rather than evolving toward de facto single-purpose management. *Norton v. Southern Utah Wilderness Alliance*, 542 U.S. 55 (2004), reaffirmed that FLPMA establishes a broad management framework requiring agencies to exercise discretion consistent with approved land use plans and statutory direction rather than treating any individual management objective as paramount.

The Draft EA correctly acknowledges that FLPMA provides the legal authority and necessity for development of the Trail Canyon Travel Management Plan. However, several portions of the analysis appear to place disproportionate emphasis upon incremental reductions in potential environmental disturbance while affording comparatively less analytical weight to the corresponding reductions in recreational opportunity, transportation connectivity, visitor accessibility, economic activity, and public enjoyment of the lands. We call your attention to the fact that this analytical imbalance risks undermining FLPMA's central purpose. Congress did not instruct the Bureau to maximize resource protection regardless of its effects upon public access. Rather, Congress required balanced management that simultaneously conserves resources while providing meaningful opportunities for public use and enjoyment. These objectives are entirely compatible. Properly maintained routes, informed visitors, effective enforcement, and adaptive monitoring consistently achieve resource protection without requiring permanent elimination of access.

Moreover, the statutory concept of sustained yield extends beyond natural resources to encompass the long-term availability of recreational opportunities themselves. Recreation cannot



remain a sustained public benefit if access corridors are systematically reduced absent compelling evidence demonstrating that closure constitutes the only practicable management solution. As recreational demand continues to increase throughout the American West, preserving a diverse and resilient transportation network becomes increasingly important to dispersing visitor use, reducing concentrated impacts, and maintaining high-quality recreational experiences.

The Bureau therefore should evaluate every proposed closure through the lens of FLPMA's multiple-use mandate by asking not only whether closure may reduce environmental disturbance, but also whether closure unnecessarily diminishes congressionally protected recreational opportunities that could instead be preserved through less restrictive management strategies.

RECREATION AS A PRINCIPAL USE OF PUBLIC LANDS

Outdoor recreation is not merely one of many discretionary activities occurring upon public lands; it is one of the principal purposes for which Congress directed the Bureau of Land Management to administer them. FLPMA expressly identifies recreation among the primary values comprising multiple use (43 U.S.C. § 1702(c)), while subsequent legislation (including the National Landscape Conservation System Act, the John D. Dingell, Jr. Conservation, Management, and Recreation Act of 2019, the EXPLORE Act, and numerous appropriations measures) has repeatedly reaffirmed Congress's intent that federal lands provide abundant recreational opportunities for the American public.

The Trail Canyon TMA exemplifies this congressional vision. The Draft EA identifies an extensive network of recreation destinations accessed by the existing transportation system, including dispersed camping opportunities, scenic viewpoints, trailheads, OHV opportunities, hiking destinations, equestrian routes, wildlife viewing areas, geological features, archaeological sites, and Special Recreation Management Areas. The transportation network is therefore not merely incidental infrastructure; it is the essential mechanism through which the public experiences and enjoys the landscape itself.

Motorized access occupies a particularly important role within this recreational framework because it enables participation by populations that would otherwise be excluded from many of these public lands. Older Americans, veterans, individuals with disabilities, families with young children, and visitors possessing limited physical mobility frequently rely upon motorized transportation to reach dispersed campsites, scenic overlooks, trailheads, fishing areas, hunting units, and other public destinations. Route closures therefore produce consequences extending



well beyond OHV recreation by reducing accessibility for substantial segments of the American public.

Modern recreation science likewise demonstrates that sustainable recreation and conservation are not inherently incompatible. Numerous peer-reviewed studies conclude that recreational impacts are influenced primarily by management quality, visitor behavior, route design, maintenance standards, enforcement, and environmental context rather than the mere existence of designated transportation corridors (Marion & Wimpey, 2017; Leung & Marion, 2000; Hammitt, Cole, & Monz, 2015). Properly managed designated routes frequently reduce landscape-scale impacts by concentrating travel within durable corridors while discouraging creation of unauthorized routes across previously undisturbed terrain.

The Bureau's own planning history reflects this principle. The 2008 Kanab Resource Management Plan dramatically reduced cross-country travel by designating 98% of the planning area as limited to designated routes, thereby concentrating motorized use within an established transportation network and substantially reducing the widespread resource disturbance historically associated with unrestricted travel. The present planning effort therefore concerns refinement of an already designated route system rather than elimination of unmanaged cross-country travel. This distinction is important because the environmental baseline differs fundamentally from that which existed before designation. Today's management question is not whether motorized travel should occur on designated routes. Congress, the Bureau, and the public have long answered that question affirmatively. Rather, the question is which designated routes should remain available to satisfy the multiple recreational, administrative, economic, and public purposes documented throughout the administrative record.

Recreation should therefore receive analytical consideration commensurate with its statutory status as a principal use of public lands. Route closures should not be presumed environmentally preferable merely because they reduce opportunities for travel. Instead, the Bureau should carefully weigh the substantial public benefits associated with maintaining access alongside any demonstrated environmental concerns and employ the least restrictive management measures capable of protecting affected resources while preserving the broadest practicable range of recreational opportunities consistent with FLPMA and the Bureau's multiple-use mission.

NEPA REQUIREMENTS FOR REASONED DECISIONMAKING

The National Environmental Policy Act (NEPA), 42 U.S.C. §§ 4321-4370h, establishes a procedural framework intended to ensure that federal agencies make informed, transparent, and rational decisions after fully considering the environmental, social, economic, and recreational



consequences of proposed federal actions. NEPA is fundamentally a decision-making statute, not simply a documentation requirement. The purpose of an EA is not merely to compare alternatives but to provide the decisionmaker and the public with sufficient information to understand the actual consequences of each management approach and to determine whether the proposed action represents the most appropriate balance among the full range of public interests.

NEPA requires agencies to employ high-quality information, ensure scientific integrity, accurately disclose environmental effects, evaluate reasonable alternatives, and respond meaningfully to substantive public comments. Courts have consistently interpreted NEPA as requiring agencies to articulate a rational connection between the evidence contained within the administrative record and the conclusions ultimately reached. An agency may not rely upon generalized assumptions, unsupported speculation, or conclusory statements where substantial evidence is lacking. Rather, it must demonstrate that the facts contained within the record reasonably support the management decision being proposed (*Motor Vehicle Manufacturers Association v. State Farm Mutual Automobile Insurance Co.*, 463 U.S. 29, 1983; *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 1989).

UPLA appreciates the substantial effort invested by the BLM in preparing the Trail Canyon TMP EA. The Draft EA contains an extensive inventory of routes, evaluates a broad spectrum of environmental resources, and compares four management alternatives across numerous resource categories. This represents a significant analytical undertaking and provides a useful foundation for informed public participation. Nevertheless, several aspects of the analysis warrant additional consideration before the Bureau issues a final decision. Throughout much of the Environmental Assessment, the analysis relies upon a recurring assumption that reducing the number of designated routes necessarily produces a proportional improvement in environmental conditions. While this proposition may appear intuitively reasonable, it is not, by itself, sufficient to justify closure of individual routes under NEPA. **The relevant inquiry is not whether fewer routes produce less opportunity for disturbance in the abstract; rather, the inquiry is whether closure of a particular route is necessary because documented resource impacts cannot reasonably be addressed through less restrictive management measures.**

This distinction is critically important because many of the resource analyses presented within the Draft EA evaluate route density, route proximity to resources, or route presence within mapped habitat rather than documenting measurable degradation attributable to use of specific routes. For example, the EA frequently compares the number of route miles intersecting wildlife habitat, visual resource classes, wilderness study areas, riparian corridors, or special designation boundaries. While these spatial analyses provide useful planning information, they do not establish nor demonstrate that continued use of a given route is producing measurable adverse



effects requiring permanent closure. Presence within mapped habitat is not synonymous with demonstrated ecological impairment, just as route proximity to a resource does not automatically establish unacceptable impacts.

NEPA requires agencies to distinguish between potential effects and probable effects. It likewise requires agencies to disclose uncertainty and explain why particular assumptions are appropriate in light of available scientific information. Where uncertainties remain, adaptive management, monitoring, and mitigation frequently provide more appropriate responses than irreversible restrictions based primarily upon predictive modeling. The Supreme Court has emphasized that NEPA's principal function is to ensure that agencies take a "hard look" at environmental consequences before making decisions (*Kleppe v. Sierra Club*, 427 U.S. 390, 1976; *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 1989). A hard look requires more than cataloging environmental resources; it requires meaningful evaluation of whether proposed management actions are proportional to the actual risks identified.

We are also concerned that the Draft EA gives comparatively less analytical attention to the adverse consequences associated with route closures than it gives to the environmental benefits attributed to those closures. Throughout the document, route closures are frequently described as reducing potential impacts to vegetation, wildlife, soils, visual resources, or wilderness characteristics. Conversely, the corresponding losses of recreational opportunity, reductions in transportation connectivity, diminished visitor dispersion, decreased accessibility, increased user crowding, effects upon local economies, impacts to emergency response capability, and reductions in recreational resilience often receive comparatively brief discussion. Although Appendix B acknowledges socioeconomic considerations and recreation economics, these public values deserve substantially greater weight throughout the comparative alternatives analysis.

The Bureau should also recognize that transportation networks function as integrated systems rather than isolated routes. Closure of a single route may eliminate access to multiple recreation destinations, reduce opportunities for loop travel, increase congestion elsewhere in the network, lengthen emergency response times, or shift recreational use onto routes that possess greater environmental sensitivity than those being eliminated. NEPA requires consideration of these indirect and cumulative consequences as part of the agency's overall evaluation.

Finally, NEPA is intended to improve agency decisionmaking, not simply defend predetermined outcomes. The Draft EA expressly acknowledges that the Authorized Officer may adopt a modified alternative or combination of alternatives rather than selecting one alternative in its entirety. We urge the Bureau to exercise this flexibility by developing a Modified Alternative D that incorporates the strongest conservation elements of Alternative D while retaining numerous



routes whose continued public benefits substantially outweigh speculative or manageable environmental concerns.

TRAVEL MANAGEMENT PRINCIPLES UNDER 43 CFR PART 8340

The Bureau's authority to designate routes for off-highway vehicle (OHV) use derives principally from FLPMA, Executive authorities historically implemented through 43 C.F.R. Part 8340, applicable Resource Management Plans, and subsequent travel management decisions. Although the Trail Canyon TMP is being prepared pursuant to the 2017 settlement agreement and the 2008 Kanab Resource Management Plan, it remains essential that the Bureau faithfully apply the regulatory framework governing travel management.

The governing regulations establish a balanced framework for managing motorized recreation rather than a presumption favoring progressive route elimination. Specifically, 43 C.F.R. § 8342.1 directs the Bureau to designate areas and trails for OHV use in a manner that:

- Protects the resources of the public lands;
- Promotes the safety of all users of those lands; and
- Minimizes conflicts among the various uses of those lands.

These three directives are coequal management objectives. The regulation does not elevate one objective above another, nor does it require agencies to maximize restrictions whenever resource concerns are identified. Instead, it contemplates balanced management in which conservation, recreation, public safety, and multiple use are integrated through thoughtful planning.

Historically, the Bureau has sometimes interpreted the regulatory concept of "minimization" as favoring route elimination whenever any opportunity exists to reduce route mileage. Such an interpretation is inconsistent with both the plain language of the regulation and the broader statutory framework established by FLPMA. The purpose of minimization is to reduce unnecessary impacts, not to minimize recreational opportunity itself.

Recent federal policy developments reinforce this interpretation. The rescission of Executive Orders 11644 and 11989 through the Presidential Executive Order *Removing Unnecessary and Counterproductive Restrictions on Access to Federal Lands* reflects an explicit policy determination that federal land management agencies should no longer employ outdated executive directives as a basis for unnecessarily restricting public access where balanced multiple-use management can achieve appropriate resource protection. Although the underlying regulatory framework of 43 C.F.R. Part 8340 remains applicable unless amended through rulemaking, the rescission of the Executive Orders significantly diminishes any policy rationale favoring closure solely to reduce route density or satisfy abstract minimization objectives. Accordingly, the Bureau should interpret 43 C.F.R. § 8342.1 consistent with FLPMA's multiple-



use mandate and current federal policy by recognizing that minimization can frequently be achieved through management techniques that preserve access rather than eliminate it.

The Draft EA itself recognizes this principle by proposing a comprehensive implementation strategy involving education, monitoring, route maintenance, signage, enforcement, restoration, and adaptive management. These management tools directly advance the objectives identified within 43 C.F.R. § 8342.1 by reducing resource impacts while preserving recreational opportunity. Moreover, travel management planning should recognize that designated routes function as conservation tools. By concentrating travel onto established corridors, agencies reduce incentives for users to create unauthorized routes, facilitate effective maintenance, improve visitor education, simplify enforcement, and provide predictable recreational experiences. Properly designated and maintained transportation systems therefore frequently reduce landscape-scale disturbance compared to fragmented networks characterized by unnecessary closures and displaced recreational use.

The Bureau should also recognize that travel management regulations contemplate ongoing management rather than static transportation systems. Environmental conditions change. Recreational demand changes. Wildfire, flooding, vegetation succession, restoration projects, invasive species, and scientific understanding likewise evolve over time. Consequently, route management should remain flexible enough to respond to changing circumstances without defaulting to permanent closure whenever resource concerns emerge.

For these reasons, UPLA urges the Bureau to apply 43 C.F.R. § 8342.1 as Congress intended: as a balanced management directive requiring careful integration of conservation, recreation, public safety, and multiple use rather than as a mechanism for systematically reducing access across public lands.

ADAPTIVE MANAGEMENT VERSUS PERMANENT CLOSURE

One of the most significant policy questions presented by the Trail Canyon TMP concerns not whether resource protection is warranted, but rather how resource protection should be achieved. Throughout the Draft EA, the Bureau frequently identifies permanent route closure as the principal means of reducing potential impacts to wildlife habitat, vegetation, cultural resources, visual resources, soils, riparian areas, wilderness study areas, and other environmental values. While closure undoubtedly reduces the possibility of future motorized use, it should not be presumed to represent the preferred or most appropriate management response in every circumstance.



Modern public land management increasingly recognizes adaptive management as a superior framework for addressing environmental uncertainty. Adaptive management acknowledges that ecological systems are dynamic, scientific understanding evolves, and management actions should likewise evolve in response to observed conditions rather than static assumptions. Rather than treating closure as irreversible, adaptive management employs monitoring, performance standards, mitigation, education, restoration, and periodic reevaluation to ensure that management remains responsive to actual environmental outcomes.

The Bureau has already embraced this philosophy within the Implementation Guide accompanying the Draft EA. The Guide outlines robust programs for route monitoring, visitor education, maintenance, enforcement, signage, reclamation, and periodic evaluation. These components represent precisely the type of active stewardship that should receive greater emphasis within the selected alternative.

UPLA strongly supports development of a comprehensive adaptive management framework that incorporates:

- measurable resource thresholds;
- routine field monitoring;
- periodic route condition assessments;
- targeted engineering improvements;
- volunteer stewardship partnerships;
- seasonal or temporary restrictions where scientifically justified;
- restoration of localized resource damage;
- periodic review of route designations using updated scientific information.

Such an approach better reflects contemporary principles of ecosystem management while preserving the Bureau's ability to respond appropriately if future monitoring demonstrates that existing management measures prove insufficient.

Permanent closure, by contrast, should remain a management option of last resort. Closure may be appropriate where the administrative record clearly demonstrates ongoing resource degradation that cannot reasonably be mitigated through maintenance, engineering, education, enforcement, or seasonal management. However, closure should not become the default response merely because it produces the greatest reduction in theoretical disturbance.

Experience throughout the western United States demonstrates that properly managed designated routes can coexist successfully with sensitive wildlife habitat, cultural resources, recreational use, livestock grazing, hunting, dispersed camping, and numerous other land uses. Volunteer organizations, including UPLA and its affiliated clubs, have repeatedly demonstrated their



willingness to assist federal agencies with trail maintenance, restoration projects, erosion control, signage installation, visitor education, invasive species removal, and habitat enhancement. These partnerships represent valuable management resources that should be fully utilized before considering elimination of public access.

The Bureau should likewise recognize that permanent closures frequently produce unintended consequences. Concentrating users onto fewer routes increases congestion, intensifies localized impacts, reduces visitor dispersion, diminishes recreational quality, increases conflicts among user groups, and encourages unauthorized route creation where recreational demand remains unmet. Adaptive management, conversely, seeks to address environmental concerns while maintaining sufficient transportation capacity to distribute recreational use across the landscape.

We therefore recommend that the selected alternative include explicit adaptive management provisions requiring periodic review of route conditions and providing mechanisms for reopening routes where monitoring demonstrates that resource objectives can be achieved through less restrictive management approaches.

EXISTING ROUTE NETWORKS AND HISTORICAL RELIANCE

The transportation network evaluated within the Trail Canyon Travel Management Area is neither speculative nor newly established. The overwhelming majority of inventoried routes have existed upon the landscape for decades and represent the accumulated history of transportation, settlement, ranching, mineral exploration, public recreation, county road development, administrative access, and multiple-use land management throughout southern Utah. The Draft EA acknowledges that the 2008 Kanab Resource Management Plan designated approximately 449 miles of routes within the Trail Canyon TMA, subsequently increased to approximately 473 miles following recognition of adjudicated R.S. 2477 rights-of-way. The present planning effort evaluates approximately 469 miles of existing routes comprising nearly 600 route segments. Thus, the Bureau is not evaluating whether entirely new motorized opportunities should be created; rather, it is determining which components of an already established transportation system should remain available for continued public use.

This distinction carries important legal and practical implications.

Longstanding public use creates legitimate reliance interests that agencies must carefully consider before substantially altering existing access. Families have recreated along these routes for generations. Outfitters have incorporated them into business operations. Hunters depend upon them for seasonal access. Photographers, hikers, equestrians, dispersed campers, researchers,



ranchers, search and rescue organizations, and local residents likewise rely upon these transportation corridors as integral components of their public land experience. Longstanding use constitutes compelling evidence that many routes continue to serve meaningful public purposes. Before removing such routes from the designated transportation system, the Bureau must demonstrate not only that environmental concerns exist, but that those concerns cannot reasonably be addressed through less restrictive management approaches.

The Draft EA itself documents the substantial public functions served by the transportation network, including access to recreation destinations, Special Recreation Management Areas, State Trust Lands, grazing infrastructure, mining operations, private lands, and administrative facilities. These documented purposes establish that the transportation network provides significant benefits extending well beyond recreational driving.

Transportation connectivity also warrants particular consideration. Many routes operate collectively as integrated loop systems that distribute visitors across the landscape, reduce congestion, provide scenic diversity, facilitate emergency response, and improve visitor safety by offering alternate exit routes during wildfire, flooding, or mechanical failure. Closure of seemingly minor connector routes may therefore produce disproportionate effects upon the overall functionality of the transportation network.

We further call out the fact that many routes originated through legitimate historical uses including ranching operations, mining activities, county transportation systems, and administrative access. While historical origin alone does not determine future designation, it reinforces the fact that these corridors have long served multiple public purposes consistent with FLPMA's multiple-use mandate.

Accordingly, **UPLA recommends that the Bureau begin each route evaluation with a rebuttable presumption favoring continued designation of historically established routes unless the administrative record demonstrates that closure is both necessary and proportionate to documented resource concerns that cannot otherwise be effectively managed.**

PUBLIC ACCESS, EQUITY, ADA, AND ACCESSIBILITY CONSIDERATIONS

Federal public lands belong equally to every American. The Bureau therefore bears an important responsibility to ensure that management decisions preserve opportunities for broad public participation rather than unintentionally limiting access to only those individuals possessing exceptional physical ability, financial resources, or geographic proximity. Motorized



transportation plays an essential role in fulfilling this objective. Contrary to common misconceptions, designated OHV routes do not serve only OHV enthusiasts. They provide the transportation infrastructure through which millions of Americans access trailheads, dispersed campsites, scenic overlooks, fishing locations, hunting areas, archaeological sites, geological features, photography opportunities, and countless other recreational destinations. For many visitors, motorized access is not simply a matter of convenience; it is the only practical means of experiencing these public lands. Older Americans, veterans, individuals with mobility impairments, persons living with chronic medical conditions, families with young children, and visitors possessing limited physical endurance frequently depend upon designated motorized routes to reach locations that would otherwise remain inaccessible. Route closures therefore have disproportionate effects upon precisely those populations whose participation in outdoor recreation federal policy increasingly seeks to encourage.

The Architectural Barriers Act of 1968, the Rehabilitation Act of 1973, the Americans with Disabilities Act, Executive Order 13548, and numerous Department of the Interior accessibility policies collectively reflect longstanding federal commitments to expanding outdoor recreation opportunities for persons with disabilities. Although these authorities do not require motorized access to every public land destination, they do require agencies to thoughtfully consider accessibility implications when developing land management decisions. The Draft EA gives comparatively limited attention to these important equity considerations. While recreation opportunities are discussed throughout the document, relatively little analysis addresses how route closures may affect visitors whose physical abilities differ substantially from those of the average backcountry hiker or backpacker.

Accessibility also encompasses economic equity. Many families rely upon motorized recreation because it provides one of the most affordable means of enjoying public lands. Designated routes enable dispersed camping, family outings, wildlife viewing, photography, and sightseeing at costs substantially lower than many other recreational activities. Eliminating access therefore disproportionately affects lower-income households seeking affordable outdoor experiences.

Public safety represents an additional accessibility consideration. Designated routes facilitate search and rescue operations, wildfire response, emergency medical access, law enforcement patrols, vehicle recovery, and visitor evacuation during rapidly changing environmental conditions. Maintaining a resilient transportation network therefore enhances not only recreational opportunity but also the Bureau's ability to protect public health and safety.

UPLA asserts the exigence for the Bureau to expand its accessibility analysis within the Final EA by evaluating how each alternative affects elderly visitors, persons with disabilities, veterans,



economically disadvantaged families, dispersed campers, and other populations that depend upon motorized transportation to meaningfully experience their public lands.

Preserving reasonable motorized access is not inconsistent with conservation. Rather, it represents an essential component of equitable public land management that ensures America's public lands remain accessible to all Americans... not solely to those physically capable of reaching them by foot over long distances.

ECONOMIC IMPORTANCE OF MOTORIZED RECREATION

Outdoor recreation is a material component of Kane County's economic structure, and motorized access is part of the infrastructure that makes this economic activity possible. The Trail Canyon transportation network does not serve only persons whose principal activity is recreational vehicle travel. It also enables visitors to reach dispersed campsites, trailheads, hunting areas, scenic overlooks, geological features, cultural-resource destinations, climbing and canyoneering areas, equestrian staging locations, and other destinations from which a broad spectrum of motorized and non-motorized activities originates. Accordingly, the economic consequences of route designation cannot be measured solely by counting visitors who identify OHV use as their primary activity. The more relevant inquiry is how much recreation-based visitation and spending depend upon continued practical access through the motorized transportation network.

The Draft EA estimates that the Trail Canyon TMA received approximately **445,796 visitor days during fiscal year 2023**. Using 2022 IMPLAN data and visitor-spending profiles derived from National Visitor Use Monitoring information for the Dixie National Forest, the Bureau estimates that this visitation supported approximately **341 jobs**, generated approximately **\$9.49 million in labor income**, produced approximately **\$16.55 million in value added**, and contributed approximately **\$30.63 million in total economic output**. The Bureau further estimates that every additional 10,000 visitor days is associated with approximately **7.6 jobs**, **\$212,766 in labor income**, **\$371,206 in value added**, and **\$687,197 in total economic output**. These figures demonstrate that even relatively modest changes in visitation can produce measurable economic consequences for Kane County businesses, employees, and local governments.

These Trail Canyon-specific estimates are consistent with the Bureau's broader recognition that public-land recreation is a significant economic engine throughout Utah. BLM Utah has previously reported that recreation visits to Bureau-managed lands supported thousands of jobs and hundreds of millions of dollars in statewide economic activity, while the agency's national recreation strategy expressly recognizes that public-land visitation sustains lodging



establishments, restaurants, fuel retailers, outfitters, guides, repair businesses, tour operators, and other community services (Bureau of Land Management, 2015, 2021).

We are therefore concerned with the Draft EA’s assumption that overall visitation would remain unchanged under every alternative. The Bureau states that the economic contribution of recreation would be identical across Alternatives A through D because staff do not expect total visitor days to vary. That assumption materially predetermines the socioeconomic result. If visitation is held constant by assumption, the model cannot identify any economic difference caused by the closure of access routes, elimination of loop opportunities, loss of dispersed camping destinations, increased crowding, or deterioration in the quality and diversity of recreational experiences.

The conclusion that visitation will remain constant is not adequately supported merely because the total TMA acreage remains available for some form of public entry. Recreational demand is destination-specific, activity-specific, and experience-specific. A visitor seeking a four-wheel-drive loop, a dispersed campsite accessible by vehicle, a family sightseeing route, or motorized access to a hunting area cannot necessarily substitute a distant hiking trail or a shortened out-and-back road and obtain the same recreational product. Nor does the continued availability of one route compensate for closure of another where the closed route provides distinctive scenery, terrain, technical challenge, camping access, connectivity, or access for persons unable to travel substantial distances on foot.

The Draft EA itself acknowledges that Alternative D would preserve a level of OHV-facilitated access similar to Alternative A, provide greater access than Alternatives B and C, and reduce congestion on some routes by distributing use across a larger network. Those findings are economically relevant. A network that protects destination access, loop continuity, visitor dispersion, and variety is more likely to retain repeat visitation and encourage longer stays than a network that substantially reduces available experiences. The socioeconomic analysis should therefore distinguish among at least four separate effects:

1. The potential loss of visitor days caused by reduced motorized access or reduced recreational quality.
2. The redistribution of spending away from Kane County when users choose alternative destinations elsewhere in Utah, Arizona, or the broader region.
3. The reduction in trip duration where route closures eliminate loop opportunities, dispersed camping locations, or multi-day itineraries.
4. The effect upon businesses that depend disproportionately upon motorized visitors, including fuel stations, lodging establishments, restaurants, grocery stores, vehicle-repair businesses, equipment retailers, outfitters, guides, and event-related services.



The Bureau should also more fully evaluate nonmarket economic values. Its own socioeconomic guidance recognizes that recreation experiences possess substantial value even where no admission price or direct market transaction occurs. Scenic travel, hunting access, wildlife observation, family camping, cultural-resource appreciation, solitude, and the ability to revisit traditional destinations are economic benefits in the broader welfare sense, notwithstanding the absence of a posted market price (BLM, 2013). The Draft EA acknowledges these nonmarket values but does not quantify or meaningfully compare their potential loss across alternatives.

We recommend that the Final EA replace the unsupported assumption of invariant visitation with a sensitivity analysis. At minimum, the Bureau should calculate the economic consequences of percent reductions in visitor days under alternatives that eliminate substantial recreational access. Using the Bureau's own marginal estimates, such an analysis would transparently disclose the potential range of employment, income, value-added, and output losses. The Bureau should also analyze the economic benefits of a Modified Alternative D that retains a diverse, interconnected network and therefore provides the strongest opportunity to sustain or increase recreation-based visitation.

Ultimately, the issue is not whether every existing route generates an independently measurable amount of economic output. Transportation networks operate collectively. Their value arises through connectivity, destination access, visitor distribution, trip variety, and the cumulative ability to support multi-day recreation. The Bureau should recognize this network effect and avoid treating individual route closures as economically inconsequential merely because no single route has a cash register located at its terminus.

SCIENTIFIC REVIEW OF RESOURCE IMPACT ASSUMPTIONS

UPLA supports management decisions grounded in credible scientific evidence and does not dispute the general scientific proposition that poorly located, improperly maintained, or unauthorized motorized travel can affect soils, vegetation, wildlife, hydrology, and cultural resources. The scientific literature cited by the Bureau documents numerous potential impact mechanisms, including soil compaction, erosion, fugitive dust, vegetation crushing, invasive-plant dispersal, wildlife disturbance, and habitat alteration (Brooks & Lair, 2005; Ouren et al., 2007; Trombulak & Frissell, 2000). **The existence of these potential mechanisms, however, does not establish that every existing designated route causes a significant effect, that every route within mapped habitat materially degrades that habitat, or that permanent closure is the necessary response.**



The Draft EA frequently employs route mileage within or near mapped resource areas as a proxy for environmental effect. For special-status plants, the principal indicator is the number of route miles within or within 300 feet of modeled habitat. For wildlife, the analysis generally compares route mileage within broad habitat polygons. For soils, it compares route mileage mapped across fragile-soil units. These metrics may be useful as initial screening tools, but they are not substitutes for site-specific causation, exposure, intensity, or condition data.

A route's presence within a habitat model does not prove that the route intersects occupied habitat. Proximity within 300 feet does not demonstrate direct disturbance. Route mileage within a broad big-game habitat category does not disclose traffic volume, season of use, speed, existing vegetation screening, topographic separation, habituation, or whether the route predates the habitat designation by many decades. Likewise, a route crossing a soil-map unit labeled fragile does not demonstrate active erosion, sediment delivery, route widening, or irreversible soil degradation. The Bureau must distinguish **hazard** from **risk**. A potential impact mechanism is a hazard; actual risk depends upon exposure, probability, magnitude, duration, site condition, and the effectiveness of management controls.

The Draft EA's route evaluation methodology appears capable of supporting this more relevant inquiry. The Bureau states that its interdisciplinary team evaluated route characteristics, condition, connectivity, use level, recreational attractions, known conflicts, resource values, design features, and opportunities for avoidance or mitigation. The route reports therefore should contain the information necessary to distinguish routes presenting documented management problems from routes that merely overlap generalized resource layers. The Final EA should use those route-specific observations as the foundation for decisionmaking rather than relying predominantly upon aggregate mileage comparisons.

The difference is legally consequential. An agency acts arbitrarily when it relies upon factors that do not rationally establish the conclusion reached, fails to consider an important aspect of the problem, or offers an explanation inconsistent with the evidence before it (*Motor Vehicle Manufacturers Association v. State Farm Mutual Automobile Insurance Co.*, 463 U.S. 29, 43, 1983). Where the record establishes only the possibility of an effect, the Bureau should not characterize closure as scientifically necessary without explaining why route maintenance, drainage improvements, barriers, seasonal restrictions, public education, or monitoring would be insufficient.

The Bureau should also evaluate the age and context of the scientific literature it relies upon. Several broad reviews cited in the Draft EA synthesize impacts from a wide variety of activities, including unauthorized cross-country travel, military vehicle operations, high-intensity



recreation, road construction, and travel on previously undisturbed soils. Results drawn from those settings cannot automatically be applied to low-use, preexisting, two-track routes confined to established corridors. The Draft EA itself recognizes that unauthorized cross-country travel can disturb prey habitat, but the proposed action does not authorize cross-country travel. The Final EA should avoid conflating the effects of lawful use on an established route with the effects of route proliferation or travel outside designated corridors.

Scientific integrity also requires acknowledgment of countervailing evidence. The transportation network has been managed under a designated-route system since the 2008 RMP converted approximately 98% of the Kanab Field Office from open cross-country travel to travel limited to designated routes. The present analysis therefore concerns an existing, bounded network, not unrestricted vehicle use across an undisturbed landscape. The Bureau should analyze whether resource conditions have remained stable, improved, or declined during this period and whether any observed decline is actually attributable to use of particular routes.

Most significantly, the U.S. Fish and Wildlife Service's February 7, 2022 Biological Opinion concluded that the proposed travel-management action was not likely to jeopardize the continued existence of Mexican spotted owl, Jones cycladenia, Welsh's milkweed, or Siler pincushion cactus, and was not likely to adversely modify designated critical habitat for Mexican spotted owl or Welsh's milkweed. That conclusion does not foreclose route-specific conservation measures, but it substantially undermines any suggestion that extensive route closure is categorically necessary to avoid jeopardy or adverse modification.

We recommend that the Bureau apply the following analytical sequence to each resource concern:

- identify the resource actually present, rather than relying solely upon modeled suitability;
- document the route's current condition and level and season of use;
- identify measurable evidence of impact attributable to that route;
- determine the magnitude, duration, and geographic extent of the impact;
- evaluate targeted mitigation and monitoring;
- **impose permanent closure only where substantial evidence demonstrates that the impact is unacceptable and cannot be reduced through less restrictive management.**

This framework would not weaken environmental protection. It would improve scientific precision, concentrate limited management resources upon genuine problems, and preserve public support for conservation by ensuring that restrictions are demonstrably connected to conditions on the ground.



WILDLIFE ANALYSIS

The Trail Canyon TMA supports black bear, cougar, desert bighorn sheep, mule deer, Rocky Mountain elk, California condor, Mexican spotted owl, migratory birds, and numerous other wildlife species. UPLA supports the conservation of these species and recognizes that human activity can affect wildlife behavior and habitat use under certain circumstances. The relevant scientific and administrative question, however, is whether continued use of particular established routes produces effects of sufficient magnitude to require closure and whether those effects can be addressed through focused management.

General Wildlife and Big Game

The Draft EA evaluates the potential effects of route designations upon black bear, cougar, desert bighorn sheep, mule deer, and Rocky Mountain elk primarily by % comparing route mileage within mapped habitat. Under Alternative A, the Bureau reports that 95% of evaluated route mileage in black-bear habitat, 96% in cougar and mule-deer habitat, 75% in desert-bighorn habitat, and 95% in elk habitat would remain designated open. The analysis then identifies potential effects such as mortality, injury, behavioral modification, habitat alteration, and fragmentation. These percentages demonstrate extensive spatial overlap, but spatial overlap is not itself evidence of biological impairment. The habitats identified for wide-ranging species such as cougar, black bear, mule deer, and elk encompass substantial portions of the landscape. A route located within such a polygon does not necessarily fragment functional habitat in a biologically meaningful sense. The Bureau should distinguish between a paved highway or high-volume arterial corridor and a low-speed, low-use primitive road. These features do not create equivalent mortality risk, noise exposure, edge effects, or barriers to movement.

The Final EA should examine route-specific variables that materially influence wildlife response, including:

- average and peak traffic volume;
- vehicle speed and type;
- seasonal use;
- distance from nesting, denning, lambing, fawning, or winter-concentration areas;
- topography and vegetative screening;
- route width and maintenance condition;
- existing human development;
- availability of adjacent habitat;
- documented wildlife use before and after route designation;
- evidence of mortality, displacement, or reproductive effects.



Without those variables, **aggregate route mileage is an imprecise surrogate for ecological consequence.**

The analysis should also recognize that wildlife responses to recreation are species-specific and context-dependent. Some species exhibit temporary displacement near concentrated activity, while others habituate to predictable travel confined to established corridors. A designated route may produce less disturbance than dispersed pedestrian or cross-country use because vehicle movement is spatially predictable and concentrated. The relevant objective should be avoidance of sensitive locations during biologically consequential periods, not generalized reduction of route mileage across all mapped habitat.

For desert bighorn sheep, route-specific review should focus upon lambing areas, water sources, escape terrain, migration bottlenecks, and documented disturbance rather than broad habitat overlap alone. Seasonal restrictions, no-stopping zones, parking controls, educational signs, and enforcement against cross-country travel may address localized concerns without eliminating through-access.

For mule deer and elk, the Bureau should distinguish between general habitat and crucial seasonal ranges. Travel during severe winter conditions may warrant targeted management where documented disturbance could increase energetic stress. That does not justify year-round closure where the concern is temporally limited. Similarly, hunting access should not be treated solely as a disturbance mechanism. It is a principal recreation use and an important component of state wildlife-management programs.

For black bears and cougars, the Draft EA suggests that reducing human access may reduce encounters. That proposition may apply near den sites or concentrated attractants, but route closure is not necessarily the most effective means of preventing conflict. Food-storage education, waste control, campsite management, public information, enforcement, and temporary restrictions near an active den are more appropriate mitigations per the actual risk.

California Condor

The Draft EA evaluates approximately 14 miles of routes within the California condor experimental-population area. Under Alternative D, approximately 13 miles would remain open and approximately 0.2 mile would be closed, while Alternative B would retain approximately nine miles and close approximately five miles.

The use of an experimental-population boundary as an impact proxy requires significant caution. Such boundaries are often geographically broad and are not equivalent to occupied nesting,



roosting, or feeding sites. The Bureau should identify whether any route proposed for closure is located near an active nest, regular roost, or documented concentration area. It should also identify the specific exposure mechanism. The Draft EA refers generally to collision, noise, habitat effects, and effects upon prey, yet condors are scavengers rather than predators dependent upon the small-mammal prey base described elsewhere in the analysis. A route-specific condor assessment should focus upon actual condor ecology and documented risk pathways, including disturbance near active roosts or nests, attraction to human refuse, and potential exposure to contaminants.

Where a route is near an active condor use area, seasonal restrictions, stopping limitations, food and waste controls, speed management, and education may provide effective protection. The record should not presume that every mile within the experimental-population boundary generates equivalent risk.

Mexican Spotted Owl

The Draft EA reports that approximately 58 miles of evaluated routes occur within Mexican spotted owl critical habitat. Alternative D would retain approximately 55 miles as open and close approximately three miles; Alternative B would retain approximately 25 miles as open, designate approximately two miles limited, and close approximately 31 miles.

Critical habitat designation identifies areas containing physical or biological features relevant to conservation; it does not establish that every acre is occupied or that every existing route causes adverse modification. The Endangered Species Act requires a rational connection between the action and effects upon the species or designated habitat. The 2022 Biological Opinion concluded that the proposed action was not likely to jeopardize Mexican spotted owl or result in adverse modification of its critical habitat.

The Bureau should therefore avoid using critical-habitat overlap as an independent justification for extensive closure. It should identify known protected activity centers, nesting or roosting areas, breeding-season sensitivity, and the actual acoustic or behavioral effects associated with each route. Where a route approaches an occupied nest or protected activity center, seasonal limitations during the breeding period may be more defensible and effective than permanent year-round closure. Where no occupied site or measurable disturbance is documented, continued designation with monitoring is the more proportionate response.



Wildlife Recommendations

UPLA recommends that the Bureau:

- retain all routes in general wildlife habitat; resorting to route closure only if route-specific evidence explicitly demonstrates a material, unmitigable impact;
- distinguish broad habitat polygons from occupied, crucial, or seasonally sensitive areas;
- use seasonal restrictions where the concern is seasonal;
- establish monitoring thresholds tied to documented wildlife response;
- regulate stopping, staging, camping, waste, or speed where those activities create the actual risk;
- avoid equating route mileage with habitat loss or biological fragmentation without supporting evidence;
- incorporate the 2022 Biological Opinion's no-jeopardy and no-adverse-modification conclusions into the comparative analysis;
- include additional routes from Alternative A or D within the Modified Alternative D where wildlife concerns are speculative, geographically generalized, or where documented outcomes from mitigation have not yet been produced.

VEGETATION ANALYSIS

The Draft EA addresses both federally listed plants and broader native-vegetation concerns. The principal listed plants considered are Jones cycladenia and Siler pincushion cactus, with the 2022 Biological Opinion also addressing Welsh's milkweed. UPLA supports rigorous protection of known plant populations and recognizes that direct vehicle travel outside established routes can crush plants, disturb soils, spread weeds, and alter hydrologic conditions. Those concerns, however, must be analyzed in relation to the actual action under review: continued travel upon existing designated routes.

The Draft EA identifies potential effects from crushing, illegal collection, fugitive dust, soil compaction, erosion, weed introduction, hydrologic alteration, and destruction of biological soil crusts. It relies primarily upon the amount of route mileage located within or within 300 feet of modeled habitat as an indicator of potential effect. For Jones cycladenia, Alternative A would retain approximately 153 of 161 evaluated miles as open; Alternative D would retain approximately 149 miles open and close approximately 12 miles. For Siler pincushion cactus, Alternatives A and D would each retain approximately four miles open, with Alternative D closing approximately 0.4 mile. These figures reveal an important analytical issue. Alternative D's treatment of Siler pincushion cactus habitat is effectively similar to existing management, yet the Biological Opinion concludes that the proposed action is not likely to jeopardize the species. For Jones cycladenia, Alternative D retains most existing route mileage while still



receiving the same no-jeopardy conclusion. This supports a management approach focused upon known populations and site-specific conservation measures rather than wholesale closure based on modeled habitat proximity.

Modeled habitat is not interchangeable with occupied habitat. Habitat models are valuable screening tools, particularly for rare plants that may be difficult to survey comprehensively, but they inherently contain uncertainty. A route within 300 feet of modeled habitat may be separated from suitable microsites by topography, geology, vegetation, drainage, or previously disturbed terrain. Conversely, an occupied plant population may occur outside a coarse model. The scientifically appropriate response is field verification where management decisions materially depend upon assumed presence.

The Draft EA acknowledges that species-specific best management practices and conservation measures would be applied if future surveys locate listed plants. This commitment should be elevated from a general implementation statement into a clear decision standard. Before closing an established route because of a listed-plant concern, the Bureau should conduct an appropriate survey during the species' detectable period, map occupied habitat, identify the actual pathway of effect, and evaluate avoidance measures.

Potential mitigation may include minor route realignment within previously disturbed ground, delineators or barriers preventing route widening, prohibition of roadside parking or camping near occupied plants, hardened turnouts, drainage controls, speed reductions to limit dust, weed inspection and treatment, and seasonal maintenance restrictions. Where a population occurs immediately adjacent to a route, fencing or visually unobtrusive barriers may prevent crushing without eliminating public passage.

The Bureau should likewise distinguish between authorized travel on the route tread and unauthorized activity outside the route. Several effects identified in the Draft EA, particularly direct crushing and destruction of vegetation, are principally associated with cross-country travel, route braiding, parking outside designated areas, or route widening. Those activities are already prohibited or subject to management. Closing a lawful route because some users may violate existing rules is not a substitute for signing, engineering, education, and enforcement.

Fugitive dust should also be addressed proportionately. Dust can affect plant physiological processes under sufficiently high deposition conditions, but the existence and magnitude of that effect depend upon traffic volume, soil texture, vehicle speed, wind, distance, precipitation, and plant morphology. The Draft EA does not establish that every route within 300 feet of modeled



habitat generates harmful dust loading. A route-specific analysis should identify evidence of visible dust deposition or plant impairment before relying upon dust as a closure rationale.

Broader native-vegetation impacts are discussed only briefly as an issue not analyzed in detail. That treatment should not become a basis for unsupported route closure elsewhere in the decision. Wildfire, drought, livestock use, invasive species, precipitation variability, vegetation treatments, and natural erosion may exert substantial influence upon vegetation condition. The Bureau must avoid attributing vegetation trends to motorized travel without separating these confounding causes.

Weed management presents a similar concern. Vehicles can transport seeds, but routes also provide access for weed detection, treatment, firefighting, restoration, and monitoring. Closure does not eliminate invasive species already present, and reclamation disturbance itself may create establishment opportunities unless carefully managed. A credible weed strategy should emphasize early detection, targeted treatment, cleaning protocols for agency and contractor equipment, use of certified weed-free materials, and rapid revegetation of disturbed sites.

We recommend that the Modified Alternative D retain established routes through modeled plant habitat unless field surveys document occupied plants and the Bureau demonstrates that avoidance or mitigation is infeasible. Known populations should receive stringent, enforceable protection, but the presence of generalized modeled habitat should trigger investigation and management, not an automatic presumption of closure.

SOILS AND EROSION ANALYSIS

Soil stability is an essential component of watershed health, native vegetation, biological soil crust integrity, route sustainability, and long-term recreation access. UPLA supports focused action where routes exhibit active gullyng, sediment delivery, severe rutting, uncontrolled widening, or recurring damage during wet conditions. Sustainable route management requires drainage maintenance, erosion control, appropriate surfacing, and periodic rehabilitation. It does not, however, require closure of stable existing routes merely because they overlap a generalized fragile-soil map.

The Draft EA states that approximately three miles of evaluated routes occur within areas mapped as fragile soils, principally in the North Fork area. Alternative A would retain 2.7 miles open, Alternative B 2.3 miles, and Alternatives C and D 2.6 miles. Thus, the difference between Alternative A and Alternative D is only **0.1 mile**, and the difference between Alternative B and Alternative D is **0.3 mile**. This limited numerical difference does not support a generalized



conclusion that Alternative D presents materially greater landscape-scale soil risk. It instead demonstrates that fragile-soil concerns are geographically concentrated and readily susceptible to route-specific treatment. The Bureau should identify the exact segments involved, their current condition, slope, soil texture, drainage configuration, traffic level, evidence of sediment movement, and proximity to receiving waters.

The Draft EA identifies possible effects including compaction, reduced infiltration, rutting during wet periods, erosion, sedimentation, and dust deposition. These mechanisms are scientifically plausible, but their severity is highly dependent upon route design and maintenance. A properly crowned or outsloped route with functioning drainage structures may shed water without concentrating erosive flow. Conversely, an abandoned or closed route may continue to channel runoff unless it is actively recontoured and stabilized. Designation status alone therefore does not determine erosion risk. The Bureau's Implementation Guide contemplates grading, installation of water-control structures, surfacing, barriers, monitoring, and route reclamation. These are not ancillary measures; they are the principal means by which route-related soil effects should be controlled. The Final EA should evaluate their likely effectiveness before assuming that closure is necessary.

For routes on erodible soils, available management measures include:

- rolling dips, water bars, lead-off ditches, and grade reversals;
- outsloping or crowning where appropriate;
- hardened stream approaches and crossings;
- aggregate or other suitable surfacing on short problem segments;
- stabilization of cut-and-fill slopes;
- barriers preventing braiding and widening;
- seasonal or temporary wet-weather restrictions;
- drainage inspection following major storm events;
- timely repair of rills, headcuts, and failed structures;
- relocation of very short segments where engineering controls cannot provide stability.

Temporary wet-weather restrictions deserve particular consideration. Much route damage occurs when saturated soils cannot support vehicle loads. If a route is generally stable during dry conditions, a seasonal or condition-based limitation is more closely tailored than permanent closure. The Bureau should establish objective closure and reopening criteria based upon soil moisture, precipitation, rut depth, or observed damage rather than relying upon indefinite administrative discretion.



Biological soil crusts also warrant precise analysis. These crusts perform important ecological functions and may recover slowly following direct disturbance. Yet the relevant distinction is between crusts within the established route tread, where prior disturbance has already occurred, and intact crusts outside the route. Continued use confined to an existing two-track does not expand the disturbance footprint. The principal management need is preventing route widening, cross-country travel, and off-route parking. Delineators, physical barriers at vulnerable locations, education, and enforcement protect adjacent crusts more effectively than closing the route and risking creation of informal bypasses.

The Draft EA states that soil compaction may persist for up to 20 years and that closure and reclamation may reduce erosion below original levels. That generalized recovery estimate should not be used as a route-specific finding. Recovery depends upon soil type, precipitation, vegetation, reclamation technique, slope, and whether the route continues to function as a drainage feature. Some closed routes require substantial earthwork and repeated treatment; others naturally revegetate. Reclamation itself causes short-term disturbance and may increase erosion if poorly designed. The Bureau should therefore disclose the method, cost, feasibility, monitoring period, and probability of success for each route proposed for active reclamation.

The Final EA must also consider the soil consequences of concentrating traffic on a smaller network. Closure of connector routes may increase vehicle miles traveled, force repeated out-and-back travel, concentrate use upon remaining corridors, and increase localized maintenance demand. Alternative D's broader route availability may distribute traffic and reduce congestion on particular routes, a benefit the Draft EA acknowledges in its recreation discussion. This redistribution effect should be incorporated into the soil analysis rather than assuming that fewer open miles necessarily means less total soil impact.

We recommend that the Bureau retain the approximately 2.6 miles of routes crossing mapped fragile soils under a Modified Alternative D unless and only if field inspection explicitly demonstrates active, consequential erosion that cannot be corrected through engineering or seasonal management. For each segment proposed for closure, the Final EA must disclose:

- observed soil and drainage condition;
- evidence of erosion or sediment delivery;
- route use level and seasonality;
- feasible maintenance or engineering treatments;
- estimated treatment and reclamation costs;
- the expected environmental benefit of closure;
- the consequences of displaced use elsewhere in the network.



A soil-management strategy grounded in inspection, maintenance, objective thresholds, and rapid corrective action would provide stronger environmental protection than a generalized mileage-reduction approach. It would also preserve public confidence that closures are reserved for genuinely unsustainable routes rather than imposed merely because a route crosses a broad soil classification.

WATER RESOURCES

Protection of water quality, hydrologic function, riparian vegetation, wetlands, springs, seeps, and stream-channel stability is an indispensable component of responsible travel management. UPLA supports focused restrictions or engineering treatments where route use is demonstrably causing sediment delivery, bank destabilization, channel incision, contamination, or degradation of riparian habitat. The relevant inquiry, however, is whether the Draft EA establishes that continued public use of particular existing routes produces such effects and whether those effects are incapable of correction through drainage design, crossing stabilization, maintenance, temporary wet-weather restrictions, or other site-specific measures short of permanent closure.

The Trail Canyon TMA is characterized predominantly by arid and semiarid hydrologic systems in which many drainages are intermittent or ephemeral. These systems may remain dry for extended periods yet convey substantial runoff during monsoonal storms, snowmelt events, or localized high-intensity precipitation. Their ecological and geomorphic functions merit protection. At the same time, the effects of a route crossing an ephemeral drainage depend upon highly variable conditions, including channel geometry, substrate, route grade, approach alignment, crossing frequency, traffic volume, maintenance history, storm intensity, and whether the crossing functions as a sediment source, sediment trap, or merely a preexisting hardened point of passage.

The Draft EA evaluates route interactions with perennial streams, intermittent and ephemeral streams, and riparian areas primarily by counting the number of routes located in, crossing, or near these features. This spatial screening is useful, but it does not by itself establish water-quality impairment or hydrologic degradation. A route crossing a mapped drainage does not necessarily deliver sediment to surface water. Conversely, a poorly drained route located some distance upslope may convey sediment into a channel during runoff. **The Bureau must therefore distinguish geographic proximity from functional hydrologic connectivity.**

The Clean Water Act provides the principal federal framework for protecting water quality, including through state-established water-quality standards and regulation of certain discharges



to waters of the United States. However, neither the Clean Water Act nor FLPMA establishes a presumption that an existing route must be closed merely because it crosses a drainage. The governing management obligation is to prevent or correct actual degradation through measures proportionate to the identified risk. In a travel-management context, that ordinarily requires examination of whether the route is generating sediment, altering channel morphology, impeding flow, degrading riparian vegetation, or causing repeated vehicle travel within an active channel.

The Draft EA acknowledges that routes can function as conduits for sediment transport, particularly where they occur on erosive soils or intersect stream channels and riparian areas. It also recognizes that a designated route network can reduce route proliferation and unauthorized travel, thereby limiting broader landscape disturbance. The same logic applies to water resources. A clearly signed, properly maintained, and stabilized crossing often provides greater protection than closure without effective barriers, monitoring, or restoration, particularly where recreational demand remains and users may seek informal bypasses.

The Bureau should distinguish among at least four categories of route-water interaction:

1. **Stable crossings with no documented degradation.** These routes should remain open, subject to ordinary monitoring and maintenance.
2. **Crossings with correctable drainage or erosion problems.** These should receive engineering treatments such as hardened approaches, grade reversals, rolling dips, culvert repair, outsloping, rock armoring, or relocation of a short segment onto a more stable alignment.
3. **Routes presenting seasonal risk.** Where damage occurs primarily during saturated conditions or high-flow periods, temporary or seasonal restrictions should be considered before permanent closure.
4. **Routes causing documented and unmitigable degradation.** Permanent closure may be appropriate only where field evidence demonstrates continuing harm and where reasonable engineering, maintenance, or seasonal-management measures have been proven through prior implementation to not adequately resolve the problem.

Riparian areas warrant additional care because they occupy a limited portion of arid landscapes and provide disproportionately important wildlife habitat, shade, soil stability, and water-quality functions. Yet the Draft EA should not treat every route near riparian vegetation as equally harmful. The proper analysis should examine whether the route intrudes into the riparian zone, constrains channel migration, causes vegetation loss, facilitates unauthorized camping, or increases bank trampling. Where the actual concern arises from roadside camping or parking rather than through-travel, the management response should regulate the activity producing the



effect. Barriers, designated pullouts, camping setbacks, fire restrictions, signing, and enforcement may protect riparian resources while preserving route connectivity.

The Bureau should also account for the water-resource consequences of closure and reclamation. Closed routes may continue to intercept and concentrate runoff for years unless actively recontoured. Mechanical reclamation may temporarily expose soil and increase erosion. Improperly placed barriers can redirect vehicles into adjacent drainages. The Final EA should disclose the reclamation method, expected stabilization period, maintenance burden, and likelihood of success for each route proposed for closure on water-resource grounds.

UPLA recommends that the Modified Alternative D retain existing routes intersecting or approaching water resources unless the administrative record establishes site-specific, measurable, and continuing degradation that cannot be corrected through less restrictive means. The Final EA should identify, for each closure proposed on hydrologic grounds, the receiving water or riparian feature, observed condition, sediment-delivery pathway, route-use level, feasible mitigation, and expected environmental benefit of closure. Generalized assumptions regarding proximity or potential runoff are insufficient to support permanent elimination of longstanding public access.

CULTURAL RESOURCES

We recognize the exceptional cultural and archaeological significance of the Trail Canyon landscape and strongly support protection of historic properties, archaeological sites, traditional cultural places, artifacts, historic routes, structures, rock imagery, and other irreplaceable cultural resources. These resources embody the histories of Indigenous peoples, early settlement, ranching, mining, transportation, and community development throughout southern Utah. Their protection is both a legal obligation and a fundamental stewardship responsibility.

Section 106 of the National Historic Preservation Act requires federal agencies to identify historic properties, assess the effects of federal undertakings, consult with the State Historic Preservation Officer, tribal governments, and other consulting parties, and seek ways to avoid, minimize, or resolve adverse effects. 54 U.S.C. § 306108; 36 C.F.R. Part 800. **The Section 106 process is not a categorical closure mandate. It is a consultation and effects-resolution framework requiring the agency to determine whether an undertaking may alter characteristics qualifying a property for the National Register and, if so, to develop appropriate avoidance, minimization, or mitigation measures.**



The Draft EA reflects substantial inventory work. Approximately 11,710 acres, or roughly 77% of the Area of Potential Effects, have been surveyed, and 327 archaeological resources have been documented. Of those, 230 are listed, eligible, or of undetermined eligibility for the National Register, while 97 have been determined ineligible. The Draft EA reports that 178 resources are physically intersected by routes under one or more alternatives and up to 149 additional resources occur within 150 feet of open or limited routes. Under Alternative D, 126 eligible or unevaluated resources would be intersected by open or limited routes, compared with 137 under Alternative A, 95 under Alternative B, and 120 under Alternative C. Alternative D would place 90 eligible or unevaluated resources within 150 feet of open or limited routes, compared with 93 under Alternative A, 65 under Alternative B, and 89 under Alternative C. These figures demonstrate the importance of cultural-resource protection, but they do not establish that every route intersection or proximity produces an adverse effect. The Section 106 question is not simply whether a route crosses a site polygon. It is whether continued use alters the characteristics that make the property eligible for the National Register. A route may itself be part of the historic setting or historic transportation pattern. Some archaeological sites may lie beneath or adjacent to routes that have existed for decades without evidence of ongoing damage. Other sites may be vulnerable to erosion, collection, vandalism, campfire impacts, parking, or route widening. Those differences must be addressed through route-specific findings.

The Draft EA identifies several potential effects, including vehicle damage, accelerated erosion, artifact displacement, unauthorized collecting, vandalism, dispersed camping, fire rings, trash, and personal waste. These are legitimate concerns. Yet many arise from unlawful or ancillary conduct rather than the lawful act of traveling along an established route. Artifact theft, vandalism, unauthorized excavation, and damage to archaeological resources are already prohibited under the Archaeological Resources Protection Act, the Antiquities Act, FLPMA regulations, and other federal authorities. Closure of a route does not guarantee elimination of illegal conduct and may reduce opportunities for public observation, agency patrol, and volunteer site stewardship.

The Bureau should therefore avoid using unlawful conduct as a generalized justification for closing lawful access. Instead, it should identify the actual exposure pathway and tailor management accordingly. Appropriate measures may include:

- prohibiting parking or camping within defined buffers around sensitive sites;
- installing discreet barriers or delineators to prevent route widening;
- relocating a short route segment away from a vulnerable feature;
- stabilizing erosion where runoff threatens cultural deposits;
- increasing ranger patrols and volunteer site-stewardship presence;
- withholding sensitive site-location information from public maps;



- installing interpretive signs only where disclosure will not increase risk;
- applying seasonal or event-specific restrictions where concentrated visitation creates identifiable threats;
- using remote monitoring where repeated vandalism or looting has been documented.

The Bureau should also recognize that motorized access may facilitate cultural-resource education and protection. Elderly visitors, persons with disabilities, tribal elders, researchers, historians, and volunteer site stewards depend upon vehicle access to reach cultural landscapes. Public appreciation of cultural history can foster stewardship where visitation is responsibly managed. The appropriate objective is not automatic exclusion, but controlled access consistent with site sensitivity.

The completeness of the cultural inventory also requires careful treatment... approximately 23% of the Area of Potential Effects remains unsurveyed. Where the Bureau proposes to retain routes through unsurveyed high-potential areas, phased identification and monitoring may be appropriate. **Where it proposes closure, however, the lack of survey cannot be treated as evidence of adverse effect. Uncertainty must be disclosed as uncertainty rather than converted into a presumption favoring closure.**

The Travel and Transportation Programmatic Agreement provides the procedural mechanism through which route-specific effects should be identified and resolved. The Final EA should clearly explain how each route proposed for closure due to cultural-resource concerns satisfies the applicable adverse-effect standard and why treatment measures other than closure would be inadequate. Aggregate counts of intersected sites are not a substitute for this analysis.

UPLA recommends that Alternative D be modified to retain routes associated with cultural resources where continued use does not adversely affect National Register-eligible values or where effects can be avoided through site-specific treatment. Routes should not be closed merely because they intersect a broad site boundary, pass within 150 feet of a resource, or provide theoretical access that might be misused. Permanent closure should be limited to circumstances in which the Bureau documents a direct, continuing, and unmitigable threat to the integrity of a historic property.

AREAS OF CRITICAL ENVIRONMENTAL CONCERN

The Cottonwood Canyon Area of Critical Environmental Concern is a land-use planning designation established under FLPMA to protect identified relevant and important values requiring special management attention. UPLA recognizes that ACEC designation carries



substantive management consequences and supports protective measures reasonably tailored to the values for which the area was designated. At the same time, **ACECs remain public lands governed by FLPMA's multiple-use framework unless the applicable Resource Management Plan expressly provides otherwise. ACEC status does not transform an area into wilderness, prohibit motorized recreation categorically, or authorize restrictions unrelated to the designated values.**

FLPMA defines an ACEC as an area where special management attention is required to protect important historic, cultural, scenic, fish and wildlife, or natural-system values, or to protect life and safety from natural hazards. 43 U.S.C. § 1702(a). The statute requires protection of the identified values, not generalized preservation of every acre from all human use. BLM must therefore establish a rational relationship between each route designation and the specific relevant and important values of the Cottonwood Canyon ACEC.

The Draft EA identifies route mileage within the ACEC as the principal indicator of potential effect. That metric is an arbitrary and capricious mechanism to assess impact. **A route's location within an ACEC boundary does not establish that it affects the value for which the ACEC was designated. The appropriate analysis must identify the specific cultural, scenic, biological, geological, or other value at issue; the route's location and condition relative to that value; the mechanism and magnitude of effect; and the availability of mitigation.**

The Bureau should also recognize that the Cottonwood Canyon ACEC was established within a landscape already containing roads, primitive routes, livestock use, recreation, and other forms of public activity. Existing routes are part of the affected environment and, in some cases, provide access for monitoring, cultural-resource protection, wildfire response, grazing administration, invasive-species treatment, and recreational interpretation. Their continued presence does not defeat the ACEC's management objectives.

Where cultural resources constitute a principal ACEC value, the Bureau should rely upon the site-specific Section 106 analysis rather than assuming that route mileage within the ACEC inherently produces unacceptable effects. Where scenic values are implicated, the Bureau should apply the governing Visual Resource Management objectives and evaluate actual contrast.

Where wildlife or plant values are implicated, the Bureau should identify occupied habitat, sensitive periods, and documented disturbance rather than relying solely upon modeled overlap.

The ACEC analysis must also avoid creating a single-use preserve through implementation-level travel planning where the governing RMP did not adopt such a



result. FLPMA requires management in conformance with the land-use plan. An implementation decision may carry out existing ACEC prescriptions, but it may not silently enlarge them or impose new categorical prohibitions without appropriate land-use planning procedures. See 43 C.F.R. §§ 1610.5-3, 1610.5-5.

A Modified Alternative D should retain routes within the Cottonwood Canyon ACEC where:

- the route serves documented recreation, administrative, grazing, emergency, cultural-interpretive, or connectivity purposes;
- no site-specific adverse impact to a designated ACEC value has been documented;
- the route existed at the time the ACEC was designated and is compatible with the RMP's management prescriptions;
- any localized concern can be corrected through signing, drainage work, route hardening, seasonal management, or enforcement;
- closure would materially reduce access without a commensurate resource benefit.

Where the Bureau identifies a genuine conflict, the first response should be focused special management, precisely because special management attention is the defining statutory function of an ACEC. Route closure may be one management tool, but it is not synonymous with special management and should not be presumed to be the preferred tool.

UPLA therefore requests that the Final EA identify the specific relevant and important value affected by each proposed closure within the Cottonwood Canyon ACEC and explain why continued use, subject to mitigation, would be inconsistent with the governing RMP. Mere location within the ACEC boundary is legally and analytically insufficient.

WILDERNESS STUDY AREAS

The Trail Canyon TMA contains portions of the Canaan Mountain, Moquith Mountain, North Fork Virgin River, Orderville Canyon, and Parunuweap Canyon Wilderness Study Areas. UPLA recognizes BLM's obligation under FLPMA § 603(c) to manage Wilderness Study Areas so as not to impair their suitability for potential congressional designation, subject to continuation of existing uses in the manner and degree provided by law. 43 U.S.C. § 1782(c). That nonimpairment obligation is significant, but it does not convert every existing route within or adjacent to a WSA into an unlawful use, nor does it authorize the Bureau to manage surrounding multiple-use lands as wilderness.

BLM Manual 6330 distinguishes roads from primitive routes and recognizes that primitive routes may exist within Wilderness Study Areas without defeating wilderness characteristics. The relevant questions include whether



- A feature is a road as defined by the wilderness inventory process,
- use is part of an existing use,
- Continued activity creates new surface disturbance,
- It impairs suitability for preservation as wilderness.

The Draft EA evaluates primitive-route mileage within the WSAs and compares the extent of open, limited, and closed designation among alternatives. This approach provides useful information, but mileage alone does not establish impairment. A longstanding primitive route confined to an existing disturbance footprint may have substantially different consequences from route widening, mechanical improvement, new construction, or increasing use beyond historical levels. The Draft EA should therefore evaluate the actual character, condition, maintenance history, visibility, and use intensity of each primitive route.

The Bureau must also carefully distinguish between management of the WSA itself and management of lands outside its boundary. Visual or auditory effects perceived from within a WSA do not automatically authorize closure of routes on adjoining multiple-use lands. Wilderness Study Area management does not include an implied buffer zone. **Congress has repeatedly reserved to itself the authority to designate wilderness and establish its boundaries. Agency travel planning should not expand wilderness-style restrictions beyond those boundaries merely to enlarge perceived solitude or naturalness.**

This concern is especially important where closure rationales invoke route proximity, visibility, noise, or perceived intrusion without demonstrating actual impairment within the WSA. Motorized use on a preexisting route outside a WSA may be visible or audible from isolated locations, but that does not make the route incompatible with FLPMA unless the governing land-use plan imposes a specific restriction or the effect rises to a level that legally impairs WSA suitability. The Bureau must explain that connection rather than presuming it.

Within WSAs, the continuation of existing uses warrants careful analysis. FLPMA § 603(c) expressly provides that mining, grazing, and other uses may continue in the manner and degree in which they were conducted when the statute was enacted, subject to the nonimpairment standard. Public route use that predates WSA designation and remains confined to an existing footprint may therefore present a materially different legal question from new route construction or substantial expansion.

UPLA recommends that the Bureau apply the following principles:

- retain existing routes outside WSA boundaries unless an independent, non-buffer rationale supports closure;



- retain primitive routes within WSAs where continued use does not create new surface disturbance or impair suitability for preservation;
- distinguish lawful existing use from unauthorized route proliferation;
- use signing, barriers, education, and monitoring to prevent route widening and cross-country travel;
- employ temporary restrictions where a specific, recoverable impairment is occurring;
- disclose the route-specific evidence supporting any finding of impairment.

The Draft EA reportedly concludes that Alternative D has a higher potential for OHV-related effects to WSA values than the more restrictive alternatives. That comparative statement is not enough. NEPA requires the Bureau to identify the nature, intensity, and significance of those effects. A larger number of retained route miles does not necessarily equate to impairment, particularly where the routes are established, low-use, and consistent with historical conditions.

Alternative D should therefore be modified to retain routes whose closure is based upon generalized WSA proximity, route-density reduction, or preservation of solitude beyond the legal boundary. Closure must be reserved for routes where the Bureau demonstrates, through site-specific evidence, that continued use would violate the nonimpairment standard and that no less restrictive management measure would suffice.

LANDS WITH WILDERNESS CHARACTERISTICS

The Draft EA identifies four Lands with Wilderness Characteristics units within the TMA: Canaan Mountain, Moquith Mountain, Orderville, and Parunuweap. Together, these units contain approximately 48.3 miles of evaluated routes. The Bureau also identifies three “BLM Natural Areas” within Moquith Mountain, Orderville Canyon, and Parunuweap Canyon, where the 2008 RMP adopted discretionary management to protect, preserve, and maintain primitive recreation, apparent naturalness, and solitude.

UPLA recognizes and calls the Bureau’s attention to the distinction between inventory and management. An LWC inventory is informational. It records BLM’s determination that an area may possess sufficient size, naturalness, and opportunities for solitude or primitive recreation to meet wilderness-characteristics criteria. Inventory alone does not establish a protective designation, prohibit motorized use, or displace FLPMA’s multiple-use mandate. Management restrictions arise only where the governing RMP affirmatively adopts prescriptions for the area.



The Draft EA correctly acknowledges that BLM Natural Areas are discretionary management categories and differ fundamentally from congressionally designated wilderness and statutory WSAs. This distinction must carry through the effects analysis and final decision. The Bureau should not apply a wilderness nonimpairment standard to LWC units generally or treat all inventoried wilderness characteristics as requiring maximum route closure.

For areas outside the BLM Natural Areas, the existence of wilderness characteristics is one land-use value among many. FLPMA does not establish a statutory hierarchy elevating discretionary wilderness-character protection above recreation, access, grazing, minerals, wildlife, or other principal uses. The Bureau may consider wilderness characteristics, but travel designations must remain consistent with the 2008 RMP and supported by balanced multiple-use analysis.

For BLM Natural Areas, the relevant RMP direction is more protective, but still does not establish an automatic prohibition on existing route use. The 2008 RMP limits OHV use to designated routes and directs the Bureau to designate open or limited routes only where use would not adversely affect the natural, aesthetic, scenic, or other values for which the areas are managed. The key phrase is “adversely affect.” The Bureau must identify an actual adverse effect rather than equating route presence with incompatibility.

The affected-environment analysis reports approximately 6.3 miles of evaluated primitive routes within the three BLM Natural Areas. A primitive route, by definition, is a transportation feature that has not been constructed or improved by mechanical means and has not been maintained for relatively regular and continuous use. Such routes may be faint, narrow, visually subordinate, and compatible with primitive recreation when use remains low and confined. Their designation as open does not necessarily diminish the apparent naturalness of the surrounding landscape to a degree inconsistent with RMP objectives.

The Bureau should also recognize that motorized access and primitive recreation are not mutually exclusive. Primitive motorized travel on low-standard routes is itself a recognized form of dispersed recreation. Many visitors seek remote, undeveloped landscapes precisely through high-clearance or four-wheel-drive travel that requires skill, self-reliance, and minimal infrastructure. The fact that such travel is motorized does not erase its primitive character for users who depend upon the vehicle as the means of access.

The analysis of solitude similarly requires nuance. Solitude is experiential and variable. A low-use primitive route may generate only intermittent encounters and may distribute visitors across a wider landscape, reducing crowding elsewhere. Closing routes can concentrate both motorized



and non-motorized visitors at fewer trailheads and corridors, potentially reducing solitude rather than increasing it.

Naturalness should be evaluated in light of the existing landscape. Longstanding routes are part of the baseline. Closing a route may allow gradual revegetation, but until successful reclamation occurs, the physical linear feature may remain visible for decades. A route-designation change alone does not immediately restore apparent naturalness. The Final EA should not claim visual or wilderness-character benefits without evaluating reclamation feasibility and time to recovery.

UPLA recommends that the Modified Alternative D:

- retain all routes in LWC units where no RMP prescription requires closure;
- retain all routes in BLM Natural Areas where low-level use is compatible with naturalness, solitude, scenic quality, and primitive recreation;
- distinguish existing primitive routes from constructed and maintained roads;
- eliminate application of WSA or wilderness standards to discretionary LWC management;
- evaluate crowding and visitor-distribution effects before assuming closure improves solitude;
- require route-specific findings of adverse effect before closing a route under Natural Area prescriptions;
- preserve access needed for recreation, emergency response, grazing, monitoring, and stewardship where consistent with the RMP.

The Bureau's authority to protect wilderness characteristics is real, but it must be exercised within the limits of the governing land-use plan and FLPMA's multiple-use mandate. Implementation-level travel planning should not become a vehicle for imposing wilderness management where Congress and the RMP have not done so.

WILD AND SCENIC RIVER CORRIDORS

The Draft EA identifies five suitable river segments within the Trail Canyon TMA for potential inclusion in the National Wild and Scenic Rivers System. These include the East Fork Virgin River, Esplin Gulch and Orderville Canyon, Meadow Creek and Mineral Gulch, and the North Fork Virgin River. Recreation and scenery are identified as key outstandingly remarkable values. All but one segment are classified as suitable "wild"; the East Fork Virgin River segment 37-40a is classified as suitable "scenic" because primitive vehicle routes already exist within its corridor. Approximately two miles of evaluated routes occur within the quarter-mile corridors used for analysis.



UPLA supports protection of the free-flowing condition, water quality, and outstandingly remarkable values of eligible or suitable river segments consistent with the Wild and Scenic Rivers Act and applicable BLM policy. However, **suitability is not equivalent to congressional designation. Until Congress acts, interim management must preserve the values supporting eligibility or suitability without imposing restrictions exceeding the governing RMP or unnecessarily eliminating established multiple uses.**

The Draft EA concludes that Alternatives A, C, and D would retain all evaluated route mileage in the suitable-river corridors, while Alternative B would retain approximately 0.3 miles and close approximately 1.7 miles. The Bureau characterizes Alternative B as presenting lower potential for OHV-related effects because fewer routes would remain open. This comparison does not establish that closure is needed to protect any outstandingly remarkable value.

For the East Fork Virgin River scenic segment, the existence of primitive vehicle routes is part of the basis for its “scenic,” rather than “wild,” classification. Closing those routes in an implementation-level TMP should not be used to administratively alter the classification premise or manage the segment as if it possessed a more restrictive category. The Bureau is legally bound to preserve the classification and values identified in the RMP unless changed through lawful land-use planning.

The principal potential effects identified by the Draft EA are sediment delivery, visual disturbance, unauthorized route proliferation, litter, parking, staging, and conflicts between motorized and non-motorized users. These concerns should be addressed according to their actual source. Where sediment is the concern, the Bureau should stabilize crossings and approaches. Where visual disturbance is the concern, it should evaluate actual contrast and route visibility from key observation points. Where parking or staging causes damage, it should prohibit or channel those activities. Where litter is the concern, it should use education and enforcement. Where route proliferation occurs, barriers and clear signing are appropriate. Where user conflict occurs, scheduling, speed controls, directional use, etiquette programs, or localized restrictions may be effective.

The Draft EA also acknowledges that routes provide beneficial recreational access to river corridors. That benefit should receive equal weight. Motorized access allows older visitors, families, persons with disabilities, anglers, photographers, and others to experience river landscapes that would otherwise be inaccessible. Recreation is itself an outstandingly remarkable value for these segments. The Bureau should not subordinate recreation as an equitable



remarkable value by eliminating a substantial category of recreational access absent evidence of actual incompatibility with congressionally established management directives.

The quarter-mile corridor used for analysis is a planning convention, not proof that every route within that distance affects river values. Topography, vegetation, canyon walls, route elevation, hydrologic separation, and visibility may eliminate or greatly reduce any effect. Route-specific analysis is therefore essential.

UPLA recommends retaining all of the approximately two miles of existing evaluated routes within suitable river corridors under Modified Alternative D, with action towards closure occurring only if the Bureau identifies a direct and unmitigable effect upon free-flowing condition, water quality, or an outstandingly remarkable value. The Final EA should explain, for every proposed closure:

- the river segment and classification;
- the specific outstandingly remarkable value at issue;
- the route's visibility, hydrologic connection, and use level;
- the documented effect, not merely the potential effect;
- available mitigation;
- the loss of recreational access resulting from closure.

A suitable-river corridor should not function as an automatic closure buffer. Management must preserve river values while remaining faithful to the existing classification, the governing RMP, and FLPMA's multiple-use mandate.

VISUAL RESOURCE MANAGEMENT

The visual landscapes of the Trail Canyon TMA are among its most important public values. Expansive vistas, canyon systems, cliffs, desert vegetation, dark skies, and contrasting geological formations support sightseeing, photography, camping, hunting, hiking, motorized exploration, and community identity. UPLA supports management that protects scenic quality and avoids unnecessary visual degradation.

The Draft EA distinguishes between Visual Resource Inventory classes and Visual Resource Management classes. This distinction is legally and analytically important. VRI classes are informational and do not establish management direction or independently constrain surface-disturbing activities. VRM classes, by contrast, are assigned through the Resource Management Plan and establish management objectives. The Draft EA expressly quotes BLM guidance stating that inventory classes are not used as a basis for limiting surface disturbance. Accordingly, route



closure cannot be justified merely because a route occurs within VRI Class I or II. The Bureau must identify the applicable VRM objective and determine whether continued use of the existing route is inconsistent with that objective. Existing routes form part of the landscape baseline against which contrast is assessed. A narrow, weathered, low-use primitive road may be visually subordinate and consistent with Class II retention objectives, particularly where it follows natural contours, is screened by vegetation or topography, or has existed for decades.

The objectives generally associated with the VRM classes are graduated rather than categorical. Class I seeks preservation of the existing character, Class II retention, Class III partial retention, and Class IV allows major modification. Even within Classes I and II, the agency must evaluate actual contrast in form, line, color, and texture. The presence of a linear feature on a GIS map does not establish that it is visible from key observation points or materially degrades scenic quality.

The Draft EA appears to compare route mileage within VRI and VRM classes as an indicator of potential visual effect. This metric is incomplete. Visual impact depends upon:

- distance from viewers;
- duration and frequency of visibility;
- topographic screening;
- vegetation;
- route width and surface color;
- slope position;
- contrast with existing landscape lines;
- traffic volume;
- dust generation;
- presence of structures, signs, staging, or parking;
- sensitivity of the observation point.

A primitive two-track visible only at close range presents a fundamentally different visual effect from a wide graded road traversing an exposed slope. The Final EA should not treat those routes equivalently.

The analysis should also distinguish the visual footprint of the route from the transient visibility of vehicles. The route may be part of the existing landscape and remain visible after closure. Vehicle movement is temporary, intermittent, and often distant. Where dust creates the principal visual concern, speed limits, surface treatment, and seasonal management provide targeted solutions. Where parking or staging creates concentrated visual clutter, those activities can be relocated or restricted without closing the through-route.



Closure and reclamation do not produce immediate visual restoration. Linear disturbances in arid environments may remain visible for many years. Mechanical ripping, recontouring, barriers, and revegetation may initially increase contrast. The Draft EA should disclose the expected recovery timeline and probability of successful visual rehabilitation before claiming that closure will restore natural appearance.

Scenic quality also has an access component. Visual resources provide public value only when the public can experience them. Motorized routes function as scenic byways at a primitive scale, providing access to overlooks, geological formations, canyon views, sunsets, wildlife observation, and photography locations. Closing routes may protect a view from hypothetical disturbance while simultaneously preventing large segments of the public from seeing it. That tradeoff must be acknowledged.

The Bureau should also avoid using visual-resource management as a surrogate for wilderness buffers. A route should not be closed merely because it may be visible from a WSA, Natural Area, National Park, or other sensitive landscape. **The applicable question is whether the route violates the VRM objective assigned to the land on which it is located, not whether a viewer in an adjacent area would prefer no evidence of motorized use.**

UPLA recommends that the Modified Alternative D retain existing routes in higher-value visual areas where the route is part of the baseline landscape, produces weak or subordinate contrast, or can be managed through less restrictive measures. The Final EA should require a route-specific contrast analysis before relying upon visual resources as a closure rationale. Appropriate mitigation may include:

- limiting route widening;
- using native-colored aggregate;
- restoring unauthorized pullouts;
- reducing dust through speed control or surface treatment;
- relocating signs or barriers to visually subordinate locations;
- restricting staging and long-term parking;
- revegetating disturbed shoulders;
- rerouting short exposed segments where necessary.

Visual-resource protection is compatible with continued public access where management is tailored to actual contrast. The Bureau should reject the simplistic assumption that fewer open routes necessarily produce a superior scenic outcome and instead apply its established VRM methodology to the conditions presented by each route.



ALTERNATIVES ANALYSIS

NEPA requires federal agencies to evaluate reasonable alternatives in sufficient comparative detail to permit the decisionmaker and the public to understand the material tradeoffs among competing courses of action. The alternatives analysis is the heart of the environmental review process because it determines whether the agency has genuinely considered different means of satisfying the purpose and need or has merely documented a predetermined outcome. See 42 U.S.C. § 4332(2)(C)(iii); 40 C.F.R. §§ 1501.5(c)(2), 1502.14; *Citizens Against Burlington, Inc. v. Busey*, 938 F.2d 190, 195-96 (D.C. Cir. 1991).

The Trail Canyon Draft EA evaluates 469 miles of routes divided among 594 route segments on 182,766 acres of BLM-administered land. The inventory consists principally of 449 miles designated through the 2008 Travel Management Plan, together with 19 miles of additional linear features subsequently determined to possess an identifiable purpose and need. The adjudicated Hancock Road and Sand Dunes Road/Yellowjacket Road rights-of-way are not included within the 469-mile evaluated network because they are not administered as BLM routes.

The four alternatives span a broad numerical range:

Alternative	OHV-Open	OHV-Limited	OHV-Closed	General Emphasis
Alternative A	449 miles	0 miles	19 miles	Current management
Alternative B	326 miles 71%	2 miles less than 1%	141 miles 29%	Maximum resource-conservation emphasis
Alternative C	423 miles 91%	5 miles 1%	41 miles 8%	Intermediate access and conservation
Alternative D	446 miles 95%	0 miles	23 miles 5%	Access emphasis with resource protections

Alternatives B through D were developed by weighing each route's identified purpose and need against resource concerns, network connectivity, public uses, route condition, known conflicts, recreational attractions, authorized uses, and opportunities for mitigation. BLM states that it considered how individual designations would affect travel patterns within route-network areas, including access for hunting, firewood gathering, camping, vehicle exploration, and other uses.



The route reports also identify routes considered particularly important for network connectivity and assign implementation measures to address particular resource concerns.

We support this network-level and route-level methodology in principle. Travel management cannot be reduced to a mathematical exercise in which the alternative closing the most mileage is presumed environmentally superior. A functional transportation network is greater than the sum of its individual segments. Its public value depends upon continuity, loops, alternate exits, destination access, route diversity, visitor dispersion, connection to adjacent jurisdictions, and the ability to reach public lands without repeated dead ends or duplicative out-and-back travel.

The Draft EA itself confirms that the alternatives produce materially different recreational outcomes. Alternative D would retain motorized access on 265 routes serving recreation destinations, exceeding the 256 routes retained under Alternative A and substantially exceeding the 249 under Alternative C and 181 under Alternative B. Alternative D would maintain every evaluated route within the Moquith Mountain and Orderville Canyon Special Recreation Management Areas for motorized use, provide a similar level of OHV-facilitated access to Alternative A, and offer substantially greater access than Alternatives B and C. The Bureau further acknowledges that the larger network under Alternative D will reduce congestion by distributing travel among more routes.

These differences are not incidental. They concern whether the selected network will continue to provide meaningful opportunities for vehicle exploration, dispersed camping, hunting, photography, sightseeing, cultural-resource appreciation, hiking access, equestrian staging, wildlife observation, family recreation, and access for elderly and mobility-impaired visitors. They also concern whether travel will remain distributed across a resilient network or become concentrated upon fewer corridors.

In our review of the Draft EA, we have therefore evaluated each alternative according to five governing principles:

1. First, the alternative must satisfy FLPMA's multiple-use and sustained-yield mandate rather than maximize one resource objective to the exclusion of recreation and access.
2. Second, closure must be supported by route-specific evidence demonstrating actual or reasonably probable harm, not merely route proximity to a mapped resource or an abstract preference for lower route density.
3. Third, the selected network must preserve functional connectivity, including loops, alternate travel paths, access to recreation destinations, and reasonable connections to State Trust Lands, private lands, county roads, National Forest routes, and other adjoining transportation systems.



4. Fourth, less restrictive management measures must be considered before permanent closure. These include maintenance, signing, route hardening, drainage correction, barriers against widening, seasonal limitations, speed restrictions, camping setbacks, cultural monitoring, species surveys, education, enforcement, and adaptive management.
5. Fifth, the selected alternative must account for the social, economic, public-safety, and accessibility consequences of closure rather than treating route-mile reduction as an environmental benefit without a corresponding public cost.

Measured against these principles, Alternative B is substantially and arbitrarily over restrictive, Alternative C constitutes an improvement but remains unnecessarily and unjustifiably closure-oriented, and Alternative D provides the most legally defensible and operationally functional foundation. Alternative D nevertheless requires modification because some of its proposed closures are blatantly tied to generalized wilderness-character, resource-proximity, or route-density concerns rather than documented and unmitigable harm. We therefore support and urge the BLM to implement a **Modified Alternative D** incorporating additional open designations from Alternative A and, where appropriate, carefully tailored limited designations rather than permanent closure.

Alternative A

Alternative A represents continuation of the 2008 TMP, as subsequently amended. It retains 449 miles of evaluated routes as OHV-Open and treats 19 miles of linear features not designated in 2008 as OHV-Closed. Although 473 miles are described elsewhere as open under present management when the adjudicated Hancock Road and Sand Dunes Road/Yellowjacket Road rights-of-way are included, those county rights-of-way are excluded from the 469-mile BLM route inventory analyzed in this EA

Alternative A provides the closest approximation to the route network upon which the public has relied since 2008. It preserves established patterns of use, maintains familiar connections among geographic areas, and avoids the dislocation that would result from closing substantial portions of the network. It also preserves routes that have functioned for many years under an existing designated-route system rather than under unrestricted cross-country travel.

The existing management baseline is important. In 2008, BLM converted approximately 98% of the Kanab Field Office from lands open to cross-country OHV travel to lands limited to designated routes. That action substantially altered the management regime by concentrating travel upon an identified network and prohibiting motorized travel elsewhere. The current planning process is therefore not correcting an unrestricted or unmanaged landscape. It is



reconsidering a network that has operated under legally established and highly effective route-based controls for nearly two decades.

Alternative A's primary strength is preservation of public reliance and network integrity. Under this alternative, 256 routes providing primary access to recreation destinations would remain open. All evaluated routes within the Moquith Mountain and Orderville Canyon SRMAs would remain available for motorized travel. Existing primitive-route access within Wilderness Study Areas would remain unchanged, and effects associated with route use would remain generally consistent with present conditions.

Alternative A also provides an important evidentiary benchmark. **If routes have remained open since 2008 without documented site-specific degradation requiring emergency closure, that history bears directly upon whether permanent closure is now necessary.** BLM should compare current conditions with prior inventories, monitoring records, maintenance history, incident reports, species data, cultural-resource condition assessments, erosion observations, and enforcement records. **Where the record demonstrates continued use without measurable deterioration, the burden of justifying closure should be correspondingly substantial.**

UPLA nevertheless recognizes that Alternative A is not necessarily the optimal final decision in its entirety. Some route conditions may have changed since 2008. New surveys may identify occupied special-status plant habitat, vulnerable cultural properties, unstable crossings, or other site-specific concerns warranting treatment. The 19 miles of subsequently inventoried linear features must also receive affirmative designations based upon current purpose and need rather than automatically inheriting the status of the 2008 network. Alternative A's principal weakness is not that it retains too much access. Rather, it does not incorporate the full benefit of the route-specific information, implementation commitments, and targeted mitigation measures developed during the present planning process. A final decision should preserve Alternative A's network continuity while incorporating scientifically justified management prescriptions developed under Alternatives C and D.

The Bureau should therefore use Alternative A as an access baseline and evidentiary control, not dismiss it merely because it represents no action. NEPA does not prohibit selection of a no-action alternative where it best satisfies statutory obligations. Nor does **the existence of the 2017 Settlement Agreement compel BLM to close previously designated routes.** The agreement requires reevaluation and documentation; it does not establish that reevaluation must produce a predetermined reduction in mileage.

UPLA recommends that BLM retain Alternative A designations where:



- the route continues to serve an identifiable public, recreational, administrative, grazing, emergency, or connectivity purpose;
- no current route-specific evidence demonstrates material resource harm;
- concerns can be resolved through implementation measures;
- closure would sever a loop, eliminate an alternate exit, or create a dead end;
- the route provides access to recreation destinations, dispersed camping, State Trust Lands, private lands, range facilities, or adjoining transportation systems;
- the principal rationale for closure is generalized wilderness-character protection outside statutory wilderness or an assumption that reducing route density is inherently beneficial.

Alternative A is therefore not our preferred final alternative in unmodified form, but it supplies essential open-route designations that should be incorporated into Modified Alternative D.

Alternative B

Alternative B is the most restrictive action alternative. It would designate 326 miles, or 71% of the evaluated network, as OHV-Open; two miles as OHV-Limited to e-bikes; and 141 miles, or 29% , as OHV-Closed. Compared with existing management, it would close 124 miles that are presently available for public motorized use.

Alternative B emphasizes maximum avoidance of mapped sensitive resources. It prioritizes closure in Wilderness Study Areas, BLM Natural Areas, Lands with Wilderness Characteristics, threatened and endangered species habitat, riparian areas, and other resource-sensitive settings. Although conservation is a lawful and necessary component of travel management, Alternative B treats route removal as the dominant response without adequately demonstrating that the closed routes are individually unsustainable or that targeted management cannot resolve the identified concerns.

The recreational consequences would be substantial. Alternative B would retain motorized access on only 181 routes providing primary access to recreation destinations, compared with 256 under Alternative A, 249 under Alternative C, and 265 under Alternative D. Within the Moquith Mountain SRMA, it would retain 15 miles for motorized use, which is a mere half of the mileage available under Alternatives A, C, and D. In the Orderville Canyon SRMA, Alternative B would eliminate motorized designation from all evaluated routes.

Alternative B would also eliminate all motorized designations from primitive routes within the Trail Canyon WSAs. The Draft EA identifies 24.5 miles of such primitive routes under current management. Closing the entirety of that system assumes that every primitive route is



incompatible with WSA management without distinguishing route character, preexisting use, surface disturbance, visibility, maintenance, or actual impairment.

Within BLM-inventoried LWC units, Alternative B would close 39.2 of 48.3 miles, eliminating 81% of the evaluated route mileage. It would close every evaluated route in BLM Natural Areas, including all motorized route access within the Orderville LWC unit and a substantial reduction in Parunuweap Canyon.

This result raises several legal and policy concerns.

First, LWC inventory is not a statutory land designation. Outside areas governed by an affirmative RMP prescription, wilderness characteristics are one resource value among many and cannot lawfully function as an automatic route-closure criterion. Alternative B risks managing inventoried lands as de facto wilderness even though Congress has not designated them and the governing RMP has not necessarily selected preservation as the controlling use.

Second, the complete elimination of primitive-route access in WSAs improperly collapses the distinction between existing low-standard routes and new surface-disturbing development. The applicable nonimpairment standard requires analysis of whether continued use impairs suitability for wilderness preservation. It does not dictate categorical closure of every primitive route.

Third, Alternative B relies too heavily upon aggregate spatial overlap. Route mileage within wildlife habitat, modeled plant habitat, cultural-resource buffers, riparian proximity, or visual-resource classifications is repeatedly treated as a proxy for environmental harm. That approach does not establish whether the routes cause measurable effects or whether the concern is susceptible to mitigation.

Fourth, Alternative B would reduce visitor dispersion and concentrate remaining use upon fewer corridors. This will increase congestion, user conflict, soil wear, dust, roadside camping pressure, and demand for maintenance on retained routes. **The Draft EA recognizes that a larger network under Alternative D could reduce congestion; the inverse consequence of Alternative B should be equally acknowledged.**

Fifth, the EA assumes that all alternatives will produce identical visitation and economic effects. That assumption is particularly implausible for Alternative B because closure of nearly one-third of the evaluated network would materially alter the quantity, quality, diversity, and accessibility of recreation opportunities.



Alternative B also makes inadequate use of the OHV-Limited designation. Only two miles would be limited, and those limitations apply to e-bikes. Where BLM has identified seasonal wildlife concerns, vehicle-width concerns, wet-weather vulnerability, or localized user conflict, a carefully tailored limitation would serve to preserve access while resolving the actual issue. **The near-binary structure of Alternative B, either fully open or permanently closed, reflects insufficient consideration of intermediate management.**

UPLA ardently opposes Alternative B. It would unnecessarily eliminate longstanding access, impair network functionality, reduce opportunities for elderly and disabled users, diminish recreation-based economic activity, and impose wilderness-style management across lands not designated as wilderness. It does not represent a balanced application of FLPMA, and its closure level is not proportionate to the route-specific evidence described in the Draft EA.

Alternative C

Alternative C would designate 423 miles, or 91% of the evaluated network, as OHV-Open; five miles, or 1%, as OHV-Limited to e-bikes; and 41 miles, or 8%, as OHV-Closed. It is presented as an intermediate alternative designed to reconcile motorized access with conservation of sensitive natural and cultural resources while reducing user conflict.

Alternative C is materially preferable to Alternative B. It retains 97 more open-route miles, closes 100 fewer miles, preserves substantially more access to recreation destinations, and maintains most evaluated route mileage within the Moquith Mountain and Orderville Canyon SRMAs. It would retain motorized designation on 249 routes providing primary access to recreation destinations, only seven fewer than Alternative A but 16 fewer than Alternative D.

Alternative C also demonstrates that meaningful resource protection can occur without the sweeping closures proposed under Alternative B. It would retain 24 miles of primitive routes within WSAs, only about one mile less than Alternative A. This includes a reduction of 0.2 mile in the Orderville Canyon WSA and 0.1 mile in the Parunuweap Canyon WSA, while eliminating open designations in the Canaan Mountain WSA.

Within LWC units, however, Alternative C would reduce available motorized mileage by 19.2 miles, retaining 27.7 miles as open and 1.4 miles as limited. It would retain only 1.7 miles within BLM Natural Areas, representing a reduction of 4.6 miles, or 73%, from current use.

These severe reductions warrant much closer scrutiny. The Draft EA states that BLM believes the character and use of the routes retained under Alternative C have not significantly changed



since inventory and that continued use would not interfere with protection and preservation of wilderness characteristics. That reasoning logically suggests the need for an equivalent route-specific explanation for routes proposed for closure. If continued use of some longstanding primitive routes is compatible with naturalness and solitude, BLM must explain why similarly situated routes are not.

Alternative C also reduces access for several popular activities. The Draft EA reports reductions ranging from 8% for hiking and photography access to 18% for hunting access. It concludes that Alternative C provides less OHV-facilitated access than Alternatives A and D. The effect upon hunting is especially significant. Motorized routes frequently provide the means of reaching hunting areas, transporting equipment, retrieving lawfully harvested game, and allowing older or mobility-impaired hunters to participate. An 18% reduction in route access to hunting opportunities cannot be dismissed merely because nonmotorized travel remains legally permissible across the landscape.

Alternative C's reliance upon e-bike-only limitations also requires explanation. An e-bike designation is not a functional substitute for full motorized access for families, disabled visitors, dispersed campers, hunters carrying equipment, or users traveling in high-clearance vehicles. The Bureau must identify why e-bike access is responsive to the route's established purpose and need and whether the limitation effectively excludes the populations and activities historically dependent upon that route.

Alternative C nevertheless contains potentially useful route-specific conservation measures that should be considered for incorporation into Modified Alternative D. Where a route presents a documented but temporally limited concern, a seasonal restriction may be appropriate. Where route width is the issue, a width limitation may be justified. Where cultural-resource monitoring or drainage correction is required, those prescriptions can accompany an open designation. **The Final EA should not, however, treat Alternative C's additional closures as inherently more balanced merely because they fall numerically between Alternatives B and D.**

UPLA does not support Alternative C as the final decision because it closes 18 more miles than Alternative D and reduces important recreation and access values without a demonstrated commensurate environmental benefit. Alternative C is useful principally as a source of targeted management prescriptions and carefully justified limitations that may be incorporated into a Modified Alternative D.



Alternative D

Alternative D would designate 446 miles, or 95% of the evaluated network, as OHV-Open and 23 miles, or 5% , as OHV-Closed. It proposes no OHV-Limited mileage. BLM describes Alternative D as prioritizing OHV access and accommodating a broad range of opportunities and uses while addressing adverse resource effects. It would retain more evaluated route mileage as open than any other action alternative.

We support Alternative D as the strongest foundation for the final decision. It most closely satisfies FLPMA's multiple-use mandate, preserves a functional and interconnected transportation system, maintains recreation access, supports visitor dispersion, and reduces unnecessary reliance upon closure as the principal management tool. Alternative D would retain motorized access on 265 routes serving recreation destinations; which is 9 more than Alternative A, 16 more than Alternative C, and 84 more than Alternative B. The increase over Alternative A reflects incorporation of some previously undesignated linear features that BLM's inventory determined possess an identifiable purpose and need. This result is particularly important because the 2017 Settlement Agreement reportedly provides that a route lacking an identified purpose and need will not be proposed as part of the designated network. The converse implication is that routes possessing an affirmed purpose and need merit designation unless a demonstrated resource conflict outweighs that purpose and cannot be resolved through mitigation. Alternative D best reflects that balance.

Alternative D would retain all evaluated route mileage within the Moquith Mountain and Orderville Canyon SRMAs, consistent with Alternative A. It would provide access for a broad spectrum of motorized and nonmotorized activities, ranging from vehicle exploration and sightseeing to hiking, hunting, photography, camping, and access to other recreation destinations. The Bureau acknowledges that Alternative D would provide a level of OHV-facilitated access similar to Alternative A and greater than the other action alternatives.

Alternative D would also retain 44.3 miles within LWC units, only four miles less than Alternative A. Within BLM Natural Areas, it would retain 3.8 miles, a reduction of 2.5 miles from current management. The Natural Area reductions include one mile each in the Moquith Mountain and Orderville Canyon units and 0.3 miles in the Parunuweap Canyon Natural Area.

Within WSAs, Alternative D would retain essentially the existing primitive-route network. This is legally appropriate. The Draft EA's comparative description that Alternative D produces greater potential effects than more restrictive alternatives does not establish actual impairment. A



route-mile comparison cannot substitute for analysis of route character, use intensity, maintenance, surface disturbance, or demonstrated effects upon naturalness and solitude.

Alternative D also compares favorably in relation to special-status species. The Draft EA notes that the Biological Assessment submitted for Endangered Species Act consultation analyzed an earlier version of Alternative D containing more open mileage than any of the alternatives presently under consideration. BLM subsequently reduced mileage below that consultation baseline. This is highly relevant because it indicates that the present Alternative D lies within a previously evaluated upper-bound action scenario.

The principal criticism directed at Alternative D in the EA is that a larger network may produce more potential wildlife, water, visual, cultural, and wilderness-character effects and may increase the possibility of user conflict. Those comparisons must be placed in context.

The Bureau's own regulations do not require elimination of all environmental effects arising from a designated route network. The Draft EA expressly acknowledges this point and identifies education, signing, maintenance, enforcement, monitoring, and reclamation as measures applicable to all alternatives. The relevant question is whether Alternative D's effects are acceptable and manageable, not whether Alternative B would eliminate more theoretical exposure by eliminating more access.

Similarly, the user-conflict analysis asserts that more routes necessarily creates more conflict; when in fact, a larger network would reduce encounters by dispersing users. Alternative D may therefore reduce congestion and localized conflict even while retaining more total routes. The Bureau must rely upon documented complaints, collision data, recreation surveys, incident records, and route-specific observations rather than assuming conflict from route mileage.

Alternative D's primary deficiency is that it still closes 23 miles, including four miles reportedly open under current management. Some closures may be justified by acute, site-specific, and unmitigable conflicts. Others appear to be based upon route proximity to wilderness characteristics, generalized visual or habitat concerns, perceived redundancy, or resource effects that can be managed through targeted measures.

We therefore support Alternative D only with modification. The final decision should retain Alternative D's broad access framework while incorporating additional open routes from Alternative A and management prescriptions from Alternative C where needed.



Recommended Modified Alternative D

UPLA recommends that the Bureau adopt a Modified Alternative D as the selected travel network. Modified Alternative D should retain the 446 miles designated OHV-Open under Alternative D, reopen or retain additional routes proposed for closure where no route-specific finding demonstrates unavoidable harm, and apply narrowly tailored limitations or implementation prescriptions where a documented concern can be resolved without permanent closure.

This recommendation is expressly within the scope of the Draft EA. The Bureau states that the Authorized Officer may select a modification of an alternative or combine elements from multiple alternatives. Because every route designation considered for Modified Alternative D has already been analyzed under at least one of the four alternatives, the Bureau can adopt such a configuration without departing from the range of alternatives evaluated.

Modified Alternative D should be organized around a rebuttable presumption of continued access for existing routes possessing an identified purpose and need. That presumption should be overcome only where BLM documents:

1. a specific resource or safety concern attributable to use of the route;
2. measurable or reasonably probable harm of sufficient magnitude to warrant restriction;
3. a rational causal connection between route use and the identified effect;
4. the inadequacy of maintenance, engineering, signing, enforcement, seasonal management, monitoring, or other mitigation;
5. a reasoned determination that the public cost of closure is proportionate to the expected resource benefit.

This standard does not require BLM to prove environmental harm beyond all uncertainty. It requires the agency to explain, using route-specific evidence, why permanent closure is necessary rather than merely beneficial in the abstract.

Routes Proposed for Closure Under Alternative D

Further on in this comment letter, we will provide a separate route-by-route analysis identifying individual segments that should be redesignated. At the alternatives-analysis stage, however, several categories of Alternative D closures warrant presumptive retention.

Routes Closed Primarily for Wilderness-Character Protection

Routes outside congressionally designated wilderness should not be closed merely to reduce visibility, sound, route density, or human presence near WSAs, BLM Natural Areas, or



inventoried LWC units. Within WSAs, longstanding primitive routes should remain open where continued use remains confined to the existing footprint and does not violate the nonimpairment standard.

Alternative D retains 44.3 miles within LWC units but closes four miles compared with Alternative A. It also closes 2.5 miles within BLM Natural Areas. Each of these closures must be reevaluated to determine whether the underlying rationale establishes an actual adverse effect or merely reflects a preference for fewer routes.

The 0.3 miles closed in the Parunuweap Canyon Natural Area should require particular scrutiny because complete elimination of motorized access may produce a disproportionate loss relative to the small geographic footprint involved. Likewise, the one-mile reductions in the Moquith Mountain and Orderville Canyon Natural Areas cannot be adopted without route-specific findings demonstrating incompatibility with the applicable RMP prescriptions.

Routes Serving Connectivity and Loop Functions

Any route identified in BLM's route reports as important for network connectivity must remain open unless the Bureau documents an overriding, unmitigable conflict. Connectivity is not an incidental preference. It prevents dead ends, supports loops, provides alternate evacuation paths, distributes use, reduces duplicative out-and-back mileage, and increases the practical utility of surrounding routes.

Where a short connector is proposed for closure, the Bureau must evaluate the functional mileage lost, not merely the length of the closed segment. Closing one-half mile may effectively render ten or twenty miles of adjoining route impractical as a loop. The Final EA must disclose these network consequences.

Routes Providing Primary Recreation Access

Alternative D retains 265 routes providing primary access to recreation destinations. The remaining closures should be reviewed against Table 6, the recreation-site inventory, route reports, and public-submitted destination information. Routes providing access to dispersed campsites, hunting areas, trailheads, scenic viewpoints, cultural sites, photography locations, geological features, climbing areas, and equestrian staging points should remain open absent a compelling site-specific reason.

A route should not be deemed redundant merely because another route reaches the same generalized geographic area. Different routes may provide different scenery, technical difficulty,



vehicle suitability, camping opportunities, directional connections, or seasonal accessibility. Functional equivalence must be demonstrated rather than assumed.

Routes Providing Access to State Trust Lands, Private Lands, and Authorized Uses

Modified Alternative D must preserve public access routes leading to Utah Trust Lands Administration parcels, private inholdings, and other nonfederal lands where closure would materially impair practical access. Although authorized users may seek case-specific permission to use a closed route, that process is not an adequate substitute for public access and may create administrative delays, uncertainty, and unequal treatment. The Draft EA acknowledges that routes closed to public use may remain available to authorized users, but that distinction reinforces the public-access loss rather than resolving it.

Where a route overlaps an asserted R.S. 2477 right-of-way, the decision should state expressly that the designation does not determine, diminish, prejudice, or provide evidence against the claim. Routes subject to valid existing rights must remain subject to those rights.

Routes with Seasonal or Correctable Resource Concerns

Where the identified concern is seasonal, the remedy should ordinarily be seasonal. Wildlife breeding, winter range, saturated soils, temporary high water, and detectable periods for sensitive plants do not support year-round closure.

Where the concern is physical, the Bureau is required to first consider physical correction. Drainage failures, short unstable grades, route widening, erosion, dust, and stream approaches can often be resolved through engineering, barriers, maintenance, surfacing, or a short reroute within previously disturbed terrain.

Where the concern is behavioral, the Bureau should address the behavior. Unauthorized camping, parking, artifact collection, cross-country travel, high speeds, or litter should be managed through signing, enforcement, barriers, designated pullouts, visitor education, and stewardship partnerships.

Use of OHV-Limited Designations

Alternative D contains no limited-route designations. UPLA supports the general preference for open designations but recognizes that carefully drawn limitations may be preferable to closure where the limitation directly addresses a documented problem. The Bureau should consider limited designations only where necessary and should define them objectively. Appropriate examples may include:

- seasonal restrictions tied to documented wildlife sensitivity;



- wet-weather restrictions based upon measurable soil or route conditions;
- vehicle-width restrictions where route geometry or resource avoidance requires them;
- speed restrictions near cultural sites, residences, trailheads, or sensitive plant populations;
- restrictions on parking, stopping, camping, or staging while retaining through-travel;
- one-way travel where necessary for safety or erosion control.

An e-bike-only designation should not be used as a symbolic substitute for motorized access where the route's established purposes include camping, hunting, family travel, vehicle exploration, or accessibility for persons unable to use bicycles.

Mandatory Implementation Commitments

Modified Alternative D should incorporate enforceable implementation measures from Appendix E and the route reports. The Record of Decision should not describe mitigation merely as discretionary or aspirational. It should identify route-specific commitments, responsible parties, implementation schedules, monitoring standards, and funding priorities.

At minimum, the selected alternative should include:

- installation of clear and durable route signs before closure enforcement begins;
- physical barriers where necessary to prevent route widening or cross-country travel;
- drainage and erosion repair on priority routes;
- monitoring of sensitive cultural, plant, riparian, and wildlife locations;
- coordination with Kane County, Utah state agencies, adjacent land managers, tribes, permittees, and recreation organizations;
- volunteer stewardship agreements for maintenance, monitoring, cleanup, and restoration;
- objective thresholds for temporary restrictions;
- mandatory periodic review of closed and limited routes;
- a process for reopening routes where monitoring demonstrates compatibility;
- transparent public reporting of route-condition and monitoring data.

No Net Loss from Unsupported Closure Rationale

Modified Alternative D should not include closure based solely upon any of the following:

- location within general wildlife habitat;
- proximity to modeled but unverified plant habitat;
- location within an LWC inventory unit;
- visibility or audibility from a WSA or other protected area;
- abstract route-density reduction;
- theoretical user conflict unsupported by documented incidents;
- proximity to a cultural-resource polygon without an adverse-effect finding;



- intersection with an ephemeral drainage absent evidence of sediment delivery;
- location within VRI Class I or II, because VRI classification is not a management prescription;
- perceived redundancy without analysis of loops, experiences, vehicle classes, destinations, and alternate exits;
- potential unlawful behavior that can be addressed through enforcement.

Adaptive Review and Reopening

The final decision should establish a formal adaptive-management process under which closed or limited routes are periodically reconsidered. **Monitoring should not operate solely as a mechanism for imposing additional restrictions. It should also provide a pathway for restoring access where mitigation succeeds, resource conditions improve, new information becomes available, or prior assumptions prove unsupported.**

The Implementation Guide already contemplates monitoring, maintenance, education, enforcement, and reclamation across all alternatives. Modified Alternative D should transform those components into a two-directional management system capable of both restricting and restoring use based upon evidence.

Conclusion Regarding the Alternatives

Alternative A preserves the strongest existing access baseline but does not incorporate all of the route-specific conservation and implementation measures developed through the current process. Alternative B is disproportionately restrictive and inconsistent with balanced multiple-use management. Alternative C preserves considerably more access than Alternative B but still closes routes whose concerns may be resolved through targeted management. Alternative D provides the strongest overall framework, preserves 95% of the evaluated network, and retains the greatest access to recreation destinations among the action alternatives.

Accordingly, BLM should select a Modified Alternative D that:

- retains all 446 miles designated open under Alternative D;
- incorporates additional open designations from Alternative A where Alternative D's closures lack a route-specific showing of unmitigable harm;
- substitutes narrowly tailored limitations for closure where concerns are seasonal, vehicle-specific, behavioral, or correctable;
- preserves routes essential to connectivity, loops, destination access, public safety, State Trust Land access, and accessibility;
- rejects de facto wilderness buffers and closure based solely upon LWC inventory or route density;



- implements enforceable maintenance, monitoring, education, engineering, and stewardship measures;
- provides a defined process for reopening routes based upon improved conditions or new evidence.

This approach would satisfy the purpose and need, comply with the 2008 RMP, protect sensitive resources, preserve public safety, and better fulfill Congress's directive that BLM manage public lands for multiple use rather than progressive elimination of lawful public access.

ROUTE-SPECIFIC ANALYSIS

The following route-specific comments support UPLA's request that BLM adopt a Modified Alternative D. They address independent analysis from UPLA members in comparison with the BLM Draft EA Route Reports. UPLA urges BLM to retain each identified route as open to public motorized use, or to add it to the designated network where it was not previously designated, unless the agency can demonstrate route-specific, documented, and unmitigable harm. The comments distinguish the physical condition and function of each route from the mere presence of a route within a mapped habitat, WSA, LWC, ACEC, visual-resource class, drainage, or cultural-resource analysis area.

Cultural-resource uncertainty should not be converted into a presumption of closure. In its June 29, 2026 Section 106 consultation letter to Mike Reid, the Kanab Field Office stated that 12,799 of 15,451 acres, or 82.8% of the Area of Potential Effects, had been surveyed; that all routes analyzed during route evaluations were included in that surveyed acreage; and that BLM did not believe limited Class II surveys were warranted. The letter further concluded that current use patterns already concentrate travel on the best available routes and that minor traffic-pattern changes generally were not expected to create substantial cultural-resource effects. Those agency findings favor route-specific treatment, monitoring, parking controls, and enforcement over speculative closure.

Route 11: Canaan Mountain / Rosey Canyon Access

The BLM route report describes Route 11 as a 1.16 miles Dual Track Wild Inv Road with low use. The report's designations are Alternative A: Open, Alternative B: Open, Alternative C: Open, Alternative D: Open.

UPLA members report that this is a high value route that provides access toward Canaan Mountain and Rosey Canyon viewpoints. Retaining the established approach prevents an



additional multi-mile walk and preserves practical access for photography, hiking, hunting, and visitors with limited mobility.

BLM's own route evaluation identifies recreation functions including Antler Shed Hunting, Camping, Equestrian, Hiking, Hunting, Photography, and Sightseeing, together with access to Campsite - Undeveloped. These recognized purposes and member-described uses demonstrate that the route is not redundant merely because another road may occur in the same general area. The route report maps the alignment in or near habitat for mule deer, and migratory birds. Habitat overlap alone does not establish measurable displacement or population-level harm, particularly on an existing low-speed route. BLM should use seasonal restrictions near verified sensitive sites, speed controls, no-stopping areas, and monitoring before considering closure.

Nothing in the route report establishes recurring sediment delivery, active gully, or an unmanageable soil failure. BLM should inspect after major storms, maintain drainage, harden isolated problem spots, and restrict use temporarily during saturated conditions rather than impose permanent closure. Although the route intersects VRM Class I terrain, it is an existing primitive linear feature. Visual effects should be evaluated through actual contrast, visibility, route width, and reclamation feasibility, not inferred from GIS overlap. Native-colored materials, limits on widening, and restoration of unauthorized pullouts can retain access while preserving scenic character. The route's location within or near a WSA or inventoried wilderness-character area does not establish impairment. Continued travel confined to a preexisting footprint, without new construction or mechanical expansion, is materially different from creation of a new road and avoids pressure for cross-country bypasses.

UPLA requests that Route 11 be designated or retained OHV-Open under Modified Alternative D. Where a localized concern is verified, BLM should first employ route-specific mitigation: clear signing; barriers or delineators to stop widening and braiding; drainage maintenance; restoration of unauthorized spurs; speed, parking, or camping controls; seasonal restrictions tied to objective conditions; cultural-resource monitoring; and cooperative stewardship with local clubs. Closure is not warranted where the identified concern is generalized, speculative, seasonal, or susceptible to maintenance and enforcement.

Route 11A: Canaan Mountain Access Spur

The BLM route report describes Route 11A as a 0.2 miles Dual Track Primitive Roads with low use. The report's designations are Alternative A: Open, Alternative B: Closed, Alternative C: Closed, Alternative D: Open.



UPLA members report that this short established spur supports access into the Canaan Mountain area. Its closure under Alternatives B and C would remove a useful access component even though Alternative D recognizes that the route can remain open.

BLM's own route evaluation identifies recreation functions including Antler Shed Hunting, Equestrian, Hiking, Hunting, Photography, Sightseeing, and Vehicle Exploring. These recognized purposes and member-described uses demonstrate that the route is not redundant merely because another road may occur in the same general area. The route report maps the alignment in or near habitat for mule deer, and migratory birds. Habitat overlap alone does not establish measurable displacement or population-level harm, particularly on an existing low-speed route. BLM should use seasonal restrictions near verified sensitive sites, speed controls, no-stopping areas, and monitoring before considering closure. Hydrologic concerns should be addressed at the actual crossing or drainage feature through rolling dips, hardened approaches, grade reversals, seasonal wet-weather controls, and prompt repair. A route designation change alone does not stabilize a channel or prevent sediment delivery. Although the route intersects VRM Class I terrain, it is an existing primitive linear feature. Visual effects should be evaluated through actual contrast, visibility, route width, and reclamation feasibility, not inferred from GIS overlap. Native-colored materials, limits on widening, and restoration of unauthorized pullouts can retain access while preserving scenic character.

UPLA requests that Route 11A be designated or retained OHV-Open under Modified Alternative D. Where a localized concern is verified, BLM should first employ route-specific mitigation: clear signing; barriers or delineators to stop widening and braiding; drainage maintenance; restoration of unauthorized spurs; speed, parking, or camping controls; seasonal restrictions tied to objective conditions; cultural-resource monitoring; and cooperative stewardship with local clubs. Closure is not warranted where the identified concern is generalized, speculative, seasonal, or susceptible to maintenance and enforcement.

Route 11B: Canaan Mountain Access Spur

The BLM route report describes Route 11B as a 0.48 miles Dual Track Primitive Route with low use. The report's designations are Alternative A: Open, Alternative B: Closed, Alternative C: Open, Alternative D: Open.

UPLA members report that members use this short primitive spur as part of the Canaan Mountain access system. It preserves route choice and limits the tendency for users to seek informal alternatives when a recognized alignment is removed.



BLM's own route evaluation identifies recreation functions including Antler Shed Hunting, Equestrian, Hiking, Hunting, Photography, Sightseeing, and Vehicle Exploring. These recognized purposes and member-described uses demonstrate that the route is not redundant merely because another road may occur in the same general area. The route report maps the alignment in or near habitat for mule deer and migratory birds. Habitat overlap alone does not establish measurable displacement or population-level harm, particularly on an existing low-speed route. BLM should use seasonal restrictions near verified sensitive sites, speed controls, no-stopping areas, and monitoring before considering closure. Nothing in the route report establishes recurring sediment delivery, active gully, or an unmanageable soil failure. BLM should inspect after major storms, maintain drainage, harden isolated problem spots, and restrict use temporarily during saturated conditions rather than impose permanent closure. Although the route intersects VRM Class I terrain, it is an existing primitive linear feature. Visual effects should be evaluated through actual contrast, visibility, route width, and reclamation feasibility, not inferred from GIS overlap. Native-colored materials, limits on widening, and restoration of unauthorized pullouts can retain access while preserving scenic character. The route's location within or near a WSA or inventoried wilderness-character area does not establish impairment. Continued travel confined to a preexisting footprint, without new construction or mechanical expansion, is materially different from creation of a new road and avoids pressure for cross-country bypasses.

UPLA requests that Route 11B be designated or retained OHV-Open under Modified Alternative D. Where a localized concern is verified, BLM should first employ route-specific mitigation: clear signing; barriers or delineators to stop widening and braiding; drainage maintenance; restoration of unauthorized spurs; speed, parking, or camping controls; seasonal restrictions tied to objective conditions; cultural-resource monitoring; and cooperative stewardship with local clubs. Closure is not warranted where the identified concern is generalized, speculative, seasonal, or susceptible to maintenance and enforcement.

Route 11FC: Elephant Cove Loop Connector

The BLM route report describes Route 11FC as a 0.46 miles Dual Track Primitive Roads with low use. The report's designations are Alternative A: Open, Alternative B: Closed, Alternative C: Open, Alternative D: Open.

UPLA members report that this route helps form a loop with Routes 37A, 30, and 30Z, provides access toward Moccasin Mountain dinosaur-track and Arizona box-canyon destinations, and helps absorb increasing use originating from the Elephant Cove staging area.



BLM's own route evaluation identifies recreation functions including Antler Shed Hunting, Hunting, Sightseeing, Vehicle Exploring, and Woodcutting, together with access to Vista. These recognized purposes and member-described uses demonstrate that the route is not redundant merely because another road may occur in the same general area. The route report maps the alignment in or near habitat for mule deer and migratory birds. Habitat overlap alone does not establish measurable displacement or population-level harm, particularly on an existing low-speed route. BLM should use seasonal restrictions near verified sensitive sites, speed controls, no-stopping areas, and monitoring before considering closure. Nothing in the route report establishes recurring sediment delivery, active gully, or an unmanageable soil failure. BLM should inspect after major storms, maintain drainage, harden isolated problem spots, and restrict use temporarily during saturated conditions rather than impose permanent closure. Although the route intersects VRM Class I terrain, it is an existing primitive linear feature. Visual effects should be evaluated through actual contrast, visibility, route width, and reclamation feasibility, not inferred from GIS overlap. Native-colored materials, limits on widening, and restoration of unauthorized pullouts can retain access while preserving scenic character.

UPLA requests that Route 11FC be designated or retained OHV-Open under Modified Alternative D. Where a localized concern is verified, BLM should first employ route-specific mitigation: clear signing; barriers or delineators to stop widening and braiding; drainage maintenance; restoration of unauthorized spurs; speed, parking, or camping controls; seasonal restrictions tied to objective conditions; cultural-resource monitoring; and cooperative stewardship with local clubs. Closure is not warranted where the identified concern is generalized, speculative, seasonal, or susceptible to maintenance and enforcement.

Route TC1011: Elephant Cove Loop Connector

The BLM route report describes Route TC1011 as a 0.28 miles Dual Track Primitive Roads with low use. The report's designations are Alternative A: Undesignated, Alternative B: Closed, Alternative C: Open, Alternative D: Open. The report also identifies the route as follows: This route is proposed as an addition to the 2008 inventory because it was either missed or provides a purpose and need that has been recognized since the 2008 plan.

UPLA members report that this short connector completes the same local loop function served by Route 11FC. BLM identified it after the 2008 inventory and Alternative D properly recognizes its present purpose and need.

BLM's own route evaluation identifies recreation functions including Antler Shed Hunting, Hunting, Sightseeing, Vehicle Exploring, and Rock Crawling, together with access to Vista.



These recognized purposes and member-described uses demonstrate that the route is not redundant merely because another road may occur in the same general area. The route report maps the alignment in or near habitat for mule deer, and migratory birds. Habitat overlap alone does not establish measurable displacement or population-level harm, particularly on an existing low-speed route. BLM should use seasonal restrictions near verified sensitive sites, speed controls, no-stopping areas, and monitoring before considering closure. Nothing in the route report establishes recurring sediment delivery, active gullyng, or an unmanageable soil failure. BLM should inspect after major storms, maintain drainage, harden isolated problem spots, and restrict use temporarily during saturated conditions rather than impose permanent closure. Although the route intersects VRM Class I terrain, it is an existing primitive linear feature. Visual effects should be evaluated through actual contrast, visibility, route width, and reclamation feasibility, not inferred from GIS overlap. Native-colored materials, limits on widening, and restoration of unauthorized pullouts can retain access while preserving scenic character.

UPLA requests that Route TC1011 be designated or retained OHV-Open under Modified Alternative D. Where a localized concern is verified, BLM should first employ route-specific mitigation: clear signing; barriers or delineators to stop widening and braiding; drainage maintenance; restoration of unauthorized spurs; speed, parking, or camping controls; seasonal restrictions tied to objective conditions; cultural-resource monitoring; and cooperative stewardship with local clubs. Closure is not warranted where the identified concern is generalized, speculative, seasonal, or susceptible to maintenance and enforcement.

Route 17A: 17-to-10Z Connector

The BLM route report describes Route 17A as a 1.63 miles Dual Track Primitive Roads with low use. The report's designations are Alternative A: Open, Alternative B: Closed, Alternative C: Closed, Alternative D: Open.

UPLA members report that members describe this as a useful alternate connector. Keeping it open distributes travel across the existing network and avoids concentrating every trip onto fewer roads.

BLM's own route evaluation identifies recreation functions including Antler Shed Hunting, Hunting, and Vehicle Exploring. These recognized purposes and member-described uses demonstrate that the route is not redundant merely because another road may occur in the same general area. The route report maps the alignment in or near habitat for mule deer, and migratory birds. Habitat overlap alone does not establish measurable displacement or population-level harm, particularly on an existing low-speed route. BLM should use seasonal restrictions near



verified sensitive sites, speed controls, no-stopping areas, and monitoring before considering closure. Hydrologic concerns should be addressed at the actual crossing or drainage feature through rolling dips, hardened approaches, grade reversals, seasonal wet-weather controls, and prompt repair. A route designation change alone does not stabilize a channel or prevent sediment delivery. Although the route intersects VRM Class I terrain, it is an existing primitive linear feature. Visual effects should be evaluated through actual contrast, visibility, route width, and reclamation feasibility, not inferred from GIS overlap. Native-colored materials, limits on widening, and restoration of unauthorized pullouts can retain access while preserving scenic character.

UPLA requests that Route 17A be designated or retained OHV-Open under Modified Alternative D. Where a localized concern is verified, BLM should first employ route-specific mitigation: clear signing; barriers or delineators to stop widening and braiding; drainage maintenance; restoration of unauthorized spurs; speed, parking, or camping controls; seasonal restrictions tied to objective conditions; cultural-resource monitoring; and cooperative stewardship with local clubs. Closure is not warranted where the identified concern is generalized, speculative, seasonal, or susceptible to maintenance and enforcement.

Route 19A: Warriors Walk Access

The BLM route report describes Route 19A as a 0.07 miles Dual Track Primitive Roads with medium use. The report's designations are Alternative A: Open, Alternative B: Open, Alternative C: Open, Alternative D: Open.

UPLA members report that this very short route provides practical access to the locally recognized Warriors Walk cultural and scenic stop. Its continued designation supports interpretation and access without requiring a longer roadside walk or informal parking.

BLM's own route evaluation identifies recreation functions including Woodcutting, Antler Shed Hunting, Canyoneering, Equestrian, Hiking, Hunting, and Photography, together with access to Parking Area - Undeveloped. These recognized purposes and member-described uses demonstrate that the route is not redundant merely because another road may occur in the same general area. The route report maps the alignment in or near habitat for mule deer, and migratory birds. Habitat overlap alone does not establish measurable displacement or population-level harm, particularly on an existing low-speed route. BLM should use seasonal restrictions near verified sensitive sites, speed controls, no-stopping areas, and monitoring before considering closure. Nothing in the route report establishes recurring sediment delivery, active gully, or an unmanageable soil failure. BLM should inspect after major storms, maintain drainage, harden



isolated problem spots, and restrict use temporarily during saturated conditions rather than impose permanent closure. Although the route intersects VRM Class I terrain, it is an existing primitive linear feature. Visual effects should be evaluated through actual contrast, visibility, route width, and reclamation feasibility, not inferred from GIS overlap. Native-colored materials, limits on widening, and restoration of unauthorized pullouts can retain access while preserving scenic character.

UPLA requests that Route 19A be designated or retained OHV-Open under Modified Alternative D. Where a localized concern is verified, BLM should first employ route-specific mitigation: clear signing; barriers or delineators to stop widening and braiding; drainage maintenance; restoration of unauthorized spurs; speed, parking, or camping controls; seasonal restrictions tied to objective conditions; cultural-resource monitoring; and cooperative stewardship with local clubs. Closure is not warranted where the identified concern is generalized, speculative, seasonal, or susceptible to maintenance and enforcement.

Route 18WSA: Barracks / Rock Creek Overlook

The BLM route report describes Route 18WSA as a 2.24 miles Graded Track Primitive Route with medium use. The report's designations are Alternative A: Open, Alternative B: Closed, Alternative C: Open, Alternative D: Open. The report also identifies the route as follows: County Class D. Route designation applies only to those portions of the route located on public.

UPLA members report that users identify this as a favorite lunch and overlook route. It reaches the canyon rim above the East Fork Virgin River and provides the practical starting point for visitors who continue on foot or horseback toward river and cultural-resource destinations.

BLM's own route evaluation identifies recreation functions including Antler Shed Hunting, Hiking, Photography, Hunting, Sightseeing, Vehicle Exploring, and Cultural / Historical Viewing, together with access to Campsite - Undeveloped. These recognized purposes and member-described uses demonstrate that the route is not redundant merely because another road may occur in the same general area. The route report maps the alignment in or near habitat for mule deer, and migratory birds. Habitat overlap alone does not establish measurable displacement or population-level harm, particularly on an existing low-speed route. BLM should use seasonal restrictions near verified sensitive sites, speed controls, no-stopping areas, and monitoring before considering closure. Hydrologic concerns should be addressed at the actual crossing or drainage feature through rolling dips, hardened approaches, grade reversals, seasonal wet-weather controls, and prompt repair. A route designation change alone does not stabilize a channel or prevent sediment delivery. Although the route intersects VRM Class I terrain, it is an



existing primitive linear feature. Visual effects should be evaluated through actual contrast, visibility, route width, and reclamation feasibility, not inferred from GIS overlap. Native-colored materials, limits on widening, and restoration of unauthorized pullouts can retain access while preserving scenic character. The route's location within or near a WSA or inventoried wilderness-character area does not establish impairment. Continued travel confined to a preexisting footprint, without new construction or mechanical expansion, is materially different from creation of a new road and avoids pressure for cross-country bypasses.

UPLA requests that Route 18WSA be designated or retained OHV-Open under Modified Alternative D. Where a localized concern is verified, BLM should first employ route-specific mitigation: clear signing; barriers or delineators to stop widening and braiding; drainage maintenance; restoration of unauthorized spurs; speed, parking, or camping controls; seasonal restrictions tied to objective conditions; cultural-resource monitoring; and cooperative stewardship with local clubs. Closure is not warranted where the identified concern is generalized, speculative, seasonal, or susceptible to maintenance and enforcement.

Route 20M: East Fork Overlook and Hunter Access

The BLM route report describes Route 20M as a 2.49 miles Dual Track Wild Inv Road with low use. The report's designations are Alternative A: Open, Alternative B: Open, Alternative C: Open, Alternative D: Open. The report also identifies the route as follows: County Class D.

UPLA members report that members describe this established route as a hunter and exploration spur leading to a short walk and an overlook above the East Fork Virgin River. It supplies a distinct destination rather than duplicating the experience of the main road.

BLM's own route evaluation identifies recreation functions including Antler Shed Hunting, Camping, Hiking, Hunting, Photography, Sightseeing, and Vehicle Exploring, together with access to Campsite - Undeveloped. These recognized purposes and member-described uses demonstrate that the route is not redundant merely because another road may occur in the same general area. The route report maps the alignment in or near habitat for mule deer, and migratory birds. Habitat overlap alone does not establish measurable displacement or population-level harm, particularly on an existing low-speed route. BLM should use seasonal restrictions near verified sensitive sites, speed controls, no-stopping areas, and monitoring before considering closure. Nothing in the route report establishes recurring sediment delivery, active gully, or an unmanageable soil failure. BLM should inspect after major storms, maintain drainage, harden isolated problem spots, and restrict use temporarily during saturated conditions rather than impose permanent closure. Although the route intersects VRM Class I terrain, it is an existing



primitive linear feature. Visual effects should be evaluated through actual contrast, visibility, route width, and reclamation feasibility, not inferred from GIS overlap. Native-colored materials, limits on widening, and restoration of unauthorized pullouts can retain access while preserving scenic character. The route's location within or near a WSA or inventoried wilderness-character area does not establish impairment. Continued travel confined to a preexisting footprint, without new construction or mechanical expansion, is materially different from creation of a new road and avoids pressure for cross-country bypasses.

UPLA requests that Route 20M be designated or retained OHV-Open under Modified Alternative D. Where a localized concern is verified, BLM should first employ route-specific mitigation: clear signing; barriers or delineators to stop widening and braiding; drainage maintenance; restoration of unauthorized spurs; speed, parking, or camping controls; seasonal restrictions tied to objective conditions; cultural-resource monitoring; and cooperative stewardship with local clubs. Closure is not warranted where the identified concern is generalized, speculative, seasonal, or susceptible to maintenance and enforcement.

Route 20WSA: The Barracks Trail

The BLM route report describes Route 20WSA as a 3.26 miles Graded Track Wild Inv Road with high use. The report's designations are Alternative A: Open, Alternative B: Closed, Alternative C: Open, Alternative D: Open. The report also identifies the route as follows: County Class D. This is the middle portion of route 20 that is within the WSA.

UPLA members report that this is an iconic, high-use component of the Barracks route and a principal connection between the Elephant Cove area, the East Fork Virgin River, and Mount Carmel Junction. Members regularly use it for family rides, camping, scenery, river access, hunting, photography, and trips that support local businesses.

BLM's own route evaluation identifies recreation functions including Antler Shed Hunting, Camping, Canyoneering, Equestrian, Cultural / Historical Viewing, Hiking, and Hunting, together with access to Campsite - Undeveloped, and Parking Area - Undeveloped. These recognized purposes and member-described uses demonstrate that the route is not redundant merely because another road may occur in the same general area. The route report maps the alignment in or near habitat for mule deer, desert bighorn sheep, and migratory birds. Habitat overlap alone does not establish measurable displacement or population-level harm, particularly on an existing low-speed route. BLM should use seasonal restrictions near verified sensitive sites, speed controls, no-stopping areas, and monitoring before considering closure. Hydrologic concerns should be addressed at the actual crossing or drainage feature through rolling dips,



hardened approaches, grade reversals, seasonal wet-weather controls, and prompt repair. A route designation change alone does not stabilize a channel or prevent sediment delivery. Although the route intersects VRM Class I terrain, it is an existing primitive linear feature. Visual effects should be evaluated through actual contrast, visibility, route width, and reclamation feasibility, not inferred from GIS overlap. Native-colored materials, limits on widening, and restoration of unauthorized pullouts can retain access while preserving scenic character. The route's location within or near a WSA or inventoried wilderness-character area does not establish impairment. Continued travel confined to a preexisting footprint, without new construction or mechanical expansion, is materially different from creation of a new road and avoids pressure for cross-country bypasses.

UPLA requests that Route 20WSA be designated or retained OHV-Open under Modified Alternative D. Where a localized concern is verified, BLM should first employ route-specific mitigation: clear signing; barriers or delineators to stop widening and braiding; drainage maintenance; restoration of unauthorized spurs; speed, parking, or camping controls; seasonal restrictions tied to objective conditions; cultural-resource monitoring; and cooperative stewardship with local clubs. Closure is not warranted where the identified concern is generalized, speculative, seasonal, or susceptible to maintenance and enforcement.

Route 25G: Broad Hollow / Shunesburg Mail Drop Spur

The BLM route report describes Route 25G as a 0.23 miles Dual Track Primitive Roads with low use. The report's designations are Alternative A: Open, Alternative B: Closed, Alternative C: Closed, Alternative D: Open.

UPLA members report that this route is used as a short spur to a shaded stop and lunch location while visiting the historic Shunesburg Mail Drop area. Its small footprint and established use make management preferable to closure.

BLM's own route evaluation identifies recreation functions including Antler Shed Hunting, Equestrian, Hiking, Hunting, Photography, Sightseeing, and Vehicle Exploring. These recognized purposes and member-described uses demonstrate that the route is not redundant merely because another road may occur in the same general area. The route report maps the alignment in or near habitat for mule deer, and migratory birds. Habitat overlap alone does not establish measurable displacement or population-level harm, particularly on an existing low-speed route. BLM should use seasonal restrictions near verified sensitive sites, speed controls, no-stopping areas, and monitoring before considering closure. Nothing in the route report establishes recurring sediment delivery, active gully, or an unmanageable soil failure. BLM



should inspect after major storms, maintain drainage, harden isolated problem spots, and restrict use temporarily during saturated conditions rather than impose permanent closure. Although the route intersects VRM Class I terrain, it is an existing primitive linear feature. Visual effects should be evaluated through actual contrast, visibility, route width, and reclamation feasibility, not inferred from GIS overlap. Native-colored materials, limits on widening, and restoration of unauthorized pullouts can retain access while preserving scenic character.

UPLA requests that Route 25G be designated or retained OHV-Open under Modified Alternative D. Where a localized concern is verified, BLM should first employ route-specific mitigation: clear signing; barriers or delineators to stop widening and braiding; drainage maintenance; restoration of unauthorized spurs; speed, parking, or camping controls; seasonal restrictions tied to objective conditions; cultural-resource monitoring; and cooperative stewardship with local clubs. Closure is not warranted where the identified concern is generalized, speculative, seasonal, or susceptible to maintenance and enforcement.

Route 28L: Barracks-Poverty-Zion Viewpoint Spur

The BLM route report describes Route 28L as a 0.92 miles Dual Track Primitive Route with low use. The report's designations are Alternative A: Open, Alternative B: Closed, Alternative C: Open, Alternative D: Open. The report also identifies the route as follows: County Class D.

UPLA members report that this short route reaches a major scenic viewpoint used for lunch, photography, hunting, and family outings. Closure would disproportionately exclude seniors and mobility-limited visitors from a destination that is readily reached on the existing alignment.

BLM's own route evaluation identifies recreation functions including Antler Shed Hunting, Equestrian, Hiking, Hunting, Sightseeing, Wildlife Watching, and Vehicle Exploring, together with access to Vista. These recognized purposes and member-described uses demonstrate that the route is not redundant merely because another road may occur in the same general area. The route report maps the alignment in or near habitat for mule deer, and migratory birds. Habitat overlap alone does not establish measurable displacement or population-level harm, particularly on an existing low-speed route. BLM should use seasonal restrictions near verified sensitive sites, speed controls, no-stopping areas, and monitoring before considering closure. Nothing in the route report establishes recurring sediment delivery, active gully, or an unmanageable soil failure. BLM should inspect after major storms, maintain drainage, harden isolated problem spots, and restrict use temporarily during saturated conditions rather than impose permanent closure. Although the route intersects VRM Class I terrain, it is an existing primitive linear feature. Visual effects should be evaluated through actual contrast, visibility, route width, and



reclamation feasibility, not inferred from GIS overlap. Native-colored materials, limits on widening, and restoration of unauthorized pullouts can retain access while preserving scenic character. The route's location within or near a WSA or inventoried wilderness-character area does not establish impairment. Continued travel confined to a preexisting footprint, without new construction or mechanical expansion, is materially different from creation of a new road and avoids pressure for cross-country bypasses.

UPLA requests that Route 28L be designated or retained OHV-Open under Modified Alternative D. Where a localized concern is verified, BLM should first employ route-specific mitigation: clear signing; barriers or delineators to stop widening and braiding; drainage maintenance; restoration of unauthorized spurs; speed, parking, or camping controls; seasonal restrictions tied to objective conditions; cultural-resource monitoring; and cooperative stewardship with local clubs. Closure is not warranted where the identified concern is generalized, speculative, seasonal, or susceptible to maintenance and enforcement.

Route 28WSA: Harris Mountain-Elephant Gap Connector

The BLM route report describes Route 28WSA as a 0.44 miles Graded Track Primitive Route with high use. The report's designations are Alternative A: Open, Alternative B: Closed, Alternative C: Open, Alternative D: Open. The report also identifies the route as follows: County Class D.

UPLA members report that this is a high-use connector between the Harris Mountain Route 40 system and Route 20 in the Elephant Gap area. Its continued use prevents fragmentation of the recreation network and discourages cross-country shortcuts.

BLM's own route evaluation identifies recreation functions including Antler Shed Hunting, Equestrian, Hiking, Hunting, Sightseeing, Wildlife Watching, and Vehicle Exploring, together with access to Vista. These recognized purposes and member-described uses demonstrate that the route is not redundant merely because another road may occur in the same general area. The route report maps the alignment in or near habitat for mule deer, and migratory birds. Habitat overlap alone does not establish measurable displacement or population-level harm, particularly on an existing low-speed route. BLM should use seasonal restrictions near verified sensitive sites, speed controls, no-stopping areas, and monitoring before considering closure. Nothing in the route report establishes recurring sediment delivery, active gullying, or an unmanageable soil failure. BLM should inspect after major storms, maintain drainage, harden isolated problem spots, and restrict use temporarily during saturated conditions rather than impose permanent closure. The route's location within or near a WSA or inventoried wilderness-character area does



not establish impairment. Continued travel confined to a preexisting footprint, without new construction or mechanical expansion, is materially different from creation of a new road and avoids pressure for cross-country bypasses.

UPLA requests that Route 28WSA be designated or retained OHV-Open under Modified Alternative D. Where a localized concern is verified, BLM should first employ route-specific mitigation: clear signing; barriers or delineators to stop widening and braiding; drainage maintenance; restoration of unauthorized spurs; speed, parking, or camping controls; seasonal restrictions tied to objective conditions; cultural-resource monitoring; and cooperative stewardship with local clubs. Closure is not warranted where the identified concern is generalized, speculative, seasonal, or susceptible to maintenance and enforcement.

Route 31J: White Cliffs Access Spur

The BLM route report describes Route 31J as a 0.55 miles Dual Track Primitive Roads with low use. The report's designations are Alternative A: Open, Alternative B: Closed, Alternative C: Open, Alternative D: Open.

UPLA members report that members value this short route from the paved road to the base of the White Cliffs for hiking, photography, hunting, and scenic access.

BLM's own route evaluation identifies recreation functions including Antler Shed Hunting, Hunting, Sightseeing, and Vehicle Exploring. These recognized purposes and member-described uses demonstrate that the route is not redundant merely because another road may occur in the same general area. The route report maps the alignment in or near habitat for mule deer, and migratory birds. Habitat overlap alone does not establish measurable displacement or population-level harm, particularly on an existing low-speed route. BLM should use seasonal restrictions near verified sensitive sites, speed controls, no-stopping areas, and monitoring before considering closure. Nothing in the route report establishes recurring sediment delivery, active gullying, or an unmanageable soil failure. BLM should inspect after major storms, maintain drainage, harden isolated problem spots, and restrict use temporarily during saturated conditions rather than impose permanent closure. Although the route intersects VRM Class I terrain, it is an existing primitive linear feature. Visual effects should be evaluated through actual contrast, visibility, route width, and reclamation feasibility, not inferred from GIS overlap. Native-colored materials, limits on widening, and restoration of unauthorized pullouts can retain access while preserving scenic character.



UPLA requests that Route 31J be designated or retained OHV-Open under Modified Alternative D. Where a localized concern is verified, BLM should first employ route-specific mitigation: clear signing; barriers or delineators to stop widening and braiding; drainage maintenance; restoration of unauthorized spurs; speed, parking, or camping controls; seasonal restrictions tied to objective conditions; cultural-resource monitoring; and cooperative stewardship with local clubs. Closure is not warranted where the identified concern is generalized, speculative, seasonal, or susceptible to maintenance and enforcement.

Route 32CC: Coral Pink West-Border Loop

The BLM route report describes Route 32CC as a 0.34 miles Dual Track Primitive Roads with low use. The report's designations are Alternative A: Open, Alternative B: Closed, Alternative C: Open, Alternative D: Open.

UPLA members report that together with Routes 32X, 32Z, 32D, and 32E, this route creates a western loop around the Coral Pink Sand Dunes area and provides an important recreation alternative to concentrated use inside the dunes.

BLM's own route evaluation identifies recreation functions including Antler Shed Hunting, Vehicle Exploring, Sightseeing, and Wildlife Watching. These recognized purposes and member-described uses demonstrate that the route is not redundant merely because another road may occur in the same general area. The route report maps the alignment in or near habitat for mule deer, and migratory birds. Habitat overlap alone does not establish measurable displacement or population-level harm, particularly on an existing low-speed route. BLM should use seasonal restrictions near verified sensitive sites, speed controls, no-stopping areas, and monitoring before considering closure. Hydrologic concerns should be addressed at the actual crossing or drainage feature through rolling dips, hardened approaches, grade reversals, seasonal wet-weather controls, and prompt repair. A route designation change alone does not stabilize a channel or prevent sediment delivery. Although the route intersects VRM Class I terrain, it is an existing primitive linear feature. Visual effects should be evaluated through actual contrast, visibility, route width, and reclamation feasibility, not inferred from GIS overlap. Native-colored materials, limits on widening, and restoration of unauthorized pullouts can retain access while preserving scenic character.

UPLA requests that Route 32CC be designated or retained OHV-Open under Modified Alternative D. Where a localized concern is verified, BLM should first employ route-specific mitigation: clear signing; barriers or delineators to stop widening and braiding; drainage maintenance; restoration of unauthorized spurs; speed, parking, or camping controls; seasonal



restrictions tied to objective conditions; cultural-resource monitoring; and cooperative stewardship with local clubs. Closure is not warranted where the identified concern is generalized, speculative, seasonal, or susceptible to maintenance and enforcement.

Route 32X: Coral Pink West-Border Loop

The BLM route report describes Route 32X as a 0.07 miles Dual Track Primitive Roads with low use. The report's designations are Alternative A: Open, Alternative B: Closed, Alternative C: Open, Alternative D: Open.

UPLA members report that this short connector is small in mileage but important in function because it helps preserve continuity of the Coral Pink west-side loop.

BLM's own route evaluation identifies recreation functions including Antler Shed Hunting, Vehicle Exploring, Sightseeing, and Wildlife Watching. These recognized purposes and member-described uses demonstrate that the route is not redundant merely because another road may occur in the same general area. The route report maps the alignment in or near habitat for mule deer, and migratory birds. Habitat overlap alone does not establish measurable displacement or population-level harm, particularly on an existing low-speed route. BLM should use seasonal restrictions near verified sensitive sites, speed controls, no-stopping areas, and monitoring before considering closure. Nothing in the route report establishes recurring sediment delivery, active gully, or an unmanageable soil failure. BLM should inspect after major storms, maintain drainage, harden isolated problem spots, and restrict use temporarily during saturated conditions rather than impose permanent closure. Although the route intersects VRM Class I terrain, it is an existing primitive linear feature. Visual effects should be evaluated through actual contrast, visibility, route width, and reclamation feasibility, not inferred from GIS overlap. Native-colored materials, limits on widening, and restoration of unauthorized pullouts can retain access while preserving scenic character. The route's location within or near a WSA or inventoried wilderness-character area does not establish impairment. Continued travel confined to a preexisting footprint, without new construction or mechanical expansion, is materially different from creation of a new road and avoids pressure for cross-country bypasses.

UPLA requests that Route 32X be designated or retained OHV-Open under Modified Alternative D. Where a localized concern is verified, BLM should first employ route-specific mitigation: clear signing; barriers or delineators to stop widening and braiding; drainage maintenance; restoration of unauthorized spurs; speed, parking, or camping controls; seasonal restrictions tied to objective conditions; cultural-resource monitoring; and cooperative stewardship with local



clubs. Closure is not warranted where the identified concern is generalized, speculative, seasonal, or susceptible to maintenance and enforcement.

Route 32Z: Coral Pink West-Border Loop

The BLM route report describes Route 32Z as a 0.27 miles Dual Track Primitive Roads with low use. The report's designations are Alternative A: Open, Alternative B: Open, Alternative C: Open, Alternative D: Open. The report also identifies the route as follows: County Class D.

UPLA members report that this short Kane County route helps complete the west-side Coral Pink loop and retains use on an established alignment rather than forcing repeated travel or informal bypasses.

BLM's own route evaluation identifies recreation functions including Antler Shed Hunting, Vehicle Exploring, Sightseeing, and Wildlife Watching. These recognized purposes and member-described uses demonstrate that the route is not redundant merely because another road may occur in the same general area. The route report maps the alignment in or near habitat for mule deer, and migratory birds. Habitat overlap alone does not establish measurable displacement or population-level harm, particularly on an existing low-speed route. BLM should use seasonal restrictions near verified sensitive sites, speed controls, no-stopping areas, and monitoring before considering closure. Nothing in the route report establishes recurring sediment delivery, active gullyng, or an unmanageable soil failure. BLM should inspect after major storms, maintain drainage, harden isolated problem spots, and restrict use temporarily during saturated conditions rather than impose permanent closure. Although the route intersects VRM Class I terrain, it is an existing primitive linear feature. Visual effects should be evaluated through actual contrast, visibility, route width, and reclamation feasibility, not inferred from GIS overlap. Native-colored materials, limits on widening, and restoration of unauthorized pullouts can retain access while preserving scenic character. The route's location within or near a WSA or inventoried wilderness-character area does not establish impairment. Continued travel confined to a preexisting footprint, without new construction or mechanical expansion, is materially different from creation of a new road and avoids pressure for cross-country bypasses.

UPLA requests that Route 32Z be designated or retained OHV-Open under Modified Alternative D. Where a localized concern is verified, BLM should first employ route-specific mitigation: clear signing; barriers or delineators to stop widening and braiding; drainage maintenance; restoration of unauthorized spurs; speed, parking, or camping controls; seasonal restrictions tied to objective conditions; cultural-resource monitoring; and cooperative stewardship with local



clubs. Closure is not warranted where the identified concern is generalized, speculative, seasonal, or susceptible to maintenance and enforcement.

Route 32D: Coral Pink South Connector

The BLM route report describes Route 32D as a 3.94 miles Dual Track Primitive Roads with low use. The report's designations are Alternative A: Open, Alternative B: Closed, Alternative C: Open, Alternative D: Open.

UPLA members report that members report that this established sandy route connects Routes 32E, 32B, and 32CC and creates a desirable loop between Coral Pink Sand Dunes and the Moccasin Mountain area. With increasing use at Coral Pink and Elephant Cove staging areas, this route distributes rather than concentrates impacts.

BLM's own route evaluation identifies recreation functions including Antler Shed Hunting, Vehicle Exploring, Sightseeing, Wildlife Watching, and Woodcutting, together with access to Vista. These recognized purposes and member-described uses demonstrate that the route is not redundant merely because another road may occur in the same general area. The route report maps the alignment in or near habitat for mule deer, and migratory birds. Habitat overlap alone does not establish measurable displacement or population-level harm, particularly on an existing low-speed route. BLM should use seasonal restrictions near verified sensitive sites, speed controls, no-stopping areas, and monitoring before considering closure. Nothing in the route report establishes recurring sediment delivery, active gullying, or an unmanageable soil failure. BLM should inspect after major storms, maintain drainage, harden isolated problem spots, and restrict use temporarily during saturated conditions rather than impose permanent closure. Although the route intersects VRM Class I terrain, it is an existing primitive linear feature. Visual effects should be evaluated through actual contrast, visibility, route width, and reclamation feasibility, not inferred from GIS overlap. Native-colored materials, limits on widening, and restoration of unauthorized pullouts can retain access while preserving scenic character.

UPLA requests that Route 32D be designated or retained OHV-Open under Modified Alternative D. Where a localized concern is verified, BLM should first employ route-specific mitigation: clear signing; barriers or delineators to stop widening and braiding; drainage maintenance; restoration of unauthorized spurs; speed, parking, or camping controls; seasonal restrictions tied to objective conditions; cultural-resource monitoring; and cooperative stewardship with local clubs. Closure is not warranted where the identified concern is generalized, speculative, seasonal, or susceptible to maintenance and enforcement.



Route 32E: Coral Pink West Connector

The BLM route report describes Route 32E as a 0.51 miles Dual Track Primitive Roads with low use. The report's designations are Alternative A: Open, Alternative B: Closed, Alternative C: Open, Alternative D: Open.

UPLA members report that this short connector links the Route 32 system with Route 32D near Coral Pink Sand Dunes State Park. Closing it would compress the same demand onto fewer roads and degrade loop functionality.

BLM's own route evaluation identifies recreation functions including Antler Shed Hunting, Vehicle Exploring, Sightseeing, Wildlife Watching, and Woodcutting. These recognized purposes and member-described uses demonstrate that the route is not redundant merely because another road may occur in the same general area. The route report maps the alignment in or near habitat for mule deer, and migratory birds. Habitat overlap alone does not establish measurable displacement or population-level harm, particularly on an existing low-speed route. BLM should use seasonal restrictions near verified sensitive sites, speed controls, no-stopping areas, and monitoring before considering closure. Nothing in the route report establishes recurring sediment delivery, active gully, or an unmanageable soil failure. BLM should inspect after major storms, maintain drainage, harden isolated problem spots, and restrict use temporarily during saturated conditions rather than impose permanent closure. Although the route intersects VRM Class I terrain, it is an existing primitive linear feature. Visual effects should be evaluated through actual contrast, visibility, route width, and reclamation feasibility, not inferred from GIS overlap. Native-colored materials, limits on widening, and restoration of unauthorized pullouts can retain access while preserving scenic character.

UPLA requests that Route 32E be designated or retained OHV-Open under Modified Alternative D. Where a localized concern is verified, BLM should first employ route-specific mitigation: clear signing; barriers or delineators to stop widening and braiding; drainage maintenance; restoration of unauthorized spurs; speed, parking, or camping controls; seasonal restrictions tied to objective conditions; cultural-resource monitoring; and cooperative stewardship with local clubs. Closure is not warranted where the identified concern is generalized, speculative, seasonal, or susceptible to maintenance and enforcement.



Route 40P: Harris Mountain Challenge Connector

The BLM route report describes Route 40P as a 0.6 miles Dual Track Primitive Roads with low use. The report's designations are Alternative A: Closed, Alternative B: Closed, Alternative C: Open, Alternative D: Open.

UPLA members report that members describe this as an enjoyable alternate connection containing forested, sandy, and rocky terrain. It provides route diversity and a manageable challenge while connecting the Harris Mountain network.

BLM's own route evaluation identifies recreation functions including Hunting, Photography, Sightseeing, Vehicle Exploring, and Antler Shed Hunting. These recognized purposes and member-described uses demonstrate that the route is not redundant merely because another road may occur in the same general area. The route report maps the alignment in or near habitat for mule deer, and migratory birds. Habitat overlap alone does not establish measurable displacement or population-level harm, particularly on an existing low-speed route. BLM should use seasonal restrictions near verified sensitive sites, speed controls, no-stopping areas, and monitoring before considering closure. Nothing in the route report establishes recurring sediment delivery, active gullying, or an unmanageable soil failure. BLM should inspect after major storms, maintain drainage, harden isolated problem spots, and restrict use temporarily during saturated conditions rather than impose permanent closure. Although the route intersects VRM Class I terrain, it is an existing primitive linear feature. Visual effects should be evaluated through actual contrast, visibility, route width, and reclamation feasibility, not inferred from GIS overlap. Native-colored materials, limits on widening, and restoration of unauthorized pullouts can retain access while preserving scenic character.

UPLA requests that Route 40P be designated or retained OHV-Open under Modified Alternative D. Where a localized concern is verified, BLM should first employ route-specific mitigation: clear signing; barriers or delineators to stop widening and braiding; drainage maintenance; restoration of unauthorized spurs; speed, parking, or camping controls; seasonal restrictions tied to objective conditions; cultural-resource monitoring; and cooperative stewardship with local clubs. Closure is not warranted where the identified concern is generalized, speculative, seasonal, or susceptible to maintenance and enforcement.



Route 40Q: Bay Bill / Zion Overlook

The BLM route report describes Route 40Q as a 2.69 miles Dual Track Primitive Route with low use. The report's designations are Alternative A: Open, Alternative B: Closed, Alternative C: Open, Alternative D: Open. The report also identifies the route as follows: County Class D.

UPLA members report that members consistently identify this route as one of the best overlooks in the entire Trail Canyon TMA. Families use it for picnics and sightseeing, visitors bring out-of-state guests to experience the panoramic view, and older and disabled users rely on motorized access. It also provides access toward State Trust lands.

BLM's own route evaluation identifies recreation functions including Antler Shed Hunting, Equestrian, Hiking, Hunting, Sightseeing, Wildlife Watching, and Vehicle Exploring, together with access to Vista. These recognized purposes and member-described uses demonstrate that the route is not redundant merely because another road may occur in the same general area. The route report maps the alignment in or near habitat for mule deer, and migratory birds. Habitat overlap alone does not establish measurable displacement or population-level harm, particularly on an existing low-speed route. BLM should use seasonal restrictions near verified sensitive sites, speed controls, no-stopping areas, and monitoring before considering closure. Nothing in the route report establishes recurring sediment delivery, active gullying, or an unmanageable soil failure. BLM should inspect after major storms, maintain drainage, harden isolated problem spots, and restrict use temporarily during saturated conditions rather than impose permanent closure. Although the route intersects VRM Class I terrain, it is an existing primitive linear feature. Visual effects should be evaluated through actual contrast, visibility, route width, and reclamation feasibility, not inferred from GIS overlap. Native-colored materials, limits on widening, and restoration of unauthorized pullouts can retain access while preserving scenic character. The route's location within or near a WSA or inventoried wilderness-character area does not establish impairment. Continued travel confined to a preexisting footprint, without new construction or mechanical expansion, is materially different from creation of a new road and avoids pressure for cross-country bypasses.

UPLA requests that Route 40Q be designated or retained OHV-Open under Modified Alternative D. Where a localized concern is verified, BLM should first employ route-specific mitigation: clear signing; barriers or delineators to stop widening and braiding; drainage maintenance; restoration of unauthorized spurs; speed, parking, or camping controls; seasonal restrictions tied to objective conditions; cultural-resource monitoring; and cooperative stewardship with local clubs. Closure is not warranted where the identified concern is generalized, speculative, seasonal, or susceptible to maintenance and enforcement.



Route 40U: Dry Lake Return / Harris Mountain Challenge Route

The BLM route report describes Route 40U as a 1.61 miles Dual Track Primitive Route with low use. The report's designations are Alternative A: Open, Alternative B: Closed, Alternative C: Open, Alternative D: Open. The report also identifies the route as follows: County Class D.

UPLA members report that members value this route as a more challenging return option toward the Dry Lake staging area, with varied rocky, sandy, and forested terrain. It adds meaningful diversity without requiring a new disturbance.

BLM's own route evaluation identifies recreation functions including Antler Shed Hunting, Equestrian, Hiking, Hunting, Sightseeing, Wildlife Watching, and Vehicle Exploring, together with access to Vista. These recognized purposes and member-described uses demonstrate that the route is not redundant merely because another road may occur in the same general area. The route report maps the alignment in or near habitat for mule deer, and migratory birds. Habitat overlap alone does not establish measurable displacement or population-level harm, particularly on an existing low-speed route. BLM should use seasonal restrictions near verified sensitive sites, speed controls, no-stopping areas, and monitoring before considering closure. Hydrologic concerns should be addressed at the actual crossing or drainage feature through rolling dips, hardened approaches, grade reversals, seasonal wet-weather controls, and prompt repair. A route designation change alone does not stabilize a channel or prevent sediment delivery. Although the route intersects VRM Class I terrain, it is an existing primitive linear feature. Visual effects should be evaluated through actual contrast, visibility, route width, and reclamation feasibility, not inferred from GIS overlap. Native-colored materials, limits on widening, and restoration of unauthorized pullouts can retain access while preserving scenic character. The route's location within or near a WSA or inventoried wilderness-character area does not establish impairment. Continued travel confined to a preexisting footprint, without new construction or mechanical expansion, is materially different from creation of a new road and avoids pressure for cross-country bypasses.

UPLA requests that Route 40U be designated or retained OHV-Open under Modified Alternative D. Where a localized concern is verified, BLM should first employ route-specific mitigation: clear signing; barriers or delineators to stop widening and braiding; drainage maintenance; restoration of unauthorized spurs; speed, parking, or camping controls; seasonal restrictions tied to objective conditions; cultural-resource monitoring; and cooperative stewardship with local clubs. Closure is not warranted where the identified concern is generalized, speculative, seasonal, or susceptible to maintenance and enforcement.



Route 45F: Route 45-to-48 Connector

The BLM route report describes Route 45F as a 0.27 miles Dual Track Primitive Roads with medium use. The report's designations are Alternative A: Open, Alternative B: Closed, Alternative C: Open, Alternative D: Open.

UPLA members report that this established connector preserves continuity between Routes 45 and 48 and helps concentrate travel on an identifiable route rather than dispersing it across adjacent ground.

BLM's own route evaluation identifies recreation functions including Equestrian, Hiking, Hunting, Sightseeing, Wildlife Watching, Vehicle Exploring, and Woodcutting. These recognized purposes and member-described uses demonstrate that the route is not redundant merely because another road may occur in the same general area. The route report maps the alignment in or near habitat for mule deer, and migratory birds. Habitat overlap alone does not establish measurable displacement or population-level harm, particularly on an existing low-speed route. BLM should use seasonal restrictions near verified sensitive sites, speed controls, no-stopping areas, and monitoring before considering closure. Hydrologic concerns should be addressed at the actual crossing or drainage feature through rolling dips, hardened approaches, grade reversals, seasonal wet-weather controls, and prompt repair. A route designation change alone does not stabilize a channel or prevent sediment delivery. Although the route intersects VRM Class I terrain, it is an existing primitive linear feature. Visual effects should be evaluated through actual contrast, visibility, route width, and reclamation feasibility, not inferred from GIS overlap. Native-colored materials, limits on widening, and restoration of unauthorized pullouts can retain access while preserving scenic character.

UPLA requests that Route 45F be designated or retained OHV-Open under Modified Alternative D. Where a localized concern is verified, BLM should first employ route-specific mitigation: clear signing; barriers or delineators to stop widening and braiding; drainage maintenance; restoration of unauthorized spurs; speed, parking, or camping controls; seasonal restrictions tied to objective conditions; cultural-resource monitoring; and cooperative stewardship with local clubs. Closure is not warranted where the identified concern is generalized, speculative, seasonal, or susceptible to maintenance and enforcement.

Route 51: Coral Pink Overlook and Rock-Art Route

The BLM route report describes Route 51 as a 5.9 miles Graded Track Primitive Route with medium use. The report's designations are Alternative A: Open, Alternative B: Closed,



Alternative C: Open, Alternative D: Open. The report also identifies the route as follows: County Class D.

UPLA members report that this is a major scenic and educational route used for four-wheel-drive travel, OHV recreation, camping, hunting, hiking, photography, and access to a promoted rock-art hike. Members also identify connections to State Trust lands and Coral Pink Sand Dunes State Park.

BLM's own route evaluation identifies recreation functions including Antler Shed Hunting, Hiking, Photography, Hunting, Sightseeing, Vehicle Exploring, and Cultural / Historical Viewing, together with access to Campsite - Undeveloped, and Technical Vehicle Site / Trail. These recognized purposes and member-described uses demonstrate that the route is not redundant merely because another road may occur in the same general area. The route report maps the alignment in or near habitat for mule deer, and migratory birds. Habitat overlap alone does not establish measurable displacement or population-level harm, particularly on an existing low-speed route. BLM should use seasonal restrictions near verified sensitive sites, speed controls, no-stopping areas, and monitoring before considering closure. Hydrologic concerns should be addressed at the actual crossing or drainage feature through rolling dips, hardened approaches, grade reversals, seasonal wet-weather controls, and prompt repair. A route designation change alone does not stabilize a channel or prevent sediment delivery. Although the route intersects VRM Class I terrain, it is an existing primitive linear feature. Visual effects should be evaluated through actual contrast, visibility, route width, and reclamation feasibility, not inferred from GIS overlap. Native-colored materials, limits on widening, and restoration of unauthorized pullouts can retain access while preserving scenic character. The route's location within or near a WSA or inventoried wilderness-character area does not establish impairment. Continued travel confined to a preexisting footprint, without new construction or mechanical expansion, is materially different from creation of a new road and avoids pressure for cross-country bypasses.

UPLA requests that Route 51 be designated or retained OHV-Open under Modified Alternative D. Where a localized concern is verified, BLM should first employ route-specific mitigation: clear signing; barriers or delineators to stop widening and braiding; drainage maintenance; restoration of unauthorized spurs; speed, parking, or camping controls; seasonal restrictions tied to objective conditions; cultural-resource monitoring; and cooperative stewardship with local clubs. Closure is not warranted where the identified concern is generalized, speculative, seasonal, or susceptible to maintenance and enforcement.



Route 52: Hell Dive Loop Connector

The BLM route report describes Route 52 as a 1.88 miles Graded Track Primitive Route with medium use. The report's designations are Alternative A: Open, Alternative B: Closed, Alternative C: Open, Alternative D: Open. The report also identifies the route as follows: County Class D. Documented way 1979 603 inventory. Do Not Designate - Route is in WSA.

UPLA members report that route 52 is indispensable to Route 51 because it completes the loop to the Hell Dive Canyon overlook. Members value its varied terrain, overlook, nearby spring, and access to a short rock-art hike. Closing 52 would convert 51 into a less functional out-and-back route.

BLM's own route evaluation identifies recreation functions including Antler Shed Hunting, Hiking, Photography, Hunting, Sightseeing, Vehicle Exploring, and Cultural / Historical Viewing, together with access to Campsite - Undeveloped, and Technical Vehicle Site / Trail. These recognized purposes and member-described uses demonstrate that the route is not redundant merely because another road may occur in the same general area. The route report maps the alignment in or near habitat for mule deer, and migratory birds. Habitat overlap alone does not establish measurable displacement or population-level harm, particularly on an existing low-speed route. BLM should use seasonal restrictions near verified sensitive sites, speed controls, no-stopping areas, and monitoring before considering closure. Hydrologic concerns should be addressed at the actual crossing or drainage feature through rolling dips, hardened approaches, grade reversals, seasonal wet-weather controls, and prompt repair. A route designation change alone does not stabilize a channel or prevent sediment delivery. Although the route intersects VRM Class I terrain, it is an existing primitive linear feature. Visual effects should be evaluated through actual contrast, visibility, route width, and reclamation feasibility, not inferred from GIS overlap. Native-colored materials, limits on widening, and restoration of unauthorized pullouts can retain access while preserving scenic character. The route's location within a WSA or inventoried wilderness-character area does not establish impairment. Continued travel confined to a preexisting footprint, without new construction or mechanical expansion, is materially different from creation of a new road and avoids pressure for cross-country bypasses.

UPLA requests that Route 52 be designated or retained OHV-Open under Modified Alternative D. Where a localized concern is verified, BLM should first employ route-specific mitigation: clear signing; barriers or delineators to stop widening and braiding; drainage maintenance; restoration of unauthorized spurs; speed, parking, or camping controls; seasonal restrictions tied to objective conditions; cultural-resource monitoring; and cooperative stewardship with local



clubs. Closure is not warranted where the identified concern is generalized, speculative, seasonal, or susceptible to maintenance and enforcement.

Route 53: Fredonia Municipal Water Access Road

The BLM route report describes Route 53 as a 5.12 miles Graded Track Wild Inv Road with high use. The report's designations are Alternative A: Open, Alternative B: Open, Alternative C: Open, Alternative D: Open.

UPLA members report that the priority list reports that private-property gates have prevented ordinary public passage for many years, but the route remains important for access associated with wells serving the Town of Fredonia. BLM should retain the open designation, accurately disclose the private-access constraint, and coordinate rather than erase the transportation function.

BLM's own route evaluation identifies recreation functions including Cultural / Historical Viewing, Canyoneering, Equestrian, Hunting, Hiking, Bicycling / Mountain Biking, and Photography. These recognized purposes and member-described uses demonstrate that the route is not redundant merely because another road may occur in the same general area. The route report maps the alignment in or near habitat for mule deer, desert bighorn sheep, and migratory birds. Habitat overlap alone does not establish measurable displacement or population-level harm, particularly on an existing low-speed route. BLM should use seasonal restrictions near verified sensitive sites, speed controls, no-stopping areas, and monitoring before considering closure. Hydrologic concerns should be addressed at the actual crossing or drainage feature through rolling dips, hardened approaches, grade reversals, seasonal wet-weather controls, and prompt repair. A route designation change alone does not stabilize a channel or prevent sediment delivery. Although the route intersects VRM Class I terrain, it is an existing primitive linear feature. Visual effects should be evaluated through actual contrast, visibility, route width, and reclamation feasibility, not inferred from GIS overlap. Native-colored materials, limits on widening, and restoration of unauthorized pullouts can retain access while preserving scenic character. The route's location within or near a WSA or inventoried wilderness-character area does not establish impairment. Continued travel confined to a preexisting footprint, without new construction or mechanical expansion, is materially different from creation of a new road and avoids pressure for cross-country bypasses.

UPLA requests that Route 53 be designated or retained OHV-Open under Modified Alternative D. Where a localized concern is verified, BLM should first employ route-specific mitigation: clear signing; barriers or delineators to stop widening and braiding; drainage maintenance;



restoration of unauthorized spurs; speed, parking, or camping controls; seasonal restrictions tied to objective conditions; cultural-resource monitoring; and cooperative stewardship with local clubs. Closure is not warranted where the identified concern is generalized, speculative, seasonal, or susceptible to maintenance and enforcement.

Route 60G: Route 60-to-60H Connector

The BLM route report describes Route 60G as a 0.35 miles Dual Track Primitive Roads with low use. The report's designations are Alternative A: Open, Alternative B: Closed, Alternative C: Open, Alternative D: Open. The report also identifies the route as follows: County Class D.

UPLA members report that this short Kane County connector provides continuity in the Coral Pink and Sand Dunes network and concentrates use on a recognized sandy alignment.

BLM's own route evaluation identifies recreation functions including Antler Shed Hunting, Hunting, Woodcutting, Vehicle Exploring, Wildlife Watching, Hiking, and Photography, together with access to Vista. These recognized purposes and member-described uses demonstrate that the route is not redundant merely because another road may occur in the same general area. The route report maps the alignment in or near habitat for mule deer, and migratory birds. Habitat overlap alone does not establish measurable displacement or population-level harm, particularly on an existing low-speed route. BLM should use seasonal restrictions near verified sensitive sites, speed controls, no-stopping areas, and monitoring before considering closure. Nothing in the route report establishes recurring sediment delivery, active gully, or an unmanageable soil failure. BLM should inspect after major storms, maintain drainage, harden isolated problem spots, and restrict use temporarily during saturated conditions rather than impose permanent closure. Although the route intersects VRM Class I terrain, it is an existing primitive linear feature. Visual effects should be evaluated through actual contrast, visibility, route width, and reclamation feasibility, not inferred from GIS overlap. Native-colored materials, limits on widening, and restoration of unauthorized pullouts can retain access while preserving scenic character.

UPLA requests that Route 60G be designated or retained OHV-Open under Modified Alternative D. Where a localized concern is verified, BLM should first employ route-specific mitigation: clear signing; barriers or delineators to stop widening and braiding; drainage maintenance; restoration of unauthorized spurs; speed, parking, or camping controls; seasonal restrictions tied to objective conditions; cultural-resource monitoring; and cooperative stewardship with local clubs. Closure is not warranted where the identified concern is generalized, speculative, seasonal, or susceptible to maintenance and enforcement.



Route 61A: Peekaboo Staging Area Connector

UPLA members report that this is a critical public-safety connector between the expanded Peekaboo staging area and the west-side trail network. Members warn that closure may force OHVs onto or alongside high-speed U.S. Highway 89. That foreseeable safety consequence substantially outweighs any generalized closure rationale.

The absence of a readily identifiable Route 61A report in the compiled Draft EA Route Reports creates a material record and public-safety concern. BLM should verify the GIS identifier, disclose the route's length, condition, jurisdiction, resource setting, and proposed designation, and analyze the comparative risk of forcing OHVs onto U.S. Highway 89. Until that analysis is completed, closure under Alternatives B, C, or D is unsupported. Appropriate mitigation includes clear wayfinding from the staging area, speed controls, fencing or delineators, and monitoring of the connector.

UPLA requests that Route 61A be added to Modified Alternative D as OHV-Open. A short, managed connector that separates low-speed recreation vehicles from a 65-mile-per-hour highway is a direct public-safety measure and an essential network function.

Route 70C: Route 70B-to-70D Scenic Connector

The BLM route report describes Route 70C as a 0.88 miles Dual Track Wild Inv Road with medium use. The report's designations are Alternative A: Open, Alternative B: Open, Alternative C: Open, Alternative D: Open. The report also identifies the route as follows: County Class D.

UPLA members report that this Kane County connector forms a local scenic loop between Routes 70B and 70D. Retention avoids an unnecessary out-and-back configuration and supports visitor distribution.

BLM's own route evaluation identifies recreation functions including Antler Shed Hunting, Backpacking, Bicycling / Mountain Biking, Birding, Equestrian, Hiking, and Hunting. These recognized purposes and member-described uses demonstrate that the route is not redundant merely because another road may occur in the same general area. The route report maps the alignment in or near habitat for mule deer, and migratory birds. Habitat overlap alone does not establish measurable displacement or population-level harm, particularly on an existing low-speed route. BLM should use seasonal restrictions near verified sensitive sites, speed controls, no-stopping areas, and monitoring before considering closure. Hydrologic concerns should be addressed at the actual crossing or drainage feature through rolling dips, hardened approaches,



grade reversals, seasonal wet-weather controls, and prompt repair. A route designation change alone does not stabilize a channel or prevent sediment delivery. Although the route intersects VRM Class I terrain, it is an existing primitive linear feature. Visual effects should be evaluated through actual contrast, visibility, route width, and reclamation feasibility, not inferred from GIS overlap. Native-colored materials, limits on widening, and restoration of unauthorized pullouts can retain access while preserving scenic character. The route's location within or near a WSA or inventoried wilderness-character area does not establish impairment. Continued travel confined to a preexisting footprint, without new construction or mechanical expansion, is materially different from creation of a new road and avoids pressure for cross-country bypasses.

UPLA requests that Route 70C be designated or retained OHV-Open under Modified Alternative D. Where a localized concern is verified, BLM should first employ route-specific mitigation: clear signing; barriers or delineators to stop widening and braiding; drainage maintenance; restoration of unauthorized spurs; speed, parking, or camping controls; seasonal restrictions tied to objective conditions; cultural-resource monitoring; and cooperative stewardship with local clubs. Closure is not warranted where the identified concern is generalized, speculative, seasonal, or susceptible to maintenance and enforcement.

Route 70WSA: Poverty Canyon Scenic Route

The BLM route report describes Route 70WSA as a 3.74 miles Dual Track Primitive Route with high use. The report's designations are Alternative A: Open, Alternative B: Closed, Alternative C: Open, Alternative D: Open. The report also identifies the route as follows: County Class D. This is the WSA interior portion of route 70. Do Not Designate - Route is in WSA.

UPLA members report that this high-use route provides spectacular scenery and modest technical challenge. The UT/AZ ATV Club reports a history of hand-tool stewardship and annual monitoring of a small spot that occasionally needs rock or log stabilization. BLM has also authorized organized rides on portions of the route.

BLM's own route evaluation identifies recreation functions including Antler Shed Hunting, Camping, Canyoneering, Equestrian, Hiking, Hunting, and Photography, together with access to Campsite - Undeveloped, and Technical Vehicle Site / Trail. These recognized purposes and member-described uses demonstrate that the route is not redundant merely because another road may occur in the same general area. The route report maps the alignment in or near habitat for mule deer, desert bighorn sheep, and migratory birds. Habitat overlap alone does not establish measurable displacement or population-level harm, particularly on an existing low-speed route. BLM should use seasonal restrictions near verified sensitive sites, speed controls, no-stopping



areas, and monitoring before considering closure. Hydrologic concerns should be addressed at the actual crossing or drainage feature through rolling dips, hardened approaches, grade reversals, seasonal wet-weather controls, and prompt repair. A route designation change alone does not stabilize a channel or prevent sediment delivery. Although the route intersects VRM Class I terrain, it is an existing primitive linear feature. Visual effects should be evaluated through actual contrast, visibility, route width, and reclamation feasibility, not inferred from GIS overlap. Native-colored materials, limits on widening, and restoration of unauthorized pullouts can retain access while preserving scenic character. The route's location within a WSA or inventoried wilderness-character area does not establish impairment. Continued travel confined to a preexisting footprint, without new construction or mechanical expansion, is materially different from creation of a new road and avoids pressure for cross-country bypasses.

UPLA requests that Route 70WSA be designated or retained OHV-Open under Modified Alternative D. Where a localized concern is verified, BLM should first employ route-specific mitigation: clear signing; barriers or delineators to stop widening and braiding; drainage maintenance; restoration of unauthorized spurs; speed, parking, or camping controls; seasonal restrictions tied to objective conditions; cultural-resource monitoring; and cooperative stewardship with local clubs. Closure is not warranted where the identified concern is generalized, speculative, seasonal, or susceptible to maintenance and enforcement.

Route 72D: Mineral Gulch Access

The BLM route report describes Route 72D as a 1.43 miles Dual Track Primitive Route with low use. The report's designations are Alternative A: Open, Alternative B: Closed, Alternative C: Open, Alternative D: Open. The report also identifies the route as follows: County Class D.

UPLA members report that members value this low-use route for hunting, biking, hiking, canyon views, and access into the Mineral Gulch area. Its low use and established tread favor continued management rather than closure.

BLM's own route evaluation identifies recreation functions including Antler Shed Hunting, Equestrian, Hiking, Hunting, Photography, Sightseeing, and Vehicle Exploring, together with access to Vista, and Campsite - Undeveloped. These recognized purposes and member-described uses demonstrate that the route is not redundant merely because another road may occur in the same general area. The route report maps the alignment in or near habitat for mule deer, desert bighorn sheep, and migratory birds. Habitat overlap alone does not establish measurable displacement or population-level harm, particularly on an existing low-speed route. BLM should use seasonal restrictions near verified sensitive sites, speed controls, no-stopping areas, and



monitoring before considering closure. Nothing in the route report establishes recurring sediment delivery, active gully, or an unmanageable soil failure. BLM should inspect after major storms, maintain drainage, harden isolated problem spots, and restrict use temporarily during saturated conditions rather than impose permanent closure. Although the route intersects VRM Class I terrain, it is an existing primitive linear feature. Visual effects should be evaluated through actual contrast, visibility, route width, and reclamation feasibility, not inferred from GIS overlap. Native-colored materials, limits on widening, and restoration of unauthorized pullouts can retain access while preserving scenic character. The route's location within or near a WSA or inventoried wilderness-character area does not establish impairment. Continued travel confined to a preexisting footprint, without new construction or mechanical expansion, is materially different from creation of a new road and avoids pressure for cross-country bypasses.

UPLA requests that Route 72D be designated or retained OHV-Open under Modified Alternative D. Where a localized concern is verified, BLM should first employ route-specific mitigation: clear signing; barriers or delineators to stop widening and braiding; drainage maintenance; restoration of unauthorized spurs; speed, parking, or camping controls; seasonal restrictions tied to objective conditions; cultural-resource monitoring; and cooperative stewardship with local clubs. Closure is not warranted where the identified concern is generalized, speculative, seasonal, or susceptible to maintenance and enforcement.

Route 73Q: Route 73 West-Side Loop

The BLM route report describes Route 73Q as a 2.44 miles Dual Track Wild Inv Road with low use. The report's designations are Alternative A: Open, Alternative B: Open, Alternative C: Open, Alternative D: Open.

UPLA members report that this connector creates a more varied loop along the west side of Route 73 and avoids reducing the entire experience to an out-and-back trip.

BLM's own route evaluation identifies recreation functions including Antler Shed Hunting, Camping, Equestrian, Hiking, Hunting, Photography, and Sightseeing, together with access to Campsite - Undeveloped. These recognized purposes and member-described uses demonstrate that the route is not redundant merely because another road may occur in the same general area. The route report maps the alignment in or near habitat for mule deer, desert bighorn sheep, and migratory birds. Habitat overlap alone does not establish measurable displacement or population-level harm, particularly on an existing low-speed route. BLM should use seasonal restrictions near verified sensitive sites, speed controls, no-stopping areas, and monitoring before considering closure. Hydrologic concerns should be addressed at the actual crossing or drainage



feature through rolling dips, hardened approaches, grade reversals, seasonal wet-weather controls, and prompt repair. A route designation change alone does not stabilize a channel or prevent sediment delivery. Although the route intersects VRM Class I terrain, it is an existing primitive linear feature. Visual effects should be evaluated through actual contrast, visibility, route width, and reclamation feasibility, not inferred from GIS overlap. Native-colored materials, limits on widening, and restoration of unauthorized pullouts can retain access while preserving scenic character. The route's location within or near a WSA or inventoried wilderness-character area does not establish impairment. Continued travel confined to a preexisting footprint, without new construction or mechanical expansion, is materially different from creation of a new road and avoids pressure for cross-country bypasses.

UPLA requests that Route 73Q be designated or retained OHV-Open under Modified Alternative D. Where a localized concern is verified, BLM should first employ route-specific mitigation: clear signing; barriers or delineators to stop widening and braiding; drainage maintenance; restoration of unauthorized spurs; speed, parking, or camping controls; seasonal restrictions tied to objective conditions; cultural-resource monitoring; and cooperative stewardship with local clubs. Closure is not warranted where the identified concern is generalized, speculative, seasonal, or susceptible to maintenance and enforcement.

Route 91: Bull Hollow / Zion Ponderosa Access

The BLM route report describes Route 91 as a 1.3 miles Dual Track Wild Inv Road with low use. The report's designations are Alternative A: Open, Alternative B: Open, Alternative C: Open, Alternative D: Open.

UPLA members report that members use this route repeatedly with family and friends to reach Bull Hollow from the Zion Ponderosa area, camp, watch sunsets, hunt, and patronize nearby businesses. A disabled-veteran member explains that the destination would not be accessible without motorized travel.

BLM's own route evaluation identifies recreation functions including Antler Shed Hunting, Hunting, Camping, and Vehicle Exploring, together with access to Campsite - Undeveloped, and Vista. These recognized purposes and member-described uses demonstrate that the route is not redundant merely because another road may occur in the same general area. The route report maps the alignment in or near habitat for mule deer, elk, and migratory birds. Habitat overlap alone does not establish measurable displacement or population-level harm, particularly on an existing low-speed route. BLM should use seasonal restrictions near verified sensitive sites, speed controls, no-stopping areas, and monitoring before considering closure. Hydrologic



concerns should be addressed at the actual crossing or drainage feature through rolling dips, hardened approaches, grade reversals, seasonal wet-weather controls, and prompt repair. A route designation change alone does not stabilize a channel or prevent sediment delivery. Although the route intersects VRM Class I terrain, it is an existing primitive linear feature. Visual effects should be evaluated through actual contrast, visibility, route width, and reclamation feasibility, not inferred from GIS overlap. Native-colored materials, limits on widening, and restoration of unauthorized pullouts can retain access while preserving scenic character.

UPLA requests that Route 91 be designated or retained OHV-Open under Modified Alternative D. Where a localized concern is verified, BLM should first employ route-specific mitigation: clear signing; barriers or delineators to stop widening and braiding; drainage maintenance; restoration of unauthorized spurs; speed, parking, or camping controls; seasonal restrictions tied to objective conditions; cultural-resource monitoring; and cooperative stewardship with local clubs. Closure is not warranted where the identified concern is generalized, speculative, seasonal, or susceptible to maintenance and enforcement.

Route 91NA: Bull Hollow Connector

The BLM route report describes Route 91NA as a 1.5 miles Dual Track Primitive Route with low use. The report's designations are Alternative A: Open, Alternative B: Closed, Alternative C: Open, Alternative D: Open. The report also identifies the route as follows: Portions of east end of route are reclaiming.

UPLA members report that this route connects the Route 91 system and supports access to dispersed camping and scenic locations near Zion Ponderosa. Member observations describe established use, responsible travel, and no visible resource damage.

BLM's own route evaluation identifies recreation functions including Antler Shed Hunting, Vehicle Exploring, and Hunting. These recognized purposes and member-described uses demonstrate that the route is not redundant merely because another road may occur in the same general area. The route report maps the alignment in or near habitat for mule deer, elk, and migratory birds. Habitat overlap alone does not establish measurable displacement or population-level harm, particularly on an existing low-speed route. BLM should use seasonal restrictions near verified sensitive sites, speed controls, no-stopping areas, and monitoring before considering closure. Nothing in the route report establishes recurring sediment delivery, active gullying, or an unmanageable soil failure. BLM should inspect after major storms, maintain drainage, harden isolated problem spots, and restrict use temporarily during saturated conditions rather than impose permanent closure. Although the route intersects VRM Class I terrain, it is an



existing primitive linear feature. Visual effects should be evaluated through actual contrast, visibility, route width, and reclamation feasibility, not inferred from GIS overlap. Native-colored materials, limits on widening, and restoration of unauthorized pullouts can retain access while preserving scenic character.

UPLA requests that Route 91NA be designated or retained OHV-Open under Modified Alternative D. Where a localized concern is verified, BLM should first employ route-specific mitigation: clear signing; barriers or delineators to stop widening and braiding; drainage maintenance; restoration of unauthorized spurs; speed, parking, or camping controls; seasonal restrictions tied to objective conditions; cultural-resource monitoring; and cooperative stewardship with local clubs. Closure is not warranted where the identified concern is generalized, speculative, seasonal, or susceptible to maintenance and enforcement.

Route 91DNA: Englestead Hollow / Orderville Viewpoint Spur

The BLM route report describes Route 91DNA as a 0.66 miles Dual Track Primitive Route with low use. The report's designations are Alternative A: Open, Alternative B: Closed, Alternative C: Open, Alternative D: Open. The report also identifies the route as follows: This segment split from 91D, due to location within the Natural Area.

UPLA members report that members use this route for sunset views over Zion National Park, Englestead Hollow, and the connection toward Orderville Canyon. It is particularly important to disabled and older visitors who cannot reach the viewpoint on foot.

BLM's own route evaluation identifies recreation functions including Antler Shed Hunting, Vehicle Exploring, Hunting, and Sightseeing, together with access to Vista. These recognized purposes and member-described uses demonstrate that the route is not redundant merely because another road may occur in the same general area. The route report maps the alignment in or near habitat for mule deer, elk, and migratory birds. Habitat overlap alone does not establish measurable displacement or population-level harm, particularly on an existing low-speed route. BLM should use seasonal restrictions near verified sensitive sites, speed controls, no-stopping areas, and monitoring before considering closure. Nothing in the route report establishes recurring sediment delivery, active gully, or an unmanageable soil failure. BLM should inspect after major storms, maintain drainage, harden isolated problem spots, and restrict use temporarily during saturated conditions rather than impose permanent closure. Although the route intersects VRM Class I terrain, it is an existing primitive linear feature. Visual effects should be evaluated through actual contrast, visibility, route width, and reclamation feasibility,



not inferred from GIS overlap. Native-colored materials, limits on widening, and restoration of unauthorized pullouts can retain access while preserving scenic character.

UPLA requests that Route 91DNA be designated or retained OHV-Open under Modified Alternative D. Where a localized concern is verified, BLM should first employ route-specific mitigation: clear signing; barriers or delineators to stop widening and braiding; drainage maintenance; restoration of unauthorized spurs; speed, parking, or camping controls; seasonal restrictions tied to objective conditions; cultural-resource monitoring; and cooperative stewardship with local clubs. Closure is not warranted where the identified concern is generalized, speculative, seasonal, or susceptible to maintenance and enforcement.

Route 92X: North Fork Hunter and Connector Route

The BLM route report describes Route 92X as a 2.62 miles Dual Track Wild Inv Road with low use. The report's designations are Alternative A: Open, Alternative B: Closed, Alternative C: Open, Alternative D: Open. The report also identifies the route as follows: County Class D. Route location at one point, does not match WSA boundary due to mapping errors.

UPLA members report that this route is important to hunters and functions as a connector in the North Fork network. The route report notes a mapping discrepancy where the route and WSA boundary do not align, which should be corrected rather than used to justify closure.

BLM's own route evaluation identifies recreation functions including Equestrian, Hiking, Hunting, Sightseeing, and Vehicle Exploring. These recognized purposes and member-described uses demonstrate that the route is not redundant merely because another road may occur in the same general area. The route report maps the alignment in or near habitat for mule deer, and elk. Habitat overlap alone does not establish measurable displacement or population-level harm, particularly on an existing low-speed route. BLM should use seasonal restrictions near verified sensitive sites, speed controls, no-stopping areas, and monitoring before considering closure. Hydrologic concerns should be addressed at the actual crossing or drainage feature through rolling dips, hardened approaches, grade reversals, seasonal wet-weather controls, and prompt repair. A route designation change alone does not stabilize a channel or prevent sediment delivery. Although the route intersects VRM Class I terrain, it is an existing primitive linear feature. Visual effects should be evaluated through actual contrast, visibility, route width, and reclamation feasibility, not inferred from GIS overlap. Native-colored materials, limits on widening, and restoration of unauthorized pullouts can retain access while preserving scenic character. The route's location within or near a WSA or inventoried wilderness-character area does not establish impairment. Continued travel confined to a preexisting footprint, without new



construction or mechanical expansion, is materially different from creation of a new road and avoids pressure for cross-country bypasses.

UPLA requests that Route 92X be designated or retained OHV-Open under Modified Alternative D. Where a localized concern is verified, BLM should first employ route-specific mitigation: clear signing; barriers or delineators to stop widening and braiding; drainage maintenance; restoration of unauthorized spurs; speed, parking, or camping controls; seasonal restrictions tied to objective conditions; cultural-resource monitoring; and cooperative stewardship with local clubs. Closure is not warranted where the identified concern is generalized, speculative, seasonal, or susceptible to maintenance and enforcement.

Route 93: Zion Narrows / Private-Property Access

The BLM route report describes Route 93 as a 2.11 miles Graded Track Wild Inv Road with high use. The report's designations are Alternative A: Open, Alternative B: Open, Alternative C: Open, Alternative D: Open.

UPLA members report that this high-use route provides access associated with private property and the iconic Zion Narrows trailhead area. BLM should retain it open and resolve any discrepancy between route reports, maps, and interactive planning materials.

BLM's own route evaluation identifies recreation functions including Bicycling / Mountain Biking, Canyoneering, Christmas Tree Cutting -, Camping, Equestrian, Hiking, and Hunting, together with access to Campsite - Undeveloped, Parking Area - Developed, and Trailhead. These recognized purposes and member-described uses demonstrate that the route is not redundant merely because another road may occur in the same general area. The route report maps the alignment in or near habitat for mule deer, and elk. Habitat overlap alone does not establish measurable displacement or population-level harm, particularly on an existing low-speed route. BLM should use seasonal restrictions near verified sensitive sites, speed controls, no-stopping areas, and monitoring before considering closure. Hydrologic concerns should be addressed at the actual crossing or drainage feature through rolling dips, hardened approaches, grade reversals, seasonal wet-weather controls, and prompt repair. A route designation change alone does not stabilize a channel or prevent sediment delivery. Although the route intersects VRM Class I terrain, it is an existing primitive linear feature. Visual effects should be evaluated through actual contrast, visibility, route width, and reclamation feasibility, not inferred from GIS overlap. Native-colored materials, limits on widening, and restoration of unauthorized pullouts can retain access while preserving scenic character. The route's location within or near a WSA or inventoried wilderness-character area does not establish impairment. Continued travel confined



to a preexisting footprint, without new construction or mechanical expansion, is materially different from creation of a new road and avoids pressure for cross-country bypasses.

UPLA requests that Route 93 be designated or retained OHV-Open under Modified Alternative D. Where a localized concern is verified, BLM should first employ route-specific mitigation: clear signing; barriers or delineators to stop widening and braiding; drainage maintenance; restoration of unauthorized spurs; speed, parking, or camping controls; seasonal restrictions tied to objective conditions; cultural-resource monitoring; and cooperative stewardship with local clubs. Closure is not warranted where the identified concern is generalized, speculative, seasonal, or susceptible to maintenance and enforcement.

Route HC7: Hog Canyon Route Identifier Submitted by a Member

UPLA members report that a TrailSaver respondent identified 'BLM HC7 Hog Canyon' as a favorite route used for OHV travel, hunting, camping, scenic family outings, club events, and stewardship. The identifier does not correspond to a route report in the Trail Canyon Route Reports volume. BLM should cross-reference the local name and GIS feature before finalizing the TMP rather than disregard the member's location-specific feedback.

Because the submitted local identifier could not be matched to a route report in the compiled Trail Canyon volume, BLM should identify the correct route number and GIS feature, determine whether it lies within the Trail Canyon TMA, and respond to the substantive member feedback. If it is within the planning area, UPLA requests an open designation with management, signing, maintenance, and enforcement in lieu of closure. If it lies outside the TMA, the comment should be carried forward to the correct planning file.

Consolidated Route-Specific Request

We urge the BLM to retain or designate the routes addressed above as OHV-Open within Modified Alternative D. The route reports repeatedly recognize public purpose and need, recreation and property-access functions, and the availability of mitigation. The member record adds concrete evidence concerning route condition, historic use, loop connectivity, public safety, scenic destinations, hunting and camping access, local economic activity, and accessibility for seniors, veterans, and persons with disabilities. BLM should correct mapping and identifier discrepancies, repair rather than close eroded segments, protect sensitive sites through targeted measures, and reserve permanent closure for demonstrated impacts that cannot be resolved through active management.



DEFICIENCIES WITHIN THE ENVIRONMENTAL ASSESSMENT

UPLA recognizes the substantial administrative effort reflected in the Trail Canyon Travel Management Plan Draft Environmental Assessment. The Bureau compiled an extensive route inventory, prepared hundreds of route reports, coordinated with cooperating agencies, completed consultation under the Endangered Species Act and National Historic Preservation Act, and evaluated a broad range of natural, cultural, recreational, and administrative resources. These efforts provide a substantial foundation for a lawful final decision.

Nevertheless, the Draft EA contains material analytical, evidentiary, and implementation deficiencies that should be corrected before BLM issues a Finding of No Significant Impact or final travel-management decision. These deficiencies do not necessarily require abandonment of the planning process or preparation of an Environmental Impact Statement. They do, however, require supplementation, clarification, and modification of the proposed route network to ensure that the final decision reflects reasoned decisionmaking, an accurate comparison of alternatives, and compliance with FLPMA, NEPA, the governing Resource Management Plan, and applicable travel-management requirements.

Disproportionate Reliance on Route Mileage and Geographic Overlap

The Draft EA repeatedly uses route mileage within or near mapped resources as the principal indicator of environmental effect. The analysis compares route mileage within wildlife habitat, modeled plant habitat, Wilderness Study Areas, Lands with Wilderness Characteristics, BLM Natural Areas, Visual Resource Inventory and Management classes, riparian areas, Wild and Scenic River corridors, and other mapped resource categories.

These comparisons are useful as screening tools, but they do not establish causation, intensity, significance, or the necessity of closure. A route's presence within broad wildlife habitat does not demonstrate measurable displacement, reduced reproduction, mortality, or population-level effects. A route located within 300 feet of modeled plant habitat does not demonstrate that listed plants are present or being affected. A route intersecting a cultural-resource polygon does not necessarily alter the characteristics making a historic property eligible for the National Register. A primitive route within a WSA or LWC unit does not necessarily impair wilderness suitability, apparent naturalness, or opportunities for solitude.

The Draft EA should distinguish among:

1. geographic overlap;
2. potential exposure;
3. documented route-related effects;



4. effects that can be mitigated;
5. effects that are sufficiently serious and unmitigable to warrant permanent closure.

Without this distinction, the analysis risks treating the number of route miles closed as a proxy for environmental quality. NEPA requires a rational connection between the evidence and the agency's decision, not merely a numerical comparison showing that fewer open routes produce fewer theoretical opportunities for interaction with mapped resources. See *Motor Vehicle Manufacturers Association v. State Farm Mutual Automobile Insurance Co.*, 463 U.S. 29, 43 (1983).

Insufficient Route-Specific Explanation for Closures

The route reports contain substantial information concerning route condition, public use, connectivity, recreation destinations, administrative functions, State Trust Land access, grazing facilities, cultural resources, wildlife habitat, soils, hydrology, and potential management actions. Many reports expressly conclude that:

- the route has an identified purpose and need;
- the route contributes to recreation, connectivity, public safety, or other multiple-use functions;
- anticipated effects can be avoided, minimized to acceptable levels, or mitigated;
- the route's purposes cannot be adequately met by another route;
- continued use on an established alignment can reduce pressure for cross-country travel;
- relocation may create greater impacts than management of the existing route.

For example, the route-report rationale repeatedly recognizes that established routes can concentrate travel, discourage off-route disturbance, preserve access to recreation destinations and State lands, and accommodate traffic without greater than minimal adverse effects. The reports also identify management tools such as regulatory signs, barriers, stream-crossing hardening, parking relocation, monitoring, and restoration of unauthorized disturbances.

Where BLM nevertheless proposes closure, the Final EA and decision record should explain why these affirmative findings do not support an open-with-management designation. Generalized rationales such as reducing route footprint, enhancing habitat movement, reducing route density, improving wilderness character, or removing potential effects are insufficient where the record simultaneously establishes that the route serves an important purpose and that effects can be mitigated.

The decision should provide a route-specific explanation identifying:

- the exact resource affected;
- the route-related mechanism of impact;
- observed or reasonably foreseeable severity;



- relevant monitoring or field evidence;
- mitigation considered;
- why mitigation would be inadequate;
- network and access consequences of closure;
- the expected measurable benefit of closure.

Inadequate Comparative Treatment of Adverse Closure Effects

The Draft EA provides extensive discussion of the potential environmental benefits associated with closing routes but comparatively limited analysis of the corresponding adverse effects upon recreation, access, connectivity, public safety, visitor dispersion, local economic activity, and accessibility.

Closure is itself an agency action with environmental and social consequences. It can:

- eliminate loop opportunities;
- create dead ends and repeated out-and-back travel;
- increase total vehicle miles traveled;
- concentrate use upon fewer routes;
- increase congestion, dust, erosion, and user conflict on retained routes;
- force low-speed OHVs onto or near higher-speed roads;
- reduce access to dispersed campsites, trailheads, hunting areas, overlooks, and cultural destinations;
- impair emergency egress and search-and-rescue access;
- displace use into adjacent management areas;
- encourage unauthorized bypasses;
- exclude elderly and mobility-impaired visitors.

The Draft EA recognizes that Alternative D's larger network will reduce congestion by dispersing use, but that finding is not consistently carried into the analyses of soils, wildlife, cultural resources, water, or user conflict. The inverse consequence of closing routes under Alternatives B and C should be disclosed and compared with equal analytical rigor.

Unsupported Assumption That Visitation and Economic Effects Are Identical Across Alternatives

The Draft EA estimates that recreation within the TMA supports substantial employment, labor income, value added, and total economic output. It nevertheless assumes that visitation will remain constant under all alternatives and consequently reports identical economic effects regardless of whether 23, 41, or 141 miles are closed. That assumption predetermines the result and prevents meaningful socioeconomic comparison. **A plan that eliminates nearly one-third**



of the evaluated network cannot reasonably be presumed to produce precisely the same visitor demand, trip duration, repeat visitation, destination choice, and local spending as an alternative preserving 95% of the network without supporting evidence.

The Final EA should include a sensitivity analysis addressing one-, five-, and ten-percent changes in visitation within ranges of increments that align with the number of route miles that are proposed for closure in each Alternative. It should also consider changes in:

- average trip length;
- overnight stays;
- event and group use;
- fuel, lodging, food, repair, and equipment expenditures;
- visitor substitution to destinations outside Kane County;
- economic effects upon businesses disproportionately serving motorized visitors.

The analysis should further recognize that route networks possess collective economic value through destination access, loops, trip variety, connectivity, and support for multi-day itineraries. A short connector may have substantial economic significance when its closure eliminates a much larger loop or discourages an entire class of visitation.

Insufficient Analysis of Accessibility and Disparate Effects

The Draft EA does not adequately evaluate how route closures would affect persons who depend upon motorized access because of disability, age, illness, injury, family circumstances, or limited physical endurance. This omission is especially significant where the record documents routes leading to scenic overlooks, hunting areas, cultural destinations, trailheads, dispersed campsites, and other locations that are not reasonably accessible on foot for many visitors.

The Americans with Disabilities Act does not require every primitive destination to be made accessible, and UPLA does not contend otherwise. However, Section 504 of the Rehabilitation Act prohibits exclusion from federally conducted programs solely by reason of disability and requires federal agencies to consider reasonable access within the context of program design (29 U.S.C. § 794; 43 C.F.R. Part 17). **The relevant program is not simply pedestrian entry onto the TMA. It is the opportunity to experience the recreation destinations, public lands, scenic resources, and activities made available through the travel network on BLM-managed public land. A statement that nonmotorized travel remains allowed does not adequately evaluate whether elderly or disabled visitors can meaningfully substitute hiking for motorized access.**

The Final EA should identify routes providing the only or most practical access for mobility-limited visitors and explain how closure affects their participation. Where a route supplies such



access and resource effects can be mitigated, equitable public-land management weighs strongly in favor of retention.

Incomplete Public-Safety Analysis

Public safety was addressed only briefly rather than analyzed as a principal issue. This treatment is inadequate where route designations may force users toward highways, eliminate alternate exits, increase travel distance, or reduce emergency-access options.

Route 61A presents a particularly important example. UPLA member feedback identifies the route as a connector between the Peekaboo staging area and the western route network that allows OHV users to avoid travel on or immediately alongside U.S. Highway 89. Closing a low-speed connector while directing recreational traffic toward a high-speed highway presents a foreseeable safety consequence requiring explicit analysis.

BLM should also examine:

- evacuation routes during wildfire and flash flooding;
- alternate exits following mechanical failure or route obstruction;
- search-and-rescue response time;
- law-enforcement and emergency-medical access;
- recovery of stranded vehicles;
- emergency communication limitations;
- whether closure converts loops into long out-and-back routes.

The Draft EA's generalized conclusion that public-safety effects do not warrant detailed analysis should be reconsidered where route-specific evidence identifies concrete hazards.

Failure to Fully Integrate the Class II Survey Determination

The BLM's June 29, 2026 Section 106 consultation letter to Mike Reid is directly relevant to cultural-resource closure rationales. BLM reported that approximately 82.8% of the Area of Potential Effects had been surveyed, that all routes analyzed during route evaluation were included within surveyed acreage, and that the agency did not believe limited Class II surveys were warranted. BLM further concluded that current use patterns already concentrate travel on the best available routes and that minor traffic-pattern changes generally were not expected to create substantial cultural-resource effects.

These findings should be incorporated into the Final EA's alternatives and route-specific analyses. They weigh against closure based upon generalized uncertainty that additional cultural



resources may exist near routes. They also support the use of targeted monitoring and Historic Properties Treatment Plan measures where potential adverse effects have been identified.

The Final EA should reconcile any closure rationale based upon insufficient cultural data with the agency's separate conclusion that additional Class II sampling is unnecessary. If BLM believes the inventory is sufficient for Section 106 purposes, it cannot reasonably nor legally justify characterizing generalized survey uncertainty as evidence favoring route closure. If the BLM believes the inventory is insufficient for a particular route, it must complete the necessary identification work before making an irreversible decision.

Inadequate Definition of Purpose and Need at the Route Level

The 2017 Settlement Agreement states that a route without an identified purpose and need will not be proposed as part of the designated network. The Draft EA properly treats purpose and need as an important route-evaluation criterion. However, some closure rationales appear to apply an unduly narrow definition of legitimate purpose, as though a route must reach a formally developed facility or unique endpoint.

A route may have a legitimate purpose because it:

- completes a loop;
- provides alternate access or emergency egress;
- disperses use;
- offers a distinct scenic or technical experience;
- reaches dispersed camping or hunting terrain;
- connects jurisdictional route systems;
- provides access to State Trust Land or private property;
- supports firewood collection, range management, or wildlife monitoring;
- reduces highway exposure;
- facilitates sightseeing, photography, or wildlife viewing;
- serves longstanding family, community, or cultural use.

NEPA and FLPMA do not require every route to terminate at a developed recreation site. Vehicle exploration is itself a recognized recreation activity, and network connectivity is a legitimate transportation purpose. The Final EA must expressly recognize these functions.

Inadequate Consideration of Limited Designations and Less Restrictive Alternatives

Alternative D contains no OHV-Limited routes, while Alternatives B and C use limited designations almost exclusively for e-bikes. This narrow treatment fails to meaningfully evaluate the full range of available management options.



BLM may limit routes by:

- season;
- vehicle type or width;
- direction of travel;
- speed;
- wet-weather conditions;
- time of day;
- parking or stopping;
- camping or staging;
- permit or event conditions.

Where the concern is seasonal wildlife sensitivity, saturated soils, excessive speed, roadside camping, parking near cultural resources, or route widening, a tailored limitation may directly address the concern while preserving the route's principal function. Permanent closure should not be selected where a narrower restriction would achieve the same resource objective.

Uncertain, Deferred, and Unfunded Implementation

The Draft EA relies substantially upon future signing, maintenance, enforcement, monitoring, and reclamation. Yet the Implementation Guide repeatedly qualifies these actions according to available staffing and funding. Monitoring is described as ad hoc and strategic, using staff, volunteers, users, and partners “as time and funding permit.”

This qualification creates a significant analytical problem. **If mitigation and monitoring are necessary to support a FONSI, they cannot remain discretionary, indefinite, or dependent upon unidentified future resources. Conversely, if BLM lacks the resources to implement route management, closure should not become a substitute for adequate staffing, because closed-route enforcement and reclamation also require substantial funding.**

The Final EA and decision should identify:

- mandatory mitigation commitments;
- implementation priorities;
- responsible personnel;
- target completion dates;
- estimated costs;
- anticipated funding sources;
- human, equipment, financial, resource, skill, and knowledge gaps that can be addressed through volunteer agreements with members of the public;



- performance standards;
- reporting requirements;
- corrective actions when implementation is delayed.

Lack of Route-Specific Reclamation Planning

The Draft EA expressly states that the TMP does not identify route-specific reclamation strategies and that those strategies will be developed later, potentially through additional site-specific NEPA review. An OHV-Closed designation also does not necessarily mean that active reclamation will occur because a route may remain available for authorized use. This materially limits the claimed environmental benefit of closure. If a route remains physically present, continues to convey administrative traffic, or is not actively recontoured, it may continue to affect drainage, visual character, habitat configuration, weed dispersal, and cultural-resource access. A designation change does not itself restore soil, vegetation, hydrology, or apparent naturalness.

Before claiming that a closure will produce resource benefits, BLM must disclose:

- whether the route will remain available for authorized use;
- whether active reclamation is proposed;
- the reclamation technique;
- potential short-term disturbance;
- expected recovery time;
- maintenance and monitoring requirements;
- probability of success;
- cost and funding;
- whether reclamation could affect R.S. 2477 claims or county-classified roads.

Mapping and Route-Identifier Discrepancies

The public record identifies potential discrepancies involving Route 61A, Route 93, Route 92X, local trail names, WSA boundaries, interactive maps, and the compiled route-report volume. These inconsistencies impede meaningful public participation and risk producing a final decision based upon mismatched route identifiers. The Bureau should publish a final crosswalk containing:

- BLM route number;
- local or common name;
- GIS feature identifier;
- route length;
- jurisdiction;
- current designation;



- designation under each alternative;
- final designation;
- applicable management prescriptions.

Any route whose identity, alignment, or designation remains uncertain should not be closed until the inconsistency is corrected and the public has a reasonable opportunity to understand the proposed action.

Failure to Apply Current Federal Policy Consistently

The Draft EA continues to describe the planning process through regulatory language historically associated with Executive Orders 11644 and 11989. Although 43 C.F.R. Part 8340 remains in effect unless amended through rulemaking, the May 29, 2026 rescission of those Executive Orders is relevant to the policy context in which the final decision will be made.

BLM should not treat abstract route-density reduction or maximum elimination of potential effects as an independent management objective. Resource protection must instead be grounded in FLPMA, the governing RMP, valid regulations, and route-specific evidence. The final decision should explain how the Bureau has considered the rescission and should avoid relying upon closure-oriented policy presumptions derived solely from the rescinded directives.

Need for Supplementation Before a FONSI

The Department of the Interior's February 2026 NEPA procedures continue to require analysis of reasonably foreseeable effects, alternatives, significance, and the factual basis for a FONSI. DOI's current procedures also recognize that ecological, aesthetic, historic, cultural, economic, social, local-custom, and health effects may inform the environmental review.

Before issuing a FONSI, BLM should correct the foregoing deficiencies and demonstrate that:

- the selected route designations are supported by route-specific evidence;
- mitigation relied upon is enforceable and adequately funded;
- closure effects have been assessed alongside closure benefits;
- accessibility, safety, and socioeconomic effects have been meaningfully considered;
- the selected alternative will not produce significant effects through use concentration, network fragmentation, displaced travel, or implementation failure.

RECOMMENDED MODIFICATIONS TO ALTERNATIVE D

UPLA continues to support Alternative D as the most appropriate foundation for the final Trail Canyon TMP. Alternative D preserves 446 miles (equivalent to 95%, of the evaluated route



network), retains the greatest number of routes providing access to recreation destinations among the action alternatives, and most closely reflects FLPMA's multiple-use direction. The Bureau describes Alternative D as prioritizing OHV access while addressing adverse resource effects.

Alternative D nevertheless should be modified before selection. A Modified Alternative D should preserve all routes that are proposed for designation as "Open" under Alternative D, incorporate additional open routes identified through public comment and Alternative A, substitute narrowly tailored limitations where appropriate, and attach enforceable management prescriptions to routes presenting localized concerns.

Retain All Alternative D Open Routes

At a minimum, the final decision should retain all 446 miles identified as OHV-Open under Alternative D. The record does not establish a basis for selecting a more restrictive network, and the Draft EA demonstrates that Alternative D can maintain broad recreation access while operating within the biological and cultural consultation framework. The route reports repeatedly recognize that open-with-management designations can reduce impacts by concentrating use on existing alignments, avoiding new disturbance, maintaining access to State lands and recreation destinations, and applying route-specific prescriptions.

Add Priority Routes Proposed for Closure

Modified Alternative D should add or retain the routes addressed in UPLA's route-specific comments, including the priority routes identified by members and local recreation organizations. These routes should remain open where they provide:

- essential loop connectivity;
- public-safety separation from highways;
- access to scenic overlooks;
- connections to State Trust Lands or private lands;
- cultural and historical interpretation;
- dispersed camping and hunting access;
- iconic or longstanding recreation experiences;
- practical access for disabled and elderly visitors;
- alternate emergency egress;
- visitor dispersion within heavily used recreation areas.

Priority consideration should be given to Routes 20WSA, 61A, 40Q, 28WSA, 51, 52, 70WSA, 93, 19A, the 32-series Coral Pink west-loop routes, 18WSA, 20M, 28L, 73Q, and other routes identified in our route-specific analysis in this comment letter, as well as UPLA member route feedback as noted in Appendix A that we've submitted with this letter.



Treat Connectivity as a Primary Purpose

The final decision should expressly recognize route connectivity as an affirmative purpose and need. A short connector should not be evaluated solely according to its individual mileage or endpoint. Its value includes the larger network made functional through its retention. Before closing any connector, BLM must calculate:

- loop mileage lost;
- additional out-and-back mileage created;
- alternative travel distance;
- highway exposure;
- effect upon emergency egress;
- use concentrated on remaining routes;
- destinations made practically inaccessible.

Preserve Established WSA Primitive Routes

Existing primitive routes within WSAs should remain available where continued travel is confined to the historical footprint and does not violate the nonimpairment standard. The route reports recognize that BLM Manual 6330 permits continued motorized and mechanized use along certain existing routes identified during the Section 603 and Section 202 inventory processes, while distinguishing such continuation from classification of the route as a transportation asset.

The final maps and decision should use legally accurate terminology and should not convert existing primitive use into closure merely because the route is not classified as a BLM asset.

Eliminate De Facto Wilderness Buffers

Routes outside statutory wilderness and WSAs should not be closed merely to improve perceived solitude, reduce sound or visibility, lower route density, or protect wilderness characteristics beyond the legal boundary.

For LWC units and BLM Natural Areas, the decision must identify the governing RMP prescription and demonstrate route-specific inconsistency with that prescription. **Inventory status alone does not authorize wilderness management.**

Substitute Open-With-Management or Limited Designations

Where legitimate concerns exist, BLM should apply the least restrictive designation capable of resolving the problem. Modified Alternative D should include open-with-management or limited designations using:



- seasonal wildlife protections;
- temporary wet-weather restrictions;
- width limitations;
- speed limits;
- one-way travel;
- restrictions on roadside camping;
- no-stopping areas near cultural or biological resources;
- designated parking and staging;
- event-specific permit conditions.

Limitations should be defined by objective criteria and should not depend upon vague future discretion.

Incorporate the Class II Survey Findings

Cultural-resource closures should be reevaluated in light of BLM's June 29, 2026 conclusion that all evaluated routes were included within surveyed acreage, the substantial majority of the APE had been surveyed, and additional limited Class II surveys were not warranted.

Routes should remain open where potential effects can be addressed through the Historic Properties Treatment Plan, route delineation, parking controls, monitoring, interpretation, or enforcement. Closure should be limited to documented circumstances in which continued travel would adversely affect the integrity of a historic property and no lesser measure would suffice.

Retain Routes Through Broad or Modeled Habitat

Routes should not be closed solely because they occur within:

- general wildlife habitat;
- experimental-population boundaries;
- modeled plant habitat;
- critical-habitat polygons;
- migratory-bird habitat;
- broad seasonal-range mapping.

BLM should identify occupied habitat, sensitive periods, exposure pathways, and documented responses. Seasonal restrictions, surveys, speed controls, and monitoring should be used where warranted.

The 2022 Biological Opinion concluded that the action was not likely to jeopardize Mexican spotted owl, Jones cycladenia, Welsh's milkweed, or Siler pincushion cactus and was not likely to adversely modify designated critical habitat for Mexican spotted owl or Welsh's milkweed.



That consultation outcome supports a targeted management approach rather than generalized closure.

Retain Routes with Correctable Soil or Hydrologic Problems

Routes should remain open where erosion, drainage, or crossing concerns can be addressed through:

- rolling dips;
- grade reversals;
- hardened crossings;
- outsloping;
- aggregate or native-material surfacing;
- stabilization of short grades;
- barriers against braiding;
- post-storm inspection;
- temporary saturated-soil restrictions.

The route reports already identify route-specific actions such as hardening stream crossings and repairing WSA-boundary barricades.

Preserve Access to State Trust Lands and Private Lands

Public access to Utah Trust Lands Administration parcels and private lands should be retained wherever legally and physically practicable. Case-specific authorization for permittees is not an equivalent substitute for public access.

The decision should also state that no route designation:

- adjudicates an R.S. 2477 claim;
- prejudices Kane County or the State of Utah;
- extinguishes a valid existing right;
- constitutes evidence against a claimed right-of-way.

Protect Public Safety

Route 61A and any comparable connector should be retained where closure would force OHVs onto or along a high-speed highway. Routes providing alternate evacuation paths, emergency access, and recovery options should receive a presumption of retention.

Create a Two-Way Adaptive-Management Process

Modified Alternative D should permit both restrictions and restoration of access. Monitoring cannot operate solely as a mechanism for future closure. The decision should authorize reopening or relaxation of restrictions where:

- mitigation succeeds;



- resource conditions improve;
- monitoring disproves prior assumptions;
- route repairs are completed;
- changed circumstances restore compatibility.

MONITORING AND ADAPTIVE MANAGEMENT FRAMEWORK

Adaptive management is particularly appropriate for the Trail Canyon TMP because the planning area contains dynamic ecological systems, variable visitor-use patterns, changing route conditions, and unavoidable uncertainty regarding the effects of individual routes. The Draft EA defines adaptive management as a system based upon clearly identified outcomes and monitoring, followed by management changes where outcomes are not achieved. UPLA supports this framework, provided that it is objective, transparent, adequately funded, and genuinely adaptive in both directions.

Establish Baseline Conditions Before Implementation

Before implementing route closures, limitations, reclamation, or significant management changes, BLM should establish a reproducible baseline for each priority route and sensitive resource location. Baseline documentation should include:

- georeferenced photographs;
- route width;
- tread condition;
- rut depth;
- drainage condition;
- evidence of braiding or proliferation;
- traffic volume and vehicle type;
- campsites and parking areas;
- vegetation condition;
- weed presence;
- cultural-resource condition;
- stream-crossing stability;
- wildlife use where relevant;
- noise or visual conditions where those issues are cited.

Without baseline information, BLM cannot reliably determine whether conditions are improving, declining, or unchanged.

Develop Measurable Indicators

Monitoring should use indicators directly connected to the resource concern. Examples include:



Soils and hydrology

- rut depth and length;
- number and size of erosion features;
- sediment reaching a channel;
- crossing stability;
- drainage-structure performance;
- route width;
- development of parallel tracks.

Vegetation and special-status plants

- verified presence and condition of occupied populations;
- encroachment beyond the route tread;
- dust deposition where measurable;
- invasive-species occurrence;
- vegetation recovery at restored disturbances.

Wildlife

- use of known nesting, roosting, lambing, fawning, or winter-concentration areas;
- documented mortality;
- repeated displacement;
- traffic volume during sensitive periods;
- compliance with seasonal or no-stopping restrictions.

Cultural resources

- new vehicle intrusion into site boundaries;
- artifact displacement;
- vandalism or collection incidents;
- camping, parking, or fire-ring encroachment;
- erosion affecting site integrity.

Recreation and access

- visitor counts;
- congestion;
- user conflicts;
- destination access;
- event participation;
- public-safety incidents;
- highway exposure;



- unauthorized bypass creation;
- accessibility effects.

Wilderness characteristics and visual resources

- expansion beyond the existing footprint;
- new mechanical improvement;
- visibility from identified key observation points;
- encounter rates;
- actual use intensity;
- success of revegetation and restoration.

Adopt Objective Thresholds

The final decision should state thresholds that trigger management review. A threshold should identify:

- the indicator being measured;
- acceptable condition;
- amount or duration of deviation;
- required verification;
- management response;
- timeframe for corrective action.

For example, a temporary wet-weather restriction might be triggered by documented soil saturation and recurring rutting beyond an established depth, not merely by a general forecast of precipitation. A wildlife limitation might be triggered by verified occupancy of a nesting area within a defined distance during a defined season, not the route's location within broad modeled habitat.

Use a Graduated Management Response

Adaptive management should proceed through graduated responses:

1. Education and voluntary compliance.
2. Improved signing and route delineation.
3. Maintenance or engineering correction.
4. Targeted parking, camping, speed, or stopping controls.
5. Seasonal or temporary limitation.
6. Short relocation within disturbed ground where feasible.
7. Temporary closure during repair or acute risk.
8. Permanent closure only after lesser measures fail or are demonstrably infeasible.



The route reports already contemplate this type of management. They frequently state that monitoring data showing declining resource integrity or unsuccessful mitigation would trigger adaptive responses. The final decision should formalize that sequence rather than allowing immediate escalation to permanent closure.

Require Causal Analysis

Monitoring must distinguish route-related effects from external causes such as:

- wildfire;
- drought;
- extreme precipitation;
- natural channel migration;
- livestock use;
- unauthorized cross-country travel;
- invasive species;
- adjacent development;
- highway traffic;
- recreation occurring outside designated routes.

A decline near a route does not necessarily establish that lawful route use caused the decline. Management responses should address the actual causal mechanism.

Incorporate Volunteer and Partner Monitoring

UPLA and affiliated clubs are willing to participate in monitoring, maintenance, cleanup, signage, and stewardship. The Implementation Guide already contemplates use of volunteers, users, and partners. BLM should establish written stewardship agreements that identify:

- approved monitoring protocols;
- training requirements;
- reporting formats;
- safety procedures;
- points of contact;
- data-quality standards;
- maintenance activities volunteers may perform;
- agency response timelines.

Volunteer involvement should supplement, not replace, BLM's legal and administrative responsibilities.

Conduct Scheduled Strategic Monitoring

Monitoring should not depend exclusively upon ad hoc reports. BLM should inspect priority routes:



- before implementation;
- during the first year after the decision;
- after major storm or wildfire events;
- during relevant wildlife or plant seasons;
- at least annually for the first three years;
- at appropriate intervals thereafter based upon condition.

Routes with known concerns or intensive use should receive more frequent review.

Publish Annual Monitoring Reports

BLM should publish a concise annual report containing:

- routes inspected;
- indicators measured;
- conditions observed;
- maintenance completed;
- restrictions imposed or removed;
- cultural-resource incidents;
- unauthorized-route trends;
- expenditures;
- volunteer contributions;
- proposed next actions.

Public reporting will improve accountability, allow local users to correct misinformation, and build support for necessary conservation measures.

Provide a Formal Reopening Procedure

The decision should establish a process through which the public, Kane County, the State of Utah, or a partner organization may request reconsideration of a closed or limited route based upon:

- successful mitigation;
- changed conditions;
- corrected mapping;
- new scientific information;
- demonstrated public-safety needs;
- restored route condition;
- newly documented recreation or access values.

BLM should respond within a defined period and explain whether supplemental review is required.



Avoid Automatic Ratcheting Toward Closure

Adaptive management loses legitimacy if every monitoring result can produce additional restriction but no result can restore access. The framework must be symmetrical. Conditions that improve should permit relaxation of restrictions just as deterioration may warrant additional controls.

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 Kane County and the State of Utah

Implementation should include formal coordination with:

- Kane 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 REQUESTED ACTIONS

UPLA recommends that the Bureau of Land Management:

1. **Select a Modified Alternative D** as the final Trail Canyon travel network.
2. **Retain all approximately 446 miles proposed OHV-Open under Alternative D.**
3. **Open or retain the priority routes identified in UPLA's route-specific comments,** including routes essential to loop connectivity, safety, scenic access, hunting, camping, cultural interpretation, State Trust Land access, and accessibility.



4. **Recognize connectivity, loops, visitor dispersion, alternate exits, and vehicle exploration as legitimate route purposes and needs.**
5. **Correct route-identifier, mapping, alignment, WSA-boundary, and designation discrepancies before issuing the final decision.**
6. **Publish a comprehensive route crosswalk** showing BLM identifiers, common names, jurisdiction, mileage, alternative designations, final designations, and management prescriptions.
7. **Retain Route 61A or its correctly identified GIS equivalent** to preserve a safe connection between the Peekaboo staging area and the western route network and avoid forcing OHVs onto or alongside U.S. Highway 89.
8. **Retain Routes 20WSA, 40Q, 28WSA, 51, 52, 70WSA, 93, 19A, the Coral Pink west-loop routes, 18WSA, 20M, 28L, 73Q, and other member-identified priority routes.**
9. **Reevaluate every Alternative D closure** against the route report's findings concerning purpose and need, connectivity, resource condition, mitigation, and substitute access.
10. **Do not close routes solely because they occur within generalized wildlife habitat, modeled plant habitat, LWC inventory units, broad cultural-resource buffers, VRI classes, ephemeral-drainage mapping, or proximity to WSAs.**
11. **Require route-specific evidence of material and unmitigable harm before permanent closure.**
12. **Distinguish geographic overlap from documented environmental effect.**
13. **Integrate the 2022 Biological Opinion's no-jeopardy and no-adverse-modification conclusions into the final alternatives and route analyses.**
14. **Integrate the June 29, 2026 Class II survey letter**, including BLM's conclusions regarding survey coverage, evaluated routes, traffic concentration, and the lack of need for additional limited Class II surveys.
15. **Do not create de facto wilderness buffers** outside congressionally designated wilderness or WSAs.
16. **Retain existing WSA primitive-route use** where continued travel remains confined to the historical footprint and complies with the nonimpairment standard.
17. **Apply the governing RMP prescriptions to BLM Natural Areas and LWC units** rather than imposing statutory wilderness standards through implementation-level planning.
18. **Preserve public access to State Trust Lands, private lands, recreation destinations, trailheads, and authorized-use facilities.**
19. **Include express savings language protecting R.S. 2477 claims and valid existing rights.**
20. **Evaluate accessibility effects upon persons with disabilities, seniors, veterans, families with young children, and visitors with limited mobility.**



21. **Treat motorized access as part of the federal recreation program**, not merely as a convenience that can be replaced by pedestrian access.
22. **Expand the public-safety analysis** to address highways, evacuation, alternate exits, search and rescue, emergency response, flash flooding, wildfire, and vehicle recovery.
23. **Replace the assumption of identical visitation across alternatives with a socioeconomic sensitivity analysis.**
24. **Evaluate effects upon local businesses, trip duration, overnight stays, repeat visitation, visitor substitution, and recreation-related employment.**
25. **Analyze the cumulative effects of route-network fragmentation**, including increased out-and-back mileage, congestion, use concentration, and unauthorized bypasses.
26. **Use open-with-management and limited designations before closure.**
27. **Apply seasonal restrictions only where the concern is seasonal**, using objective opening and closing criteria.
28. **Use wet-weather restrictions rather than permanent closure where saturated soils create the principal concern.**
29. **Use vehicle-width, speed, direction, parking, camping, stopping, or staging limitations where those restrictions address the actual problem.**
30. **Repair erosion, drainage, stream crossings, and route braiding before considering closure.**
31. **Implement identified maintenance actions**, including Route 51 repairs, Route 20WSA braiding controls, stream-crossing hardening, barricade repair, fencing maintenance, and campsite formalization.
32. **Establish measurable baseline conditions and monitoring indicators** before implementing restrictions or reclamation.
33. **Adopt objective monitoring thresholds and graduated management responses.**
34. **Require causal analysis separating route effects from wildfire, drought, livestock, extreme weather, adjacent development, and unauthorized travel.**
35. **Establish a two-way adaptive-management process** allowing both additional protection and restoration of access.
36. **Create a formal route-reopening procedure** based upon successful mitigation, changed conditions, corrected data, new science, and demonstrated public need.
37. **Publish annual monitoring and implementation reports.**
38. **Conduct strategic monitoring on a scheduled basis**, not solely as staffing and funding permit.
39. **Enter cooperative stewardship agreements with UPLA, local clubs, Kane County, and qualified partners.**
40. **Complete signing, mapping, and public education before enforcing changed designations.**



41. **Publish accurate downloadable GIS data, georeferenced maps, printed maps, and a route-name crosswalk.**
42. **Focus enforcement on unlawful and damaging conduct**, including cross-country travel, vandalism, route proliferation, dumping, and violation of targeted restrictions.
43. **Do not physically reclaim a route until BLM has verified jurisdiction, valid existing rights, cultural and biological compliance, reclamation methods, funding, and access consequences.**
44. **Prepare route-specific reclamation plans** before claiming environmental benefits from closure.
45. **Disclose whether closed routes will remain available for authorized use**, because continued traffic may limit claimed restoration benefits.
46. **Prepare a five-year implementation budget and schedule.**
47. **Prioritize funding for safety-critical connectors, high-use loops, route delineation, drainage, and resource-protection measures.**
48. **Conduct a public five-year review of the travel network** and reconsider routes based upon monitoring and changed circumstances.
49. **Respond substantively to UPLA's general, resource-specific, alternatives, and route-specific comments.**
50. **Issue a revised or supplemental EA before a FONSI if necessary** to correct material analytical deficiencies and disclose the effects of the selected Modified Alternative D.

CLOSING

The Trail Canyon Travel Management Area is an extraordinary multiple-use landscape. It supports motorized and nonmotorized recreation, hunting, camping, sightseeing, photography, equestrian use, cultural-resource appreciation, wildlife conservation, grazing, State Trust Land access, private-property access, emergency response, and local tourism. These values do not exist independently. They are connected through the transportation network that allows the public, land managers, permittees, emergency responders, and local communities to reach and care for the landscape.

UPLA supports responsible travel management and recognizes that some routes may require maintenance, seasonal restrictions, targeted engineering, cultural-resource protection, habitat mitigation, or other management prescriptions. UPLA does not request unrestricted cross-country travel within the Trail Canyon TMP, construction of an uncontrolled route system, or disregard for sensitive resources. We support travel stewarded within a clearly designated and actively managed network.



The central question is whether BLM will manage that network or reduce it whenever a mapped resource is present. Closure may eliminate lawful use from a route, but it does not resolve the underlying management problem. A closed route may continue to convey runoff, remain visible for decades, be used by authorized users, attract unauthorized travel, or shift visitors onto less sustainable routes. Closure is not equivalent to restoration, and route reduction is not equivalent to sound stewardship.

Alternative D provides the strongest foundation because it preserves 95% of the evaluated route network while addressing identified resource concerns. It maintains recreation access, supports visitor dispersion, preserves destination access, and aligns most closely with FLPMA's multiple-use mandate. The record nevertheless supports further modification.

A Modified Alternative D should retain every route proposed open under Alternative D, restore priority routes whose public value substantially outweighs documented and manageable concerns, preserve essential connectors and loops, recognize motorized access as critical for disabled and elderly visitors, and apply active management before permanent closure.

The route reports themselves repeatedly demonstrate the reasonableness of this approach. They identify existing routes that concentrate travel, provide irreplaceable access, reduce cross-country disturbance, and can remain available with signing, maintenance, monitoring, barriers, or other prescriptions. The Implementation Guide provides the tools necessary to manage these routes. The Biological Opinion establishes that the action is not likely to jeopardize the listed species evaluated or adversely modify the identified critical habitat. The Class II survey letter supports the adequacy of the cultural inventory and concludes that additional limited sampling is not warranted. Together, these materials support evidence-based management rather than additional speculative closure.

UPLA and its members stand ready to assist with monitoring, maintenance, restoration, education, cleanup, and visitor stewardship. **The public should not be viewed solely as a source of impact. Local users are also an indispensable source of knowledge, labor, funding, reporting, and long-term care for these public lands.**

We thus urge the administrative and legal imperative for the BLM to correct the Draft EA's deficiencies, adopt Modified Alternative D, incorporate the attached route-specific recommendations, and issue a final decision preserving broad, responsible, and sustainable access throughout the Trail Canyon TMA.



Utah Public Lands Alliance would like to be considered an interested public for the Trail Canyon Travel Management Plan. Information can be sent to the following address and email address:

Rose Winn
Utah Public Lands Alliance
PO Box 833, St. George, UT 84771
rose@utahpla.com

Sincerely,

Rose Winn
Natural Resources Consultant
Utah Public Lands Alliance
559.862.6382

Loren Campbell
President
Utah Public Lands Association
909.499.3295

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

References

Americans with Disabilities Act of 1990, 42 U.S.C. §§ 12101-12213.

Archaeological Resources Protection Act of 1979, 16 U.S.C. §§ 470aa-470mm.

Architectural Barriers Act of 1968, 42 U.S.C. §§ 4151-4157.

Bureau of Land Management. (2008). *Kanab Field Office record of decision and approved resource management plan*. U.S. Department of the Interior.

Bureau of Land Management. (2012a). *Travel and transportation management handbook* (H-8342-1). U.S. Department of the Interior.

Bureau of Land Management. (2013). *Estimating the nonmarket environmental values of Bureau of Land Management lands and resources* (Instruction Memorandum No. 2013-131). U.S. Department of the Interior.



Bureau of Land Management. (2015). *Connecting with communities: BLM Utah's recreation strategy*. U.S. Department of the Interior.

Bureau of Land Management. (2016a). *Manual 1626: Travel and transportation management*. U.S. Department of the Interior.

Bureau of Land Management. (2016b). *Travel and transportation management manual* (MS-1626). U.S. Department of the Interior.

Bureau of Land Management. (2021). *Blueprint for 21st century outdoor recreation*. U.S. Department of the Interior.

Bureau of Land Management. (2026a). *Trail Canyon Travel Management Plan environmental assessment: DOI-BLM-UT-P020-2026-0003-EA*. U.S. Department of the Interior.

Bureau of Land Management. (2026b). *Trail Canyon Travel Management Plan draft route reports*. U.S. Department of the Interior.

Bureau of Land Management, Kanab Field Office. (2026, June 29). *Section 106 consultation concerning additional phased Class II surveys for the Trail Canyon Travel Management Plan* [Letter to M. Reid].

Brooks, M. L., & Lair, B. (2005). Ecological effects of vehicular routes in a desert ecosystem. In R. H. Webb, L. F. Fenstermaker, J. S. Heaton, D. L. Hughson, E. V. McDonald, & D. M. Miller (Eds.), *The Mojave Desert: Ecosystem processes and sustainability* (pp. 168-195). University of Nevada Press.

Citizens Against Burlington, Inc. v. Busey, 938 F.2d 190 (D.C. Cir. 1991).

Clean Water Act, 33 U.S.C. §§ 1251-1388.

Council on Environmental Quality. (2020). *Update to the regulations implementing the procedural provisions of the National Environmental Policy Act*. 85 Fed. Reg. 43,304.
Endangered Species Act of 1973, 16 U.S.C. §§ 1531-1544.

Federal Land Policy and Management Act of 1976, 43 U.S.C. §§ 1701-1787.



Hammitt, W. E., Cole, D. N., & Monz, C. A. (2015). *Wildland recreation: Ecology and management* (3rd ed.). Wiley Blackwell.

John D. Dingell, Jr. Conservation, Management, and Recreation Act, Pub. L. No. 116-9, 133 Stat. 580 (2019).

Kleppe v. Sierra Club, 427 U.S. 390 (1976).

Larson, C. L., Reed, S. E., Merenlender, A. M., & Crooks, K. R. (2016). Effects of recreation on animals revealed as widespread through a global systematic review. *PLOS ONE*, 11(12), e0167259. <https://doi.org/10.1371/journal.pone.0167259>

Leung, Y.-F., & Marion, J. L. (2000). Recreation impacts and management in wilderness: A state-of-knowledge review. In D. N. Cole, S. F. McCool, W. T. Borrie, & J. O'Loughlin (Comps.), *Wilderness science in a time of change conference, Volume 5: Wilderness ecosystems, threats, and management* (Proceedings RMRS-P-15-VOL-5, pp. 23-48). U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station.

Marion, J. L., & Wimpey, J. (2007). Environmental impacts of mountain biking: Science review and best practices. In P. Webber (Ed.), *Managing mountain biking: IMBA's guide to providing great riding* (pp. 94-111). International Mountain Bicycling Association.

Motor Vehicle Manufacturers Association of the United States, Inc. v. State Farm Mutual Automobile Insurance Co., 463 U.S. 29 (1983).

National Environmental Policy Act of 1969, 42 U.S.C. §§ 4321-4370h.

National Historic Preservation Act, 54 U.S.C. §§ 300101-307108.

Norton v. Southern Utah Wilderness Alliance, 542 U.S. 55 (2004).

Ouren, D. S., Haas, C., Melcher, C. P., Stewart, S. C., Ponds, P. D., Sexton, N. R., Burris, L., Fancher, T., & Bowen, Z. H. (2007). *Environmental effects of off-highway vehicles on Bureau of Land Management lands: A literature synthesis, annotated bibliographies, extensive bibliographies, and internet resources* (Open-File Report 2007-1353). U.S. Geological Survey.

Rehabilitation Act of 1973, 29 U.S.C. § 794.



Robertson v. Methow Valley Citizens Council, 490 U.S. 332 (1989).

Southern Utah Wilderness Alliance et al. v. U.S. Department of the Interior et al., Consolidated Case No. 2:12-cv-00257 (D. Utah 2017) (settlement agreement).

Taylor, A. R., & Knight, R. L. (2003). Wildlife responses to recreation and associated visitor perceptions. *Ecological Applications*, 13(4), 951-963. [https://doi.org/10.1890/1051-0761\(2003\)13\[951:WRTRAA\]2.0.CO;2](https://doi.org/10.1890/1051-0761(2003)13[951:WRTRAA]2.0.CO;2)

The White House. (2026, May 29). *Removing unnecessary and counterproductive restrictions on access to federal lands*.

Trombulak, S. C., & Frissell, C. A. (2000). Review of ecological effects of roads on terrestrial and aquatic communities. *Conservation Biology*, 14(1), 18-30. <https://doi.org/10.1046/j.1523-1739.2000.99084>.

U.S. Department of the Interior. (2026a). *Department of the Interior handbook of National Environmental Policy Act implementing procedures* (516 DM 1).

U.S. Department of the Interior. (2026b). *National Environmental Policy Act implementing procedures: Final rule*.

U.S. Fish and Wildlife Service. (2022, February 7). *Biological opinion for the Trail Canyon Travel Management Plan*. U.S. Department of the Interior.

Wild and Scenic Rivers Act, 16 U.S.C. §§ 1271-1287.