

**BlueRibbon Coalition Initial Review:
Draft Resource Management Plan (DRMP) and
Draft Environmental Impact Statement (DEIS) for the
Utah Bureau of Land Management's (BLM)
Price Field Office (PFO)**

SUMMARY:

On July 16, 2004 the Utah Bureau of Land Management, Price Field Office released their Draft Resource Management Plan and Draft Environmental Impact Statement for public review and comment. More than two and a half years in the making, the draft plan is the first opportunity to view how BLM intends to manage natural resources, recreational activities, and other uses on more than 2.5 million acres of public lands in Carbon and Emery Counties during the next 15-20 years.

The Price land use plan is the first of seven draft plans that will be released over the next few years as a part of a statewide plan revision initiative in Utah. Until its release, it had been assumed the Price Field Office draft plan may serve as a "template" for the other field offices in Utah.

The DRMP includes some of the most restrictive recreation management on federally managed lands outside a National Park. All the alternatives contained in the document represent unprecedented change from current BLM management in Utah.

Although the National Environmental Policy Act (NEPA) requires a wide range of management alternatives, all the alternatives described in the document (except the "no action" alternative) contain very similar, highly restrictive management prescriptions. Through the use of overlapping and confusing management "layers" BLM will attempt to require the public to comply with similarly confusing layers of restrictions, permits and fees.

A "casual" read of any DRMP/DEIS or similar Land Use Plan revision isn't usually possible, however, the PFO Planning Team has succeeded in writing an almost totally incomprehensible document. Numerous errors, contradictions and omissions occur throughout and result in utter failure of the National Environmental Policy Act's (NEPA) disclosure requirements. Even professional land managers will have a hard time comprehending what all of the layers and restrictions will mean to the recreating public.

Regarding OHV management, the document is especially flawed. The document's mistakes and inconsistencies not only fail to inform the public, but actually *misinform* the public regarding how OHV use will be managed and which roads and trails will be open to vehicle recreation.

The problems are so numerous and so serious that BRC does not believe they can be legally remedied in a Final Environmental Impact Statement. Some have suggested the BLM should extend the comment period so that the public may have more time to try and understand what the BLM is proposing to do. While an extension in the comment period certainly wouldn't hurt, BRC believe that unless the BLM issues a Supplemental DRMP and DEIS, this plan is likely to end up in a morass of appeal, protest and litigation.

**The DRMP/DEIS and other information is available on BLM's website:
<http://www.pricermp.com>**

BACKGROUND:

The Draft Environmental Impact Statement (DEIS) is supposed to disclose to the public and decision makers how the agency has responded to management needs and issues identified during the Scoping phase of the planning process. A DEIS should clearly articulate management actions common to all alternatives and describe a wide range of management options (alternatives). The DEIS should include enough analysis so the reader can reasonably compare and contrast the various alternatives. A DEIS should also identify the agency's preferred alternative and include a rationale for that choice.

Chapter 2 describes **five alternatives** for the management of the Price Field Office:

Alternative 1, the “No Action Alternative” is required by the National Environmental Policy Act (NEPA) and represents the current management scenario. The No Action Alternative may or may not represent a viable management alternative. Importantly, the “No Action Alternative” serves as a baseline to compare and contrast the other alternatives.

Alternative A, the “Maximum Access and Development Alternative” is supposedly designed to allow maximum access and development of mineral resources, including oil, gas, coal bed natural gas, and coal allowed by law, with mineral resource development given primacy over other uses and resource consideration.

Alternative B, the “Balanced Alternative” is supposedly designed to balance uses in the Field Office. This balance is achieved by emphasizing different resources and uses in different areas of the Field Office.

Alternative C, the “Maximum Conservation and Protection” Alternative (A.K.A.: the “Still Not Enough for SUWA Alternative”) is supposedly designed to provide maximum conservation and protection for natural resources from mineral and energy development and motorized recreation use allowed by law. However, anti-access groups such as the Southern Utah Wilderness Alliance (SUWA) have lashed out at provisions in this alternative and have called for even more restrictive management.

Alternative D, the Preferred Alternative, is supposedly designed to provide for a wide variety of resource needs throughout the Field Office. According to BLM's DEIS, Alternative D is “similar to Alternative B in that it includes maximizing mineral development potential in areas with the greatest potential for recreation development, as well as targeting recreation management in areas with the highest potential for development, to provide for quality recreation settings, experiences, and benefits in an environmentally appropriate manner”.

Actions common to all alternatives:

General Management Actions:

- Recognize that various levels of regulations and limits are necessary. Restrictions and limitations on public uses should be as small as possible without compromising the primary goal.
- Use on-the-ground presence as a tool to protect public lands.

- Where long-term damage by recreational uses is observed or anticipated, limit or control activities through specialized management tools such as designated campsites, permits, area closures, and limitations on number of users and duration of use. Revise recreation management plans and management framework plans when they prove to be either overly restrictive or inadequate to maintain public land health.
- Coordinate with federal and state agencies, county and local governments, and tribal nations in recreation planning and managing traffic, search and rescue operations, trash control and removal, and public safety.
- Consider and, where appropriate, implement management methods to protect the resource, as well as maintain the quality of experience of the various user groups. These methods could include limitation of numbers, types, timing, and duration of use.
- Encourage the location of public land recreational activities near population centers and highway corridors by placement of appropriate visitor-use infrastructure. Provide restrooms and other facilities adequate for anticipated uses at designated campgrounds, trail heads, and other areas where there is a concentration of recreational users.
- Emphasize “Leave No Trace” camping and travel techniques throughout the PFO.
- OHV use will be allowed on designated routes in limited areas. It will not be allowed in areas closed to OHV use.
- OHV use for game retrieval will follow all area and route designations for OHV use.
- Allow mountain biking on all routes designated for OHV use and on June’s Bottom and Black Dragon Canyon routes and other routes or areas designated for mountain bike use. Designation of additional mountain bike areas or routes would occur through activity plans.
- Consideration of the Recreation Opportunity Spectrum (ROS)

Recreation Activity Prescriptions and Guidance

- Dispersed camping would be allowed throughout the Field Office without permit, unless otherwise described in the alternatives.
- Rock climbing would not be allowed above and within 300 feet of cultural sites. No climbing would be allowed within 300 feet of raptor nesting areas during nesting seasons. More specific climbing prescriptions may be identified in the SRMA alternatives and would be elaborated in any SRMA plan. Rock climbing restrictions could also be identified in the PFO ERMA.
- Campgrounds and dispersed camping areas in SRMAs could be closed seasonally or as impacts or environmental conditions warrant.
- Developed recreation sites will be recommended for withdrawal from mineral entry and either NSO or closed to mineral leasing.
- Developed recreation sites would be closed to grazing use.

Special Recreation Permits (SRP)

- Under all alternatives, SRPs would be issued as a discretionary action. SRPs are authorizations that allow for recreational uses of the public lands. They are issued as a means to control visitor use, protect recreational and natural resources, and provide for the health and safety of visitors. Commercial SRPs are also issued as a mechanism to provide a fair return for the commercial use of public lands.
- At the time of issuance, all types of SRPs would include standard stipulations—and could include other special stipulations—that are necessary to protect lands or resources involved, reduce user conflicts, or minimize health and safety hazards.
- Subject to NEPA analysis, SRPs would be issued to support recreation management objectives and resource protection.
- Under all alternatives there would be no change to permitting established by the current Desolation and Gray Canyons of the Green River, River Management Plan.

Heritage Tourism

- BLM would not issue SRPs for vending along scenic byways and back ways. Commercial activities would be directed to communities along the routes.
- BLM would work with local communities and other groups to foster heritage tourism throughout the PFO area.
- In accordance with BLM policy, no recreational collection of vertebrate paleontological resources would be allowed. Reasonable amounts of common invertebrate and plant fossils may be collected for noncommercial use.
- In accordance with BLM policy, the noncommercial collection of petrified wood would be limited to 25 pounds plus one piece per day per person and 250 pounds plus one piece per year per person.

RECREATION MANAGEMENT:

BLM is using a complicated concept of “layered management” to manage recreation.

Management “Layers” include, but are not limited to:

- Designating areas “open”, “limited” and “closed” to OHV use
- Within “limited” areas, designating specific routes open to OHV use
- Recreation Opportunity Spectrum (ROS)
- Designation of Special Recreation Management Areas (SRMA)
- Designating “High Use Areas”
- Designating Area of Critical Environmental Concern (ACEC)
- Designating “Large Group Areas” (LGA)
- Special Recreation Permits (SRP)

SPECIAL RECREATION MANAGEMENT AREAS (SRMA)

BLM’S PREFERRED METHOD TO MANAGE RECREATION

BLM will use Special Recreation Management Areas (SRMA’s) to manage recreation in the PFO. The SRMA is a valid tool for the BLM to use in management of various activities and to make specific use allocation decisions. However, the PFO is testing the limits of the SRMA concept with additional layered management such as ROS prescriptions and “High Use Area” designations.

Currently, there are four SRMA’s in the PFO. In the Preferred Alternative (Alternative D) the BLM proposes expansion of existing SRMA’s and the designation of an additional SRMA. All recreation management activities and developments in the SRMA would be in support of the individual SRMA goals and objectives. All SRMAs would be designated as special areas (Land and Water Conservation Fund definition) and where needed could require permits and payment of fees for recreation use. Additional “Activity Plans” would be reviewed or created for all SRMA as designated in the RMP.

BLM’S PROPOSED SRMA’S (as described in the Preferred Alternative):

Desolation Canyon SRMA:

The purpose of the Desolation Canyon SRMA is to maintain the natural character of the canyon environment in Desolation and Gray canyons, provide a continuing opportunity for a quality wilderness experience between Sand Wash and Nefertiti rapid, provide an opportunity for day use recreation below Nefertiti rapid, and protect the scientific value of the cultural resources while allowing for visitor enjoyment. Permits would be issued for guided tours, shuttle and livery services along with special area SRPs for noncommercial groups.

Under the Preferred Alternative, the current Desolation Canyon SRMA would be expanded to include the Desolation Canyon WSA (See Map 2-21 in DRMP - DEIS Volume 2 – Appendices and Maps)

The Desolation Canyon SRMA would be closed to OHV use, except the Sand Wash, and lower Gray Canyon recreation sites. The Range Creek Jeep trail would be designated for OHV use to the lowest drill hole.

Motorized boating use would be limited to flows below 5,000 cfs, and only 4-stroke motors would be allowed. A maximum of 90 motorized boats would be allowed in the SRMA per year.

Cleveland Lloyd Dinosaur Quarry (CLDQ) SRMA:

The CLDQ is an 80-acre National Natural Landmark and is also designated as a SRMA. The purpose of this designation is to provide for public education and interpretation of paleontological resources and associated geology.

Recreation facilities would be developed for visitor safety, convenience, and comfort and to enhance viewing of paleontological resources and understanding of the scientific processes. Fires would be permitted only in BLM-provided fire pits. CLDQ is day-use only and closed to dispersed camping. CLDQ would be closed to disposal of mineral materials. **Recreational OHV use in CLDQ SRMA would be closed.**

Labyrinth Canyon SRMA:

The purpose of the Labyrinth Canyon SRMA is to jointly manage recreation on a popular section of the Green River with the Utah State Division of Forestry, Fire and State Lands and the Moab Field Office for floating access that provides for the use and enjoyment of the area. The SRMA would emphasize opportunities for flat water and novice river corridor recreation in a semi-primitive recreation setting.

An activity plan for the Labyrinth SRMA would be developed to address recreational uses. Carrying capacity. SRPs would be required for all recreational users within the SRMA. SRPs would be available for commercial tours, shuttle and livery services, organized groups including the Friendship Cruise, and competitive events. No facilities would be constructed in P class areas; minimal facilities would be used in SPNM and SPM class areas and would be used only to protect critical resources. Management facilities and presence would be maintained at the Mineral Bottom takeout. Travel planning including road and trail designations for all uses (foot, horse, mountain bike, etc.). OHV road and trail designations were made in the San Rafael Route Designation Plan.

Nine Mile SRMA:

The purpose of the Nine Mile Canyon SRMA would be to manage recreation and interpretive activities related to the cultural and historic resources in the area. Under the Preferred Alternative, the Nine Mile area/SRMA would be managed according to the 1995 Recreation and Cultural Area Management Plan except as modified by the management alternatives listed below. Such changes include VRM classification. **All Semi Primitive Non Motorized ROS class lands in the Nine Mile SRMA would be close to OHV use.**

OF SPECIAL CONCERN TO OHV RECREATIONISTS:

San Rafael Swell SRMA:

The purpose of the San Rafael Swell SRMA is “to provide for a wide spectrum of recreation opportunities that emphasize expansive landscapes of unique scenic geology, as well as cultural and paleontological resources”. According to the BLM; “management of the area will use methods that allow responsible recreational use in appropriate settings”.

Under the Preferred Alternative, the boundaries of the San Rafael SRMA would be expanded to include Mexican Mountain WSA, the Cedar Mountain area, and the area surrounding the cut-off road. (See Map 2-21 in DRMP - DEIS Volume 2 – Appendices and Maps)

The San Rafael Swell SRMA is home to several world class recreational trail systems, including two very popular OHV trail systems; the Temple Mountain Motorcycle trails (A.K.A. The Dick Brass Trail System) and the “Four Routes in Sids” which includes “Fix It Pass”, Eva Conover Road, North and South Coal Washes and the infamous Devil’s Racetrack.

Also included in the San Rafael SRMA: Behind the Reef Road, Eagle Canyon, Hidden Splendor Mine area, Temple Mountain area, the popular Head of Sinbad and Swasy’s Cabin.

Except in the highly unlikely event the BLM selects the “no action” alternative, the San Rafael Swell will receive unprecedented restrictions on all human access and use of this popular recreation area. Even under the Preferred Alternative (supposedly a “balance” of uses), every human activity, even day hiking, will be highly restricted. Camping will be strictly limited to “designated sites” and “designated areas” and extremely tight group size limits will be imposed.

Perhaps by design, it is almost impossible to totally comprehend all the various restrictions and management provisions the BLM plans for this area. Overlapping management designations or “layers” within the San Rafael SRMA include, but are not limited to ACEC’s, High Use Areas, Designated Camping Areas, Recreation Opportunity Spectrum (ROS) limits and other permit requirements.

BRIEF DESCRIPTION OF MANAGEMENT “LAYERS” IN SRMA’S

Off-Highway Vehicle Area Designations:

BLM is required by regulation to designate areas as “open”, “limited” and “closed” to OHV use. The “open” designation means that vehicle use is virtually unrestricted, where cross country travel is allowed. “Limited” can have a variety of limitations on vehicle travel, such as seasonal limitations, limited to existing roads and trails, limited to designated roads and trails or even certain vehicle type limits. “Closed” means closed.

The DRMP and DEIS contains conflicting information regarding the OHV area designations, in some places stating that “all OHV recreational activity will be subject to designated trails” (all alternatives DRMP/DEIS 2-86), but in other areas stating that “Small open areas for OHV use would be considered near local communities and managed by BLM” (Alternative A DRMP/DEIS 2-86).

For all lands in the “limited” category, BLM will implement a “limited to designated route” paradigm (DRMP/DEIS 2-15).

Off-Highway Vehicle Route Designations:

In most of the San Rafael Swell SRMA, BLM has made road and trail designations pursuant to the San Rafael Route Designation Plan¹ (SRRDP) which was signed into effect just last year. Will the SRRDP be incorporated into the alternatives? When contacted by BRC via telephone, members of the Planning Team say yes, but it’s not at all clear from the document.

According to the DRMP/DEIS, the SRRDP will be incorporated into the Labyrinth Canyon SRMA. But for the important San Rafael Swell SRMA, the DRMP/DEIS is much more cryptic. The DRMP/DEIS only references the SRRDP as a ‘footnote’ when describing a future Activity Plan. Importantly, BLM left out all routes from the OHV Route Designation Map for the Preferred Alternative (Map 2-56), leaving the public to guess how the SRRDP will be incorporated into each alternative.

Other management “layers” such as “High Use Area” designation, ACEC management and Recreation Opportunity Spectrum (ROS) may alter the SRRDP. BRC continues to identify inconsistencies with management “layers” and the SRRDP that may require closure of popular OHV routes.

This is one of the many areas where this DRMP/DEIS fails to accurately disclose to the public where OHV use will be allowed and how recreational use will be managed.

Outside the SRRDP planning area, BLM is planning to make site specific route designations in this planning process. Please see: “RECREATION MANAGEMENT FOR THE REMAINING LANDS IN THE PFO” on page 9.

RECREATIONISTS ARE CAUTIONED TO CAREFULLY EXAMINE THE SRRDP AS WELL AS BLM’S PROPOSED OHV ROUTE DESIGNATIONS (MAPS 2-54, 2-55 AND 2-56) AND COMPARE THEM WITH ROS DESIGNATIONS (MAPS 2-17 THROUGH 2-21) FOR INCONSISTENCIES THAT WILL ALLOW BLM TO CLOSE ROADS AND TRAILS!

Recreation Opportunity Spectrum (ROS)

Within SRMAs, BLM will (apparently) attempt to use a Recreation Opportunity Spectrum regime to manage for recreation use. (See ROS inventory maps 2-17 through 2-21 and Appendix 15 for description of ROS settings).

¹ The DRMP/DEIS refers to the San Rafael Route Designation Plan as the San Rafael Motorized Route Designation Plan.

Briefly stated, ROS provides a framework for defining classes of outdoor recreation environments, activities, and experience opportunities. Traditionally, the ROS is divided into six classes: Primitive (P), Semi-primitive non-motorized (SPNM), Semi-primitive motorized (SPM), Roaded Natural (RN), Rural (R), and Urban (U). ROS is a valid management tool to manage recreation on National Forests and BLM lands. ROS can be used a variety of ways, including as an inventory, a “desired future condition”, as a “guideline” or as a “standard”.

In all of the SRMA’s, except the San Rafael Swell SRMA, the PFO has adopted ROS designations as a “hard and fast” standard, meaning that all motorized routes within the P and SPNM designations will be closed.

The document seems to be silent about how ROS designations will affect vehicle use in the San Rafael Swell SRMA. Several designated routes pass within and through SPNM designations. If the BLM chooses to adopt the same management as the other SRMA’s it may well require the closure of these popular roads and trails.

RECREATIONISTS ARE CAUTIONED TO CAREFULLY EXAMINE ROS DESIGNATIONS IN EACH ALTERNATIVE!!

Group Size Limits:

The BLM has developed an unprecedented policy limiting “group size” in the San Rafael SRMA. BLM will limit group size via the ROS proscription:

Alternative A	Alternative B	Alternative C	Alternative D (Preferred Alternative)
P: 15 People SPNM: 25 People SPM: 25 People RN: 50 People (except in designated large group sites)	P: 12 People SPNM: 20 People SPM: 20 People RN: 30 People (except in designated large group sites)	P: 10 People SPNM: 15 People SPM: 15 People RN: 20 People (except in designated large group sites)	P: 15 People SPNM: 25 People SPM: 25 People RN: 50 People (except in large group sites)

Groups larger than these limits would be required to get a Special Recreation Permit. Group size limits may be further limited through plan maintenance or activity-level planning.

Large Group Gatherings

Groups larger than the numbers identified (in the SRP section) for the ROS class in the area of use would require an SRP, unless using a designated large group area. Large group gatherings would be limited to 6 designated Large Group Areas (LGA).

In one alternative, Alternative A, use of LGA’s would be “made available through **concessionaire-issued recreation use permit**”. The other Alternatives specify that LGA’s are available only through reservation only, and the subject to stipulations imposed by the Special Recreation Permit process (SRP).

“High Use Areas” designation restrictions (See Map 2-22 through 2-25)

The BLM has further restricted recreational activities with the proposed designation of “High Use Areas”. Restrictions include, but are not limited to:

- Camping would be permitted only in developed or designated sites.
- No firewood gathering would be permitted in the high-use areas.
- Fires would be permitted only in fire pans or BLM-provided fire grills.
- Portable toilets may be required at designated campsites that do not provide toilet facilities.

Other restrictions may be imposed via an “activity-level plan” (which is apparently in addition to and would overlay the Activity Plans mentioned below) for the “High Use Areas”, and include the most restrictive recreation management seen outside a National Park.

Indeed, one alternative, Alternative C, requires a reservation based permit system for any recreational access to the “High Use Area”. Another alternative, Alternative A, would apparently turn over management of recreational use to private, for-profit firms (concessionaires) that would be allowed to charge fees for, camping, other uses and services (including hiking).

According to the BLM: “fees would be commensurate with lease value, comparable-market recreation fees, and cost of services provided or the OHV trail system.”

Activity Plans

According to the DEIS, the BLM would be required to complete a “San Rafael SRMA Activity Plan” within 5 years from the date the new RMP is final. The activity plan could include strict limits on:

- Campfires and firewood gathering
- Vehicle camping
- Pack stock use
- Additional “trail designations” for foot, horse and mountain bike travel

Areas of Critical Environmental Concern (ACEC):

Here is where it gets really confusing. An ACEC is a valid management tool to protect “relevant and important values”. Each ACEC is supposed to include a site specific management plan designed to protect those relevant and important values. Under the preferred alternative ten of the currently designated ACECs would remain, and several Additional ACECs will be created.

Recreationists are strongly cautioned to carefully examine how ACEC’s will affect recreation management (see DRMP/DEIS 2-106 through 2-130). ACEC management can be very restrictive, and may conflict with ROS or OHV route designations.

ACEC MANAGEMENT WILL AFFECT YOUR RECREATIONAL ACCESS!!

RECREATION MANAGEMENT FOR THE REMAINING LANDS IN THE PFO:

Confused yet? **Just wait!** The recreation management prescriptions for the remaining lands in the PFO are guaranteed to baffle and confuse you even more.

BLM calls any lands not designated a SRMA, the “Extensive Recreation Management Area” (ERMA) (see DRMP/DEIS 2-82 through 2-84). A similar mish-mash of overlapping management “layers” exist within the “ERMA”, but are not quite as restrictive. Knowing what, when and where restrictions will apply, however, is nearly impossible to determine from the information disclosed to the public in the DRMP/DEIS.

OF SPECIAL CONCERN TO THE OHV COMMUNITY:

The BLM seems to be “playing possum” with the OHV community. The Preferred Alternative, references the popular Chimney Rock/Summerville trail systems and Arapeen Trail connector routes and implies they will be designated as open to vehicle use (see DRMP/DEIS 2-82, 2-83). Can the public reasonably assume these popular OHV routes will remain open? Sadly, it doesn’t appear so.

OHV users should be concerned that none of these popular trail systems are included in the Preferred Alternative OHV Designation Map! (DRMP/DEIS Volume 2 Appendices & Maps, Map 2-56).

But that’s not all. The mistakes and inconsistencies in the document seem to cross a line in this important issue by *misinforming* the public regarding which roads and trails will be open to vehicle recreation.

How? Not only does BLM’s OHV Route Designation Map fail to include the Chimney Rock/Summerville trail systems, it includes nearly 100 miles of *paved roads!* In fact, the vast majority of the ‘green lines’ BLM has represented to the public as “open for OHV use” (Map 2-56) are currently *closed* to unlicensed, OHV use.

What is BLM planning for OHV use in the Price Field Office? It is simply impossible to tell. We’ve analyzed the document, met with the Planning Team and tried our best to discern how the various alternatives will affect the recreating public. Each time we think we’ve put our finger on the BLM’s plan, another “layer” pops up that changes everything.

The lack of information is one thing. A certain degree of inaccuracy, it can be argued, is to be expected considering the massive scope of such planning projects. What isn’t understandable is the *misinformation*.