



CITIZENS FOR DIXIE'S FUTURE
Energizing conservation in southwest Utah

Bureau of Land Management
St. George Field Office
345 East Riverside Drive
St. George, UT 84790

October 15, 2015

Dear St. George RMP Planning Team:

As part of the public comment process Citizens for Dixie's Future (CDF), together with the Great Old Broads for Wilderness, Center for Biological Diversity, and Southwest Utah Broadband (collectively, "we"), are submitting the following comments on the Beaver Dam Wash and Red Cliffs National Conservation Areas (NCAs) Draft Resource Management Plans (RMP) and St. George Field Office (SGFO) RMP Draft Amendment. We appreciate the hard work that has gone into the RMPs and Amendment, and the development of a visually pleasing, easy-to-navigate, informative, and comprehensive document.

Citizens for Dixie's Future (CDF) is a grassroots coalition of local citizens committed to being stewards of the area's natural and cultural resources and to be advocates for Smart Growth that enables conservation of those resources for the benefit of present and future generations. CDF was established in 2006 after the Washington County Growth and Conservation Act (Lands Bill) was introduced because of concerns that 25,000 acres of BLM land would be sold for development. CDF worked tirelessly on revisions to the bill that resulted in designation of the Red Cliffs and Beaver Dam Wash National Conservation Areas in the 2009 Omnibus Public Lands Management Act.

Many CDF members and supporters live near and recreate in the Bureau of Land Management lands in Washington County Utah. These lands provide unique opportunities for hiking, camping, trail running, mountain biking, appreciation of archaeological resources and natural quiet, journaling, birdwatching, ecosystem research, photography and more.

The Center for Biological Diversity works to protect and restore habitats for imperiled species, and has over 825,000 members and on-line activists who care about the stewardship of our public lands, including members who reside in Utah and Nevada and visit and utilize the public lands affected by the proposed plan, and are active in protecting the species and ecological value at stake there.

The Southwest Utah Broadband of the national organization Great Old Broads for Wilderness (one of 30 local chapters of this 5,000 member organization) supports the thorough analysis, recommendations, and endorsement of Alternative C detailed in the Citizens for Dixie's Future (CDF) comment letter. Our member representatives have engaged with CDF before and during the Draft Resource Management Plans review process; the endorsement of Alternative C and the accompanying recommendations resonate with our organization's values of informed activism committed to protecting wild lands.

Overall, we support the Alternative C within each of the NCA RMPs because it has fewer human impacts and best meets the purpose for which the NCAs were set aside by Congress in the Omnibus Public Lands Management Act of 2009 (OPLMA), to "conserve, protect, and enhance for the benefit and enjoyment of present and future generations the ecological, scenic, wildlife, recreational, cultural, historical, natural, educational, and scientific resources." We have attempted to make our comments as specific as possible, including response to elements of the preferred Alternative B, across various resources and issues so they are most helpful for your efforts in developing the final NCA plans and RMP amendment.

We realize the BLM faces pressures from various interests, including historic uses that preceded the OPLMA and other demands that are emerging in our rapidly growing area. Our prime goal in the context of the RMP process is to inform growth in Southwestern Utah that "enables conservation and restoration of its natural and cultural resources." Stressing the conservation of the area's remarkable environmental resources, we feel, offers a win-win for all uses to continue sustainably over the life of the plan.

The remainder of our comments are divided into five main sections as follows: General Recreation and Visitor Services Comments; Northern Transportation Route; Beaver Dam Wash NCA RMP; Red Cliffs NCA RMP; and ACEC designations and Other SGFO RMP Amendment Comments.

I. General Recreation and Visitor Services Comments

Recreation Designations

Looking at the recreation management philosophy for both NCAs, we supports the change to the Beaver Dam Wash NCA from the Existing Recreation Management Area to Special Recreation Management Area (SRMA) and the SRMA designation for Red Cliffs NCA. As stated in the RMP, with the SRMA designations, "Proposed management zones are designed to assist the BLM staff in deciding where management controls are employed and future funds are spent" (p. 827). This provides obvious advantages for efficient management of recreation activities. Having said that, we have concerns about the RMPs' treatment of recreation in balance with the NCAs' requirement to protect critical habitat of desert tortoise and other environmental values. The RMP includes only a general statement about managing recreation in relation to special status and sensitive species, found in Section 4.19.2.7: "Constraints may include closures either long or short term of specific lands to organized, competitive, and even casual recreation uses to protect habitat impacts or to prevent disturbances to species during key periods such as breeding or

migration. Restrictions may also be imposed on the development of new trails or other recreation facilities within designated critical habitats” (pp. 707-708).

With specific reference to the Red Cliffs NCA, the enabling legislation clearly recognized recreation as one of the values of the NCA. Even though it lacked an official BLM SRMA designation, this NCA has been effectively managed as an SRMA since the adoption of the Public Use Plan (PUP) for the Red Cliffs Desert Reserve in June 2000. This document was tiered to the Washington County Habitat Conservation Plan, and it recognized the value of this open space for dispersed, non-motorized recreation opportunities. It also recognized that recreation uses need to be intensively managed in order to protect the critical desert tortoise habitat that was the driving force behind the Red Cliffs Desert Reserve. Because of the overlap of critical habitat, urban interface, and existing recreation management, SRMA status is appropriately proposed in all action alternatives.

Resource Protection

We recommend more specific direction be included in the plans for how BLM will protect resources in the context of recreation activities, including the following:

1. The Red Cliffs RMP should more strongly emphasize to recreational users that the Red Cliffs NCA was set aside as mitigation, and protecting tortoise habitat is its foremost purpose. In addition, there should be emphasis that the Beaver Dam Wash NCA is designated critical habitat for the desert tortoise.
2. BLM must take specific steps to prioritize purposes of the legislation for each NCA RMP, because it isn't clear what value is most important to protect and how it will be protected.
3. Based on the above prioritization, BLM can then add management tools in the Recreation and Visitor Services goals and objectives (p. 139 and p. 257), including the development of a management structure that would allow the ability to balance recreation use with resource preservation in a justifiable and defensible plan that has clear direction for implementation. We support BLM's proposed activity level plan (RAMP) that will be prepared to guide management of the recreation zones and include adaptive management options, indicators, and thresholds to identify how levels of change would be measured and management modified to protect NCA values as well as management guidelines (Appendix H, p. 1093). We would like to see greater consideration of recreation activity impacts on environmental resources, e.g. through development of a matrix of thresholds, trigger-points, and limits, so administrative action can be taken to close an area or trail to preserve the tortoise habitat and other natural resources of the NCAs.
 - a. As an example of a recreational management tool, the Grand Staircase-Escalante National Monument Management Plan 2000 (page 43) states that “the Monument will use indicators to determine when and where visitor allocations need to be made. (1) resource damage (e.g. proliferation of campsites, human waste problems, social trails etc.) (2) conflicts with threatened and endangered species... (3) the number of social encounters becomes unacceptable.”

4. We are pleased to see the inclusion of adaptive management principles (pp. 48-50) within the framework of the RMP's management actions. We strongly advocate adaptive management of the NCAs to maintain the current level of enjoyment of their recreational opportunities and unique characteristics, while recognizing that increased future use will trigger the need for increased levels of management. We are concerned however, that without specific monitoring triggers, developed with input from stakeholders, the adaptive management will be in name only. BLM must in the final EIS be more specific about the adaptive management process they envision.
5. The RMP's recreation analysis includes the following assumption: "The basic restrictions on the type of allowable recreation activities identified for critical tortoise habitat will remain in place" (p. 1093, Appendix H). A question we have, in the face of declining tortoise numbers: *Are these restrictions enough?* In the Red Cliffs NCA, there are existing local impacts on desert tortoise habitat in areas such as Paradise Canyon.

II. Northern Transportation Route

Habitat Conservation Plan

We are concerned about the continued push by local officials for a northern corridor highway through the Red Cliffs NCA. Given that the Mojave desert tortoise has suffered significant population decline in the Red Cliffs Desert Reserve (from an average of 24 adult tortoises per square kilometer in 1998 to an average of 11 adult tortoises in 2013 in the core of the reserve north of I-15 and east of SR 18¹ – the area for the proposed northern corridor), it is even more important to protect the best prime habitat from a proposed highway. The Washington County Habitat Conservation Plan (HCP) was established in 1995 for the Red Cliffs Desert Reserve, and represents a legally binding agreement between the United States Fish and Wildlife Service (USFWS) and Washington County, the permit holder. The HCP formed the basis for the issuance of an Incidental Take Permit (ITP) for the federally listed Mojave desert tortoise, a permit that was given to Washington County by the USFWS (Section 10a(1)(B) of the Endangered Species Act), allowing the county and state to develop lands outside of the HCP. The take permit was signed in February 1996 by the Town of Ivins, the Utah Department of Natural Resources, the USFWS, and Washington County (RMP p.512).

Ironically, Washington County applied for \$23 million of Federal funding from the Land and Water Conservation Fund (LWCF) to purchase land within the NCA to prevent habitat fragmentation and now the County wants to build a highway through this land. For the Washington County Habitat Conservation Plan, Utah, the LWCF website reads:

“Utah’s Washington County is one of the fastest growing retirement and recreational areas in the nation. New residents are attracted in part by the exceptional red rock landscape, and tourists converge to visit Zion National Park and the Dixie National Forest. The county is also home to the highest density of Mojave desert tortoises in the United States. From 1980 to 1990, the population of the county increased 86 percent, and

¹ *Regional Desert Tortoise Monitoring in the Red Cliffs Desert Reserve, 2013*, publication number 14-15.

this trajectory has continued since then. In order to protect the desert tortoise, along with a number of other species, Section 6 funding has helped to build a 62,000-acre reserve, allowing for continued growth and development elsewhere in the county in compliance with the Endangered Species Act. This investment of nearly \$23 million from LWCF has prevented further fragmentation of habitat, established wildlife corridors and connectivity, and brought stakeholders together to manage the community's resources collectively and solve a very difficult problem.”

Additionally, according to USFWS, over \$90 million has been spent in various BLM trades and exchanges to acquire property to preserve it for tortoise habitat.²

In CDF RMP scoping comments in 2010, CDF noted that the northern corridor proposal was already examined in a NEPA process for improvements to the Red Hills Parkway and eliminated from consideration. According to the Red Hills Parkway Environmental Assessment, the USFWS stated in a letter, “such a road would compromise the commitments on which the Washington County Habitat Conservation Plan (HCP) was based...and may result in an adverse modification of designated critical habitat.”³

The HCP was signed by the USFWS, the Washington County Commission, the Utah Department of Natural Resources, and BLM in 1995, it never included a plan to build a new highway through the Red Cliffs Desert Reserve.⁴

Given that a northern corridor highway would be a blatant violation of the HCP and ITP, we remain adamantly opposed to a Northern Transportation Route. Additionally, we support the BLM in its strong presentation of the negative environmental impacts of such a potential highway project and the impossibility it would pose for BLM's efforts to manage the Red Cliffs NCA in accordance with the purposes presented in the initiating legislation of the OPLMA (and as part of the National Conservation Lands system).

OPLMA Language & Alternative D Environmental Consequences

As stated in the RMP, “OPLMA at Section 1977 (b) 2 (A) directs that the Secretary shall, while developing the comprehensive travel management plan for Washington County and in ‘consultation with appropriate Federal agencies, State, tribal, and local governmental entities (including the County and St. George City, Utah), and the public, identify one or more alternatives for a northern transportation route in the County” (p. 33). In addition, any new highway would have to comply with federal environmental laws.

The BLM has satisfied this condition by identifying several northern transportation routes within Alternative D. Per its legally binding requirements under federal environmental laws, the BLM

² Article, St George News, May 29, 2015, Julie Applegate, *Developer pushes for resolution from Habitat Conservation Plan, Sand Hollow land swap compromise*, see at: <https://www.stgeorgeutah.com/news/archive/2015/05/29/jla-developer-pushes-for-resolution-from-habitat-conservation-plan-sand-hollow-land-swap-compromise/#.VgnmCZd9DsU>

³ Red Hills Parkway EA 2007, Section 4 (f) evaluation State Route 18 to Industrial road, UDOT, Federal Highway of Transportation, page 2-9. The Northern Corridor was studied as an alternative.

⁴ Habitat Conservation Plan, Washington County. Utah, Washington County Commission Dec 1995

has also disclosed impacts from such potential highway alignments and has clearly indicated that the associated impacts would not comply with these laws, and would be severely detrimental to the Red Cliffs NCA and not within the purposes of the legislation that established the NCA.

A few of the environmental consequences associated with the designation of new utility and transportation corridors in Alternative D that caught our attention follow.

Such a transportation route:

- ...“could damage or destroy fossil resources of scientific interest within some or all of this acreage over the life of the RMP” (p. 755).
- ...”could have a measurable and potentially negative impact on cave resources as these have been documented within the proposed boundaries of this new corridor. The construction of a new highway or water lines could alter drainage patterns that impact cave ecosystems or increase public access, resulting in vandalism to cave structures or fauna” (p. 760).
- “could alter drainage patterns directly or indirectly impacting surface water sources located downstream on state and private lands” (p. 766).
- Exclusion of new transportation and utility facilities would “not only minimize the potential for new infestations of noxious weeds and invasive species, but would also help to sustain healthy, native vegetation, which would make these area less susceptible to weed invasions” (p. 778).

And:

- “A new multi-lane roadway, constructed along any of the alternative alignments proposed by Washington County, would fragment habitat. Injuries and mortalities to tortoises during new utility developments or roadway construction could occur, as this area has some of the highest tortoise densities documented in the Upper Virgin River Recovery Unit” (p. 789).
- “The potential impacts on desert tortoise populations as a result of some level of adverse modification to as much as 4,281 acres of designated critical habitat could threaten the viability of tortoises in the Upper Virgin River Recovery Unit” (p. 790).
- The Upper Virgin River Recovery unit was “identified as the smallest and most at risk recovery unit within the Mojave desert tortoises’ range by the USFW’s Mojave Desert Tortoise Recovery Plan (1994, revised 2011). Management of the Reserve land base focuses on the protection of habitat and tortoise populations through restrictions on land uses and human activities (p. 790).
- The Incidental Take Permit issued to Washington County in 1996 for over 12,000 acres of non-federal lands “does not authorize the incidental take of tortoises or the adverse modification of critical habitat within the boundaries of the Reserve” (p. 791).

Perhaps the clearest summary of the significant legal ramifications is presented in the RMP, with the statement that management decisions under Alternative D relating to its development of transportation and utility facilities “would not meet the Congressional mandate that BLM ‘conserve, protect, and enhance’ the resource values of the NCA, and in particular, all species listed under the protection of the ESA that occur in the NCA” (p. 790). In addition, “the potential loss or damage to heritage resources, even within the context of having adverse effects mitigated through data recovery treatments, would not be in conformance with the

Congressionally-defined purpose of the NCA, which is the “conservation, protection, and enhancement of the cultural and historic values of the NCA” (p. 805).

III. Beaver Dam Wash NCA RMP

Desert Tortoise Recovery Plan

Our most substantial comment for the Beaver Dam Wash NCA is to include in the plan the recommendations in the Desert Tortoise Recovery Plan 2011 for the area. We don't agree with BLM that the NCA can tolerate the different human and grazing impacts as proposed in Alternative B and still recover the tortoise populations.

The recovery plan recommends⁵:

- *Recovery Action 2.9, Secure lands/habitat for conservation* - Recommends conserving sensitive areas that would connect functional habitat or improve management capability of surrounding areas, such as inholdings within tortoise conservation areas that may be open to renewable energy development.
- *Recovery Action 2.11, Connect functional habitat* - Recommends connecting blocks of desert tortoise habitat, such as tortoise conservation areas, in order to maintain gene flow between populations.
- *Recovery Action 4.3, Track changes in the quantity and quality of desert tortoise habitat* - Recommends quantifying the loss or restoration of habitat as it relates to potential energy and other projects.
- *Recovery Action 5.5, Determine the importance of corridors and physical barriers to desert tortoise distribution and gene flow* - This action, in part, would determine the effects of corridors and barriers like energy development, on desert tortoise movement and recovery.

Similarly, the Plan's “Recovery Strategy” specifies:

2. Protect Existing Populations and Habitat.
 - 2.1. Conserve intact desert tortoise habitat.
 - 2.2. Minimize factors contributing to disease (particularly upper respiratory tract disease).
 - 2.3. Establish/continue environmental education programs.
 - 2.4. Increase law enforcement.
 - 2.5. Restrict, designate, close, and fence roads.
 - 2.6. Restore desert tortoise habitat.
 - 2.7. Install and maintain urban or other barriers.
 - 2.8. Sign and fence boundaries of sensitive or impacted areas.
 - 2.9. Secure lands/habitat for conservation.
 - 2.10. Restrict off-highway vehicle events within desert tortoise habitat.
 - 2.11. Connect functional habitat.

⁵ US Fish and Wildlife Service Desert Tortoise (Mojave Population) Recovery Plan 2011, page X

- 2.12. Limit mining and minimize its effects.
- 2.13. Limit landfills and their effects.
- 2.14. Minimize excessive predation on tortoises.
- 2.15. Minimize impacts to tortoises from horses and burros.
- 2.16. Minimize impacts to tortoises from livestock grazing.

Livestock Grazing

Based on the direction provided by the Desert Tortoise Recovery Plan, we urge the BLM or a non-government agency purchase and retire the existing grazing permits (as presented in Alternative C). In a practical sense, having grazing allotments co-existing with recreational users of all types proposed in Alternative B will degrade critical habitat of the desert tortoise and create management problems. The seasonal grazing in Alternative B will allow cattle to eat the young grasses that the tortoises eat, and this will further stress the tortoises. In addition, continued grazing in this very dry, fragile desert environment is not consistent with the purpose of the NCA in OPLMA to “conserve, protect, and enhance for the benefit and enjoyment of present and future generations the ecological, scenic, wildlife, recreational, cultural, historical, natural, educational, and scientific resources.”

Although there will be economic impacts from eliminating grazing, the RMP notes, “Given the low number of AUMs available in the NCA compared to the AUMs utilized by a typical livestock operation, and the fact that use of these AUMs is split between several operators, it is unlikely that the loss of access to all AUMs in the NCA ... would lead to this result” (to a livestock operator having to go out of business, leading to greater economic impact) (p. 734). It also should be acknowledged that the increased protection of soils and native vegetation will enhance nonmarket values including erosion control, decreased wildfire risk, and improved water quality.

It’s very encouraging to see management guidance common to all alternatives that focuses on Best Management Practices and other site-specific measures in order to “maintain soil stability, protect physical and biological (cryptogamic) soil crusts, and minimize wind erosion of soils (p. 177). This provides the foundation for conserving the NCA’s natural values and is also something that grazing is not compatible with.

Recreation and Visitor Services

Regarding outdoor recreation activities, our main focus is on how various zone designations and activities will impact the NCA’s ecological and wildlife resources. Overall, in comparing the zone descriptions, we support the lower emphasis on visitor use and developed recreation that is reflected in Alternative C, which contains the greatest Primitive Zone acreage. However, in the Primitive Zone, it is not clear how having it open to hiking anywhere will protect critical habitat for the desert tortoise over the life of the plan; designated trails may protect the tortoise better over the long term. The main concern we have is that these zoning measures may not be enough to handle potential negative pressures and effects of recreation, including increased commercial recreational use, on environmental resources. The monitoring of hiking, equestrian, and dispersed camping use in the Primitive Zone is very important given the serious impacts horses

can have on the arid, fragile soils and that this zone includes critical desert tortoise habitat. Such wide-ranging use over the life of the plan could easily lead to habitat degradation rather than recovery. We recommend that BLM work with partners to help with monitoring, and overall, we feel BLM should be more cautious in its planning because it is much harder to close areas later.

As noted in the opening section of this comment letter, it is unclear in the RMP how the BLM will manage recreation when it is conflicting with ecological and wildlife values. A clearly articulated “check” on recreation that documents the baseline use now is critical to future management and is vital to protecting the NCA over the life of the plan from what is certain to be ever-increasing recreational demand. Part of this effort requires a solid understanding of the effects of recreation on critical habitat. Development of a management structure that would allow the ability to balance recreation use with resource preservation in a justifiable and defensible plan that has clear direction for implementation is critical.

We specifically support Alternative C’s approach for Special Recreation Permits. As mentioned above, the increased use of commercial companies should be anticipated because there are an increased number of companies using the NCAs. In addition, we recommend careful assessment of commercial guiding numbers and areas visited, with adaptive management prescriptions to regulate such activities if they impact the environmental resources. We strongly support Alternative C’s prohibition of any competitive non-motorized events or organized group events. The NCA’s purpose does not mesh well with group activities, which can impair environmental resources as well as the visitor experience. There are other public and private lands and settings that can handle and are more appropriate for such activities.

Regarding the new climbing areas in Woodbury Road and Utah Hills area in Alternative B, the RMP did not include information about potential wildlife conflicts, especially bighorn sheep and cliff-nesting raptors. If there are such potential issues where climbers could disrupt critical wildlife activities, we recommend that BLM utilize seasonal closures upon implementation, with the same recommendation for existing climbing areas.

See the next section for specific comments on target shooting and paintball.

Target Shooting & Paintball

Although the RMP’s Alternative B restricts target shooting to the area outside of the desert tortoise critical habitat zone, there are too many impacts from recreational target shooting, including trigger trash left at target-shooting sites, dangerous conflicts for other recreationists and wildlife, and ignition of wildfires from exploding targets. Such issues related to target-shooting are increasing throughout our public lands. We urge the adoption of Alternative C’s prohibition of the discharge of firearms throughout the NCA except for licensed hunting. For target shooting, we would encourage a partnership with local communities and BLM to establish a site, possibly through a Recreation and Public Purchases lease of BLM land not within the NCA, that could be responsibly managed. In addition, it should be noted that the county already has an established target range near the county fairgrounds.

The RMP does not specifically discuss paintball activities. The BLM should explicitly prohibit paintball activities within the Beaver Dam Wash NCA because of the resource damage and aesthetic blight that inevitably results. There already is a designated 400-acre facility in Washington County to accommodate those who engage in paintball (and target shooting) located in Hurricane near the county fairgrounds.

Riparian Habitat

The NCA's riparian lands provide habitat for countless numbers of wildlife and vegetation species, and contribute to a rich biological diversity that is otherwise uncommon in these parts of the arid southwest. These lands provide biological corridors that are crucial priorities to protect in the management plans now, not waiting for another plan revision 20 years from now. BLM's Alternative B does not give enough protection to the riparian zone with a 500-foot setback. Therefore, we strongly support the specific management prescription in Alternative C that "prohibits new surface disturbing activities or projects within 1,000 feet of the edge of the riparian zone" except in cases when the activity would benefit the riparian zone (p. 189). This provides better long-term protection for nesting wildlife and more protection to the floodplain.

As mentioned above, the Beaver Dam Wash riparian zone should be protected from grazing. It is a classic desert drainage that experiences flash flood events as an instrumental part of its hydrology. The preservation of the floodplain and habitat adjacent to the stream corridor is essential to its natural functioning, and the 1,000 foot buffer will provide the strongest protection and development of healthy riparian vegetation, which is habitat for many wildlife species including various bat species and the Southwestern willow flycatcher and Western yellow-billed cuckoo, both special status species.

Also, in addition to the RMP's listed management actions for riparian vegetation conservation and protection (p. 68), we recommend that, based on the results of the riparian area inventory, BLM establish a phased plan that outlines specific actions and areas for riparian habitat recovery and/or protection.

Given the sensitive native fish species and overall rich diversity of plants and wildlife found within the Beaver Dam Wash riparian corridor, and its importance as a major tributary of the Virgin River watershed, we would like to see the strongest protection of the Wash's soil, vegetation, and water quality from grazing and ATV use. We strongly support the statement found on p. 101 to "restrict, modify, or eliminate any land uses and authorized activities that are shown to degrade aquatic habitat in the Beaver Dam Wash," (common to all alternatives) and would suggest, rather than first monitoring existing uses for their possible effects, as stated in the RMP, that the BLM inventory existing uses and, as part of the implementation of the RMP, restrict those that it knows contribute to degradation of water quality, riparian habitat, and stream bank stability.

Visual Resource Management, Right-of-Way Corridors

We support the revocation of the designated utility and transportation corridor through the NCA that follows the route of Old Highway 91. This will enhance the Old Spanish National Historic

Trail implementation by avoiding future visual impairments and other right-of-way-related disturbances along the historic trail. As noted in the RMP, Alternative C provides the opportunity for 4,962 acres of the historic trail corridor to be VRM Class I (p. 121).

And overall, given the importance of scenic values to the quality of life in Washington County, as highlighted in the Vision Dixie process, we support Alternative C's VRM classes. The Beaver Dam Wash NCA encompasses a spectacular landscape, one that deserves all the possible protection of its scenery for the benefit of current and future users.

Old Spanish National Historic Trail

We are excited about the designation of the Old Spanish National Historic Trail (OSNHT). It represents a unique amenity that will be attractive as a way of connecting cultural history to the wilder natural environment that exists in many parts of the Beaver Dam Wash NCA. For local residents and visitors alike, the OSNHT will enrich the human experience of the landscape.

IV. Red Cliffs NCA RMP

Our greatest concern with the Red Cliffs NCA RMP has already been covered separately within the Northern Transportation Route section of this comment letter.

Also, as indicated earlier in this letter, there are many challenges to protecting environmental and cultural resources in this NCA, which has become increasingly popular for recreation. Specific comments follow.

Recreation and Visitor Services

Regarding outdoor recreation activities, our comments for the Red Cliffs NCA are similar to those for the Beaver Dam Wash, with the added point that the Red Cliffs is the gateway for recreation demand given its proximity to the greater St. George area. Therefore, we strongly urge the development of management protocols within the RMP that provide the BLM with the ability to control recreation activities that start to impair ecological and wildlife values. This is particularly important with the majority of the Frontcountry Zone being within critical Mojave desert tortoise habitat.

Stricter guidelines are needed and should be in place to protect tortoise habitat in this planning cycle, rather than waiting 20 years for another plan revision. Alternative B does not give enough protection to tortoise habitat. We wonder how the various zone designations and activities will impact the NCA's ecological and wildlife resources. Overall, in comparing the zone descriptions, we support the lower emphasis on visitor use and developed recreation that is reflected in Alternative C. An important part of this alternative is the prohibition of campfires for those engaged in dispersed camping in the Primitive Zone. It is vital to establish management actions that minimize the risk of wildfire in areas proximal to critical desert tortoise habitat. However, the Primitive Zone's allowance for cross-country travel of equestrians and hikers will lead to impacts on soils, biological (cryptogamic) soil crusts, vegetation, and wildlife. These impacts

could be severe, especially from horses, resulting in multiple trails and damage that would be hard for the fragile desert landscape to recover from. Over the life of the plan, the effects of such wide-ranging use could be quite detrimental. Adding concrete prescriptions that weigh environmental effects and recreation should come into play, providing BLM with administrative direction to implement restrictions on recreation activities as needed. We also are concerned about the impact of dogs, and recommend that the BLM implement restrictions on dogs (e.g. prohibition of dogs, on-leash regulations) in areas requiring greater resource protection.

As noted in the opening section of this comment letter, it is unclear in the RMP how the BLM will manage recreation when it is conflicting with ecological and wildlife values. A clearly articulated “check” on recreation in the RMP is vital to protecting the NCA over the life of the plan from what is certain to be ever-increasing human impacts from recreation demand. There are already studies showing that some trails are causing severe problems, and illegal social trails are being established from bordering communities.⁶ One doesn’t have to be a scientist to know that 150,000 user-day visits in 2012 (RMP p.30) is going to impact tortoise habitat. In the past, we have heard of much higher numbers of people using the reserve. This is the opportunity to be more cautious about what is allowable in terms of human impacts.

We realize that this balancing act between the environmental and recreation values will be a focus of the travel management plan, which we eagerly await. However, looking at special status species, critical Shivwits milkvetch habitat occurs in the White Reef area, which, as the RMP notes, has numerous existing trails (p. 826). In addition to fencing and trail designation, the RMP should contain direction for restriction or closure of trails if the critical habitat is impaired by recreational use. Part of this effort requires a solid understanding of the effects of recreation on critical habitat.

We also specifically support Alternative C’s restriction on Special Recreation Permits, and would recommend limiting all commercial group permits to a size of 12, including guides, while allowing motor coach groups to reach a size of 15. As noted in the RMP, “guided hikes can become cumbersome and unpleasant for participants and other trail users when a group size exceeds 12” (p. 830). In addition, we recommend careful assessment of commercial guiding numbers and areas visited, with adaptive management prescriptions to regulate such activities if they impact environmental resources. We strongly support Alternative C’s prohibition of any competitive non-motorized events or organized group events. The NCA’s purpose does not mesh well with group activities, which can impair environmental resources as well as the visitor experience. There are other public and private lands and settings that can handle and are more appropriate for such activities.

We appreciate BLM’s challenge in managing both for resource quality and outdoor recreation opportunities. Regarding camping at the Sand Cove Primitive Camping Area, the compromise presented in Alternative B makes sense, continuing to allow camping but in a more prescribed manner with metal campfire containers and designated camp sites. This should reduce the existing sprawled out use of and related impacts to this area. Education and oversight will be necessary, so visitors understand why it’s important to pack out all human waste and are incentivized to do so.

⁶ Red Cliffs Desert Reserve Recreation Impact Monitoring Report 2014

With the Red Cliffs Campground, we support the continuation of the fee area for day use and camping but don't support the possibility of enlargement of the facilities ("e.g. increased parking, additional vault toilets, campsites" – p. 264). This area is already heavily visited and the effects are noticeable, including trash left along trails, the marking up of rock faces, and development of social trails. Rather than enlarge the facility, we encourage BLM to offer greater site stewardship and education regarding "leave no trace" principles for those who hike in the campground's surroundings.

Concerning the new climbing area proposed on Sandstone Mountain in Alternative B, the RMP did not include information about potential wildlife conflicts, especially cliff-nesting raptors. If there are cliff-nesting raptors, we recommend that BLM utilize seasonal closures upon implementation, with the same recommendation for existing climbing areas.

Riparian Habitat

We support Alternative C's protection of riparian resources, which "prohibits new surface disturbing activities or projects within 1,000 feet of the edge of the riparian zone" except in cases when the activity would benefit the riparian zone (p. 69). The Virgin River watershed is defined by a classic flash flood hydrologic regime. The preservation of the floodplain and habitat adjacent to stream corridors is essential to its natural functioning, and the 1,000-foot buffer will provide the strongest protection of the floodplain and healthy riparian vegetation, which is habitat for many wildlife species including the Southwestern willow flycatcher and yellow-billed cuckoo, both special status species.

Also, in addition to the RMP's listed management actions for riparian vegetation conservation and protection (p. 189), we recommend that, based on the results of the riparian area inventory, BLM establish a phased plan that outlines specific actions and areas for riparian habitat recovery and/or protection. Such plans should include prioritizing the habitat needs of special status species – for example, for the Virgin River the Utah Department of Wildlife Resources takes the approach of establishing riparian restoration with a combination of some areas of open water and others with dense stands of vegetation as needed by the Southwest willow flycatcher.

Given the BLM sensitive native fish species and overall rich diversity of plants and wildlife found within the Virgin River and its tributaries in the NCA (Quail Creek and Leeds Creek), we would like to see the strongest protection of the river's soil, vegetation, and water quality. We strongly support the statement found on p. 222 to "restrict, modify, or eliminate any land uses and authorized activities that are shown to degrade aquatic habitat in the Virgin River," (common to all alternatives) and suggest, rather than first monitoring existing uses for their possible effects, that the BLM inventory existing uses and, as part of the implementation of the RMP, restrict those that it knows contribute to degradation of water quality, riparian habitat, and stream bank stability.

Visual Resource Management & Right-of-Way Corridors

We support Alternative C's revocation of the designated utility corridor along I-15 (133 acres) in order to prevent soil loss, erosion, and compaction from the possible construction and maintenance of linear ROWs. As noted in the RMP (p. 766), the soils in this area are fragile and gypsum rich, and avoiding their disturbance will minimize entry of saline soils into the Virgin River via Quail and Leeds creeks.

In the Vision Dixie process, residents wanted the scenic landscapes protected, and, based on the language in the OPLMA, scenic values should be protected. BLM lands include a unique blend of geologic landforms that create a wealth of varying landscapes, open vistas, and spectacular scenery that is recognized in national and international sectors: "Viewing scenery is ranked as the number one pursuit of all visitors to public lands."⁷ The scenery is viewed by every sightseeing tourist on I-15 and by area residents. The existing BLM designations for Visual Resource Management (VRM) are not adequate, and therefore, we support Alternative C to assure protection of the world-class scenery of the landscapes and viewsheds within the NCA.

V. ACEC Designations

Washington County is located in a unique area at the nexus of three ecoregions: the Colorado Plateau, Great Basin Desert, and Mojave Desert. According to the Washington County Habitat Conservation Plan, "The County contains habitat for eleven species which are listed as threatened or endangered pursuant to the Endangered Species Act of 1973. Conflicts have arisen between growth and development of particular areas in the County...."⁸ There are over 49 Candidate Species for Federal listing and many others are State sensitive.⁹ And according to the HCP, Washington County has the highest density of unique species in the state.

With so many species in peril, the BLM's designation in the Preferred Alternative B of only 4,716 acres for ACEC habitat protection for plants does not preserve the best habitat for these at-risk species. Therefore we strongly support the ACEC designations in Alternative C.

More specifically, BLM's Preferred Alternative B does not fulfill the mandate in Section 1979 (a) (1) and (2) of OPLMA, that directs BLM, to "identify areas located in the County where biological conservation is a priority; and undertake activities to conserve and restore plant and animal species and natural communities within such areas." BLM's inclusion of just three new ACECs for plant protection leaves many rich biological areas in the county unprotected. Since these arid lands are becoming drier, we shouldn't pass up an opportunity to protect BLM's river parcels – the land that includes the Virgin and Santa Clara rivers and North Creek, and their riparian zones and floodplains, which provide habitat to many special status species identified in the Virgin River Recovery Plan. Our data is included in our previous scoping comments for ACEC nominations that can be found on our website.

⁷ BLM RMP draft 1989, p. 89

⁸ Habitat Conservation Plan, Washington County. Utah, Washington County Commission Dec 1995, page 1

⁹ Habitat Conservation Plan, Washington County. Utah, Washington County Commission Dec 1995, page 16

Alternative C's ACEC nominations do satisfy the legislative mandate from OPLMA. It is critical for BLM to take steps now to protect their riparian zone and floodplain lands from grazing and not wait another 15 or 20 years for another planning cycle. These river habitat ecosystems will provide the real opportunity for recovery of at-risk species. These parcels are some of the last parcels of BLM land outside of the NCAs that have surface water going across them, and they need a higher level of protection than is afforded them in the 1999 RMP.

In particular, we support:

1. The inclusion of CDF's nomination of the Zion Scenic Corridor along scenic Highway 9 as an ACEC from the top of the La Verkin Twist to Zion National Park (total area is 52,268 acres; BLM acreage is 34,322) (Map is in our scoping comments) providing protection for scenic vistas, biological, historical and cultural resources, soils, watershed values, and recreational, educational, and economic opportunities. This important area provides significant views of the spectacular mesas and cliffs of BLM land and the remarkable Virgin River as it rushes out of Zion Canyon and North Creek. The river sustains significant habitat for many important species found in the area and contains a myriad relics from prehistoric and historic settlers. For over 30 years residents have tried to preserve BLM land above the Hurricane Cliffs for its wildlife, its recreational opportunities, its scenic views, and to protect the watershed that provides drinking water for St. George. The stretch of the Virgin River going east to the park boundary is the most pristine for the sensitive fish species in the county. A smart growth concept would keep urban development below the Hurricane Cliffs and not up canyon where development will continuously be exposed to flash flooding.
2. Grafton, 44 acres. There is an opportunity to join with other private landowners to provide a large area to protect the Virgin River and its floodplain property. Currently, landowners, and state and federal agencies are working to protect 175 acres of land in Rockville, and this parcel could be added to this effort.
3. Mosquito Cove, 88 acres. This parcel could be combined with Grafton Heritage Partnership Project's to protect the Virgin River and its wildlife habitat along with #2, above.

BLM reduced the acreage for some the nominations in Alternative C, which doesn't protect the floodplain areas:

1. Moody Wash, BLM recommends only 24 acres, and we strongly support 14,974 acres to protect the uplands. If the uplands were more protected and restored, this would help reduce flooding downstream into the Santa Clara River.
2. Santa Clara Baker, BLM recommends only 32 acres, and we support 116 acres in our nomination.
3. Santa Clara Veyo, BLM recommends only 16 acres, and we recommend 399 acres in our CDF's nomination.
4. Shinob Kibe, BLM recommends 70 acres and we can support that amount.
5. Virgin River, BLM recommends 245 acres, and we support 2,198 acres in our nomination.

VI. Other SGFO RMP Amendment Comments

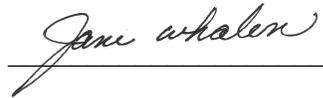
Bull Valley Mountains Multi-Species Management Area

We support Alternative C, which provides the best protection of this area, including from linear and site-type right of ways, fluid mineral leasing, and mineral material sales.

Comprehensive Travel and Transportation Management

The concerns we have raised in this letter about resource protection in relation to recreation will also apply, perhaps even more directly, to the pending Travel Management Plan (TMP) and its proposal for trail designations, locations, and allowed uses. Realizing how important this plan is in determining on-the-ground activities and potential impacts, we look forward to providing specific comments once the TMP draft is released, and other public participation opportunities.

Respectfully,



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