

Glen Canyon NRA
Off-Road Vehicle Management Plan/Environmental Impact Statement
Alternatives Scoping Brochure
Concern Response Report

Report Date: 02/08/2011

AE 24000 - Affected Environment: Wilderness

Concern ID: 27340

**CONCERN
STATEMENT:**

Several commenters suggested that a baseline analysis of Wilderness areas inside the NRA be conducted, and that Wilderness areas (potential and designated) should be protected from vehicle use.

Representative Quote(s): **Corr. ID:** 136 **Organization:** SUWA

Comment ID: 172657 **Organization Type:** Unaffiliated Individual

Representative Quote: I am a SUWA member and an ATV owner. There is plenty of opportunity for ATV use in southern Utah as it is. All potential wilderness should be protected from this form of recreation.

Oh and be the way, draining the Powell impoundment of the Colorado river would eventually bring back one of the greatest wild river/wilderness areas in the world.

Corr. ID: 225 **Organization:** suwa. welc, Wild Earth Guardians....

Comment ID: 173525 **Organization Type:** Unaffiliated Individual

Representative Quote: Much of the area is of wilderness quality. Some has been so recommended by NPS I am told. It is particularly important to preserve the wilderness character of those areas for hopeful inclusion as officially protected wilderness as well as preserving a wilderness experience there. ORV access in or close to those areas must not be allowed to prevent degradation of those areas.

Corr. ID: 329 **Organization:** *Not Specified*

Comment ID: 174777 **Organization Type:** Unaffiliated Individual

Representative Quote: The Glen Canyon National Recreation Area was designated to preserve the scenic, scientific, and historic features contributing to the public enjoyment of the area. ORV use, ANY ORV use, is none of these. Having kayaked Lake Powell and hiked in the GCNRA, I have seen first-hand the destruction wrought by ORVs. The alternatives presented do not sufficiently protect the undeveloped lands, wilderness qualities, and quiet experience. ORV use should be severely curtailed. Allowing ORVs on ALL dirt roads is irresponsible. Any plan which does not severely limit ORV use could be easily found to be an abuse of discretion on the part of the agency, as it so clearly does not preserve the scenic, scientific, and historic features contributing to the public enjoyment of the area.

Corr. ID: 542 **Organization:** Southern Utah Wilderness Alliance

Comment ID: 176107 **Organization Type:** Conservation/Preservation

Representative Quote: Comment: NPS must complete a wilderness inventory for the two areas (approximately 13,000 acres) that were initially identified as "deletions" on Map I of the Glen Canyon NRA General Management Plan (the "deletion" areas are in the Purple Hill area and the Beef Basin area) as these areas have never been inventoried for wilderness suitability. In addition, NPS must conduct a wilderness inventory the shoreline areas that have emerged as the water level of the lake has decreased, if these areas have not previously been

inventoried for wilderness suitability. If found suitable for wilderness. NPS must protect the wilderness values in these areas and prohibit ORV and other motor vehicle use in these areas.

AE 25000 - Affected Environment: Water Quality

Concern ID: 27341

CONCERN STATEMENT: One commenter suggested conducting an analysis of impacts to water quality from ORV usage in watersheds.

Representative Quote(s): **Corr. ID:** 523 **Organization:** National Parks Conservation Association

Comment ID: 175307 **Organization Type:** Unaffiliated Individual

Representative Quote: We strongly encourage "on-the-ground" analysis of resources issues including impacts to water quality from ORV use in watersheds.

AE 9050 - Affected Environment: Invasive Species

Concern ID: 27344

CONCERN STATEMENT: Commenters suggested that keeping areas open to ORV use helps prevent the spread on invasive species.

Representative Quote(s): **Corr. ID:** 494 **Organization:** *Not Specified*

Comment ID: 175077 **Organization Type:** Unaffiliated Individual

Representative Quote: The beach areas that are currently open should remain open. These beaches are exposed then covered with water level fluctuations.

OHVs probably benefit those areas by preventing the establishment of invasive species like tamarisk that change the environment and waste the water.

Corr. ID: 495 **Organization:** UT/AZ ATV club Canyon Country 4x4 Jeep

Comment ID: 175081 **Organization Type:** Recreational Groups

Representative Quote: Back to Alt C -- Keeping Lone Rock Beach area open will keep those unwanted tamarisk trees at bay.

AE13000 - Affected Environment: Cultural Resources

Concern ID: 27345

CONCERN STATEMENT: One commenter suggested that the NRA should limit ORV access to areas containing cultural resources, so as to prevent vandalism.

Representative Quote(s): **Corr. ID:** 523 **Organization:** National Parks Conservation Association

Comment ID: 175306 **Organization Type:** Unaffiliated Individual

Representative Quote: Looting and vandalism of cultural resource sites is a major problem of adjacent BLM lands. Especially with lowering reservoir levels, it is important that GCNRA limit access to areas containing cultural resources or adjacent to culturally rich areas such as Cedar Mesa.

AE19000 - Affected Environment: Other Agencies? Land Use Plans

Concern ID: 27346

CONCERN STATEMENT: Several commenters suggested that the ORV routes should be consistent with the land use plans of surrounding communities and agencies, including Grand Staircase-Escalante National Monument, Capitol Reef, and Canyonlands National Park, and that ORV routes should not lead to these areas.

Representative Quote(s): **Corr. ID:** 252 **Organization:** *Not Specified*

Comment ID: 173956 **Organization Type:** Unaffiliated Individual

Representative Quote: In addition, some of the routes NPS proposes for ATV and other motor vehicle use in the GCNRA lead to trails closed to public and/or ATV use in the Grand Staircase-Escalante National Monument, in Canyonlands National Park, and to lands proposed for wilderness. These routes should not be available for ATV use

Corr. ID: 418 **Organization:** *Not Specified*

Comment ID: 175728 **Organization Type:** Unaffiliated Individual

Representative Quote: ORVs have no legitimate place in the GCNRA because of the damage that they would do to the natural and wilderness values of this region. They bring noise pollution, air pollution, and terrain damage and for these reasons are prohibited or severely restricted in other national parks and monuments in the region (Canyonlands and Capitol Reef and Grand Staircase-Escalante). Lake Powell is already accessible by the GCNRA road system; hence off-road access is not even necessary.

Corr. ID: 503 **Organization:** Kanab City Council

Comment ID: 176146 **Organization Type:** Town or City Government

Representative Quote: We suggest that the Glen Canyon National Recreation Area not make its management planning decisions in a vacuum. Rather, such decisions should be made within the context of adjacent public lands management agency decisions relating to ORV use. This is especially important due to decisions by the Escalante-Grand Staircase National Monument, the Bureau of Land Management and the U.S. Forest Services to limit access by ORVs. This need to take the recreation decisions of sister public lands managers into account is addressed in The Federal Executive Branch Policy Governing the Selection, Establishment and Administration of National Recreation Areas when it states, that National Recreation Areas "provide for Federal investment in outdoor recreation that is more clearly responsive to recreation demand than other investments that are based primarily upon considerations of preserving unique natural or historical resources, the need to develop and conserve public lands and forests, or the requirements of major water resource development undertakings." This statement validates the extreme value of existing ORV areas and roads in the national recreation area, especially in light of past and proposed closures by other public land manager.

Corr. ID: 506 **Organization:** The Wilderness Society

Comment ID: 175139 **Organization Type:** Conservation/Preservation

Representative Quote: This particular letter will be limited to recommendations regarding the coordination of management for the Grand Staircase-Escalante National Monument (GSENM) in particular...we strongly urge the Park Service to not designate ORV routes that are adjacent to monument in any of the alternatives developed.

Corr. ID: 516 **Organization:** Office of the Governor, State of Utah

Comment ID: 175212 **Organization Type:** State Government

Representative Quote: Consistency with state and local travel management plans and regulatory structures should be maintained in the Glen Canyon National Recreation Area's (GCNRA) General Management Plan (GMP). The use of definitions and data sets that are unique to the GMP will cause confusion during the analysis, and ultimately hinder implementation of the Park Service's final plan. Two areas of consistency, definitional and jurisdictional, are presented by the information presented to this point.

Corr. ID: 516 **Organization:** Office of the Governor, State of Utah

Comment ID: 175215 **Organization Type:** State Government

Representative Quote: First, off-highway vehicles are defined in Utah Code Section 41-22-2 as "any snowmobile, all-terrain type I vehicle, all-terrain type II vehicle or motorcycle." An all-terrain type I vehicle is further defined in UC Section 41-22-(3) (a). Utah statute allows off-highway vehicles to be operated on public lands that are designated by map or description as open to off-highway vehicle use by the controlling federal, state, county or municipal agency. The information presented in the scoping documents, in contrast, defines ATV as "(a) class of vehicles that are primarily designed for off-road travel, including all-terrain vehicles, utility vehicles, and off-road dirt or trail bikes." This proposed language creates a dual regime of vehicle classification, which, in turn, creates ambiguity and confusion. This will create and present problems for the proposed plan's purposes. In addition, the proposed language does not distinguish between motorized, partially motorized, and non-motorized vehicles.

Second, GCNRA is bordered by several Bureau of Land Management Districts, and many, if not most, of the roads in GCNRA are extensions of roads in these districts. The roads within these districts are managed in accordance with each district's Resource Management Plan(RMP) and associated Travel Plan. The proposed alternatives are not yet sufficient in number or scope to accommodate consistency with the federal management prescriptions for the roads that extend into the GCNRA from these districts. The various counties maintain the roads identified in the scoping material as county roads, and the state and the counties jointly own the right-of-way for the roads, pursuant to R.S. 2477, as recorded in the offices of the various county recorders. In addition, county adopted travel maps include several roads not currently included in the scoping information.

Corr. ID: 518 **Organization:** *Not Specified*

Comment ID: 175353 **Organization Type:** Unaffiliated Individual

Representative Quote: Several inter-agency (NPS/BLM) roadless areas are affected by this plan, including Dark Canyon, Fiddler Butte, Nokai Dome, Fifty Mile Mountain, Burning Hills, and Colt Mesa. BLM found those areas to have wilderness character. Alternatives A, D, and E call for letting ATVs drive on dirt and gravel roads within GCNRA near those roadless areas. The problem is that ATV riders like to drive off the road and into the back country if they think they won't get caught. Roads adjoining those roadless areas should be off-limits to A1;Vs, so you won't be promoting ORV damage there. Your environmental analysis should consider the potential impacts of ORVs on their wilderness character.

Corr. ID: 525 **Organization:** *Not Specified*

Comment ID: 175332 **Organization Type:** Unaffiliated Individual

Representative Quote: ATVs and dirt bikes should be strictly prohibited within Glen Canyon National Recreation Area. ORV riders already have 20,000 miles of approved routes on BLM public lands in southern Utah. That fact should be considered in your draft plan.

Corr. ID: 531 **Organization:** *Not Specified*

Comment ID: 175991 **Organization Type:** Unaffiliated Individual

Representative Quote: Riders should comply with any state age requirements on route and trails. It's not the NPS job to regulate off major roads.

Corr. ID: 533 **Organization:** *Not Specified*

Comment ID: 176018 **Organization Type:** Unaffiliated Individual

Representative Quote: Paiute ATV system in central Utah has large area that works well and is signed very well. Consider this area as a model for Glen Canyon.

Corr. ID: 533 **Organization:** *Not Specified*

Comment ID: 176032 **Organization Type:** Unaffiliated Individual

Representative Quote: Model the UT State Parks Volunteer trail patrol program (Dale Bartholomew - UT State Parks; Brian Carter - Richfield Office USFS; Fred Hayes - State Parks in Salt Lake City).

25. See Paiute ATV system in central Utah.

Concern ID: 27403

**CONCERN
STATEMENT:**

One commenter stated that the proper consultation has not occurred with Garfield County, and that there are no proposed alternatives that are consistent with Garfield County's Transportation Plan, OHV Ordinance, and/or Resource Management Plan.

Representative Quote(s): **Corr. ID:** 502 **Organization:** Garfield County

Comment ID: 175310 **Organization Type:** County Government

Representative Quote: 1. Garfield County is a cooperating agency. However, the County has been entirely excluded from the planning process. It is our understanding that NEPA dictates cooperating agencies should be brought into the process at the earliest possible date and should be consistently involved. This has not occurred in the development of the ORV plan. 2. As we read the law, NEPA requires that Federal Agencies coordinate their planning efforts with Local Government. Furthermore, it is our understanding that Federal plans are to be consistent with local plans, to the maximum extent allowed by law. The scoping document fails to identify any alternatives that are consistent with Garfield County's Transportation Plan, OHV Ordinance, and/or Resource Management Plan. The document completely ignores Garfield County's Recreation Opportunity Spectrum analysis which incorporates elements of Scenery Management and Recreation Management from Forest Service, BLM and Park Service units in the County. The document completely ignores Garfield County's role as a land managing entity and as the highway authority over roads the NRA purports to manage.

Concern ID: 27405

**CONCERN
STATEMENT:**

The Kane County Board of Commissioners states that they are invoking and exercising its "coordination authority" under the Federal Land Policy Management Act, the National Environmental Policy Act, Council of Environmental Quality and other applicable federal regulations, Kane County also proposes the ORV Management Plan be consistent with the America's Great Outdoor Initiative. Kane County also requests a face-to-face

meeting to discuss the scope of the County's coordinating authority, its role in this planning process, and the resulting management actions.

Representative Quote(s): Corr. ID: 517

Organization: Kane County Commission

Comment ID: 175471 **Organization Type:** County Government

Representative Quote: Coordination with Kane County, consistency with local planning, and consideration of County valid existing rights within the NRA

On July 11 , 2007 the Kane County Board of Commissioners submitted a letter of acceptance as a cooperating agency in this planning process. To date, the County has not participated as a cooperating agency. Whether the lack of participation was through a lack of invitation or through a lack of response, the County commits to assume its role as a cooperating agency from this point forward.

In an effort to avoid any confusion in this regard, this letter is submitted in order to clarify that the County is invoking and exercising its "coordination authority" under the Federal Land Policy Management Act (FLPMA), the National Environmental Policy Act (NEPA), Council of Environmental Quality (CEQ) and other applicable federal regulations.

NEPA and the CEQs require consideration of inconsistencies with local planning and states, "the statement [planning document] should describe the extent to which the agency would reconcile its proposed plan with the plan [in this instance, the Kane County General Plan (KCGP)] or law."

NEPA and the CEQs state (Section 1500.6 Agency authority) "Agencies shall review their policies, procedures, and regulations accordingly and revise them as necessary to insure full compliance with the purposes and provisions of the Act [NEPA]. The phrase 'to the fullest extent possible' in section 102 means that each agency of the Federal Government shall comply with that section unless existing law applicable to the agency's operations expressly prohibits or makes compliance impossible."

Corr. ID: 517

Organization: Kane County Commission

Comment ID: 175551 **Organization Type:** County Government

Representative Quote: 5. The agency should respect limits on its jurisdiction

The GCNRA Scoping Brochure, under "Management Considerations," page 4 states:

- "Roads within the recreation area would be designated and posted with road numbers as part of Glen Canyon's road numbering system."

As we noted in Section D of these comments, the agency should respect limits on its jurisdiction. Just as it lacks authority to plan on Tribal and private lands, it has a basic legislative mandate to acknowledge and protect valid existing rights, including rights of ways under the jurisdiction of the State and local governments. This statement should be modified to read:
- Roads within the recreation area that are under the NPS jurisdiction would be designated and posted with road numbers as part of Glen Canyon's road numbering system.

Corr. ID: 517

Organization: Kane County Commission

Comment ID: 175447 **Organization Type:** County Government

Representative Quote: The GCNRA should consider that outdoor recreation, motorized vehicle based recreation, including ATV's/UTV's has

grown in popularity over the last several decades. Additionally, the Administration has released the America's Great Outdoor Initiative which acknowledges the increasing importance of outdoor recreation. Given the legislative mandate to provide for recreation and the administration's desire to facilitate outdoor recreation, the County encourages multiple alternatives that enhance recreational access to the lands adjacent to Lake Powell as required within the enabling legislation. The GCNRA should consider the remoteness and ruggedness of the lands adjacent to Lake Powell, and the benefits of allowing motorized vehicles to access remote locations within the GCNRA.

Corr. ID: 517 **Organization:** Kane County Commission

Comment ID: 175480 **Organization Type:** County Government

Representative Quote: The County requests a face-to-face meeting to discuss the scope of the County's coordinating authority, its role in this planning process and the resulting management actions. The County believes that coordination authority includes more authority than simply being involved in general planning. The County believes that coordination authority includes management actions that are put into place to implement plans, and it includes development of rules and regulations and decisions which affect the jurisdiction of the County regarding the local tax base, economic interests, and the protection of the rights of its citizens, including property.

The Kane County General Plan (KCGP) serves as the County's local land use plan related to federally managed lands within the County. The KCGP defines the local custom, culture and economic stability, including the tax base. The congressional requirements granting coordination authority to the County derives from the Tenth Amendment responsibility for local government to provide for public health and safety. The federal requirements elevate local government over the general public and local government participation over public participation. The County understands that coordination authority carries responsibilities for which the County is prepared to assume.

The County believes that the federal planning actions and regulations should be consistent with the KCGP or federal managers should reasonably explain why it is illegal or unreasonable for management actions to not be consistent with local planning. This process will take a significant commitment for the County and the federal planners to stay engaged to be most effective.

Corr. ID: 517 **Organization:** Kane County Commission

Comment ID: 175492 **Organization Type:** County Government

Representative Quote: The draft alternatives appear to assume federal ownership of all roads within the planning area. This assumption may be inconsistent with federal statutory law, as well as planning coordination and consistency with local planning requirements.

The U.S. Congress granted to the County and the State of Utah rights-of-way to construct public highways across the planning area prior to the reservation of the lands. See Revised Statute 2477. Congress further protected R.S. 2477 grants as valid existing rights in 1976. FLPMA Section 509(a), under "existing rights" states, "Nothing in this title shall have the effect of terminating any right-of-way or right-of-use heretofore issued, granted, or permitted." FLPMA Section 701(a) states "Nothing in this Act, or in any amendment made by this Act, shall be construed as terminating any valid

lease, permit, patent, right-of-way, or other land use right or authorization existing on the date of approval of this act." Significantly, in Section 701(h) FLPMA states "All actions by the Secretary concerned under this Act shall be subject to valid existing rights ." In other words, FLPMA requires that all actions by the GCNRA, in this planning effort, shall be subject to, and consistent with, the County's established rights granted under R.S.2477.

The KCGP states, "Kane County will take the lead in providing a safe, efficient and functional transportation system which emphasizes the circulation of residents and visitors between communities, as well as to the scenic wonders found in the county. The system will stress a wide range of transportation methods, and will be founded upon the ability of the county to utilize rights of way on public lands asserted under authority of Revised Statute 2477."

AE2000 - Affected Environment: Soils

Concern ID: 27347

CONCERN STATEMENT: Commenters stated that the soils in the NRA are susceptible to erosion, and that ORVs exacerbate that problem.

Representative Quote(s): **Corr. ID:** 325 **Organization:** *Not Specified*

Comment ID: 174753 **Organization Type:** Unaffiliated Individual

Representative Quote: Deserts are very fragile. As a hiker, I am aware that we are not to walk on the cryptobiotic soil as it takes so long to build up this important ecological cog in the delicate ecosystem of the desert. What could someone who drives these machines over the ground care? And it wouldn't be just trails dedicated to ORV use that would be ruined; it would be anyplace that drivers would dare go.

Corr. ID: 344 **Organization:** *Not Specified*

Comment ID: 174931 **Organization Type:** Unaffiliated Individual

Representative Quote: We live in an area that has been turned into a dust bowl by OHV abuse. I am part of an over 60 hiking group that hikes several times a week and see the daily damage done by dirt bikes, jeeps, and four wheelers even in areas that are off limits to OHV use. The BLM lacks the resources (and will?) to enforce closed areas. Although 90% of our county is "open space" you can not walk more than a mile in any direction without encountering a road or OHV use. The result is widespread erosion and intentional destruction of soil crust. Please do not let this happen in the Glen Canyon Recreational Area!

Corr. ID: 487 **Organization:** *Not Specified*

Comment ID: 175044 **Organization Type:** Unaffiliated Individual

Representative Quote: Been coming to LR Beach since 1976. The hills there are so depleted from runs from the ORV's it has caused many mud slides during heavy rains. I remember October 6, 2006. 6.5 inches of rain. The mud was 3 to 4 feet deep at the restrooms. All dues to ORV's.

AE21000 - Affected Environment: Socioeconomics

Concern ID: 27348

CONCERN STATEMENT: One commenter stated that alternatives C and E are unfair to individuals who do not own watercrafts.

Representative Quote(s): **Corr. ID:** 104 **Organization:** *Not Specified*
Comment ID: 172156 **Organization Type:** Unaffiliated Individual
Representative Quote: Alternatives C and E have a disparate effect on lower income citizens that do not have boats and those who prefer human powered boating. Shoreline access is too restricted, leaving the lake only to those with boats. Street legal ATVs can be an irritation, but it is personal conduct and nothing about the vehicles. Properly operated, the vehicles provide legitimate access to GMP roads that present a higher risk of damage to conventional vehicles.

AE22000 - Affected Environment: Visitor Use

Concern ID: 27349
CONCERN STATEMENT: [One commenter stated that ORVs and ORV trails are used by a variety of different user groups, which should be taken into account during this planning process.](#)
Representative Quote(s): **Corr. ID:** 14 **Organization:** Capital Trail Vehicle Association
Comment ID: 175903 **Organization Type:** Unaffiliated Individual
Representative Quote: We feel that we are representative of the needs of the majority of public land visitors who may recreate and not be organized with a collective voice to comment on their needs during the public input process. These independent multiple-use recreationists include visitors who use motorized routes for weekend drives, mountain biking, sightseeing, exploring, picnicking, hiking, ranching, rock climbing, skiing, camping, hunting, RVs, shooting targets, timber harvesting, fishing, viewing wildlife, snowmobiling, accessing patented mining claims, and collecting firewood, natural foods, rocks, etc. Mountain bikers seem to prefer OHV trails because we clear and maintain them and they have a desirable surface for biking. Multiple-use visitors also include physically challenged visitors who must use wheeled vehicles to visit public lands. All of these multiple-use visitors use roads and motorized trails for their recreational purposes and the decision must take into account motorized designations serve many recreation activities, not just recreational trail riding. We have observed that 97% of the visitors to this area are there to enjoy motorized access and motorized recreation.

AE26000 - Affected Environment: Solitude

Concern ID: 27350
CONCERN STATEMENT: [One commenter stated that ORVs have impacted the ability to enjoy solitude within the NRA, while another commenter expressed concern regarding the level of access ORVs are afforded.](#)
Representative Quote(s): **Corr. ID:** 239 **Organization:** *Not Specified*
Comment ID: 175209 **Organization Type:** Unaffiliated Individual
Representative Quote: The noise, the endless noise. The destruction, the pollution. OTV's are one of the biggest threats to our wilderness. PLEASE help protect our wilderness from further OTV damage.

Our wilderness, forests. and public lands are under threat from so many angles. They desperately need to be protected.
Our parks and forests are supposed to be a place of peace and quiet, for us

and for the animals who live there.

PLEASE let our public lands stay as beautiful and peaceful as Mother Nature intended!!

Corr. ID: 482 **Organization:** *Not Specified*

Comment ID: 175030 **Organization Type:** Unaffiliated Individual

Representative Quote: 2. Your photo on Page Five of the mud flats along the northwest edge of Glen Canyon NRA on the Warm Creek Road accurately portrays what is happening now and will only be exacerbated over the years as the ORVs become more familiar with this area and this road. While conventional vehicles realistically had to stop at the Little Valley Line Camp (also called Wild Horse Ranch), ORVs now go out onto Grand Neck Bench, and well beyond the 4WD TRAIL shown on the Sit Down Bench 7.5 series USGS map and to the top of Rock Creek. I have not been to Rock Creek for several years, but I assume that in time, the ORVs will get down the old road into Rock Creek itself, if they haven't already. I have recently seen ORV tracks quite away down Little Valley.

AE7000 - Affected Environment: Air Quality

Concern ID: 27351

**CONCERN
STATEMENT:**

Commenters suggested that there are detrimental effects caused by ORV use in the NRA, and that the Clean Air Act requires that NPS not license, permit, approve, engage in, or support in any way an activity that will not conform with a state implementation plan.

Representative Quote(s): **Corr. ID:** 175 **Organization:** *Not Specified*

Comment ID: 172447 **Organization Type:** Unaffiliated Individual

Representative Quote: I am a semi-frequent visitor to Southern Utah. I enjoy the scenery, the hiking, the photography and the overall experience.

One of the few disappointments is the noise and stink during active ORV episodes and the scenery disturbing tracks, litter and landscape scars left after the episodes.

I would encourage you to ban ALL off-road motorized vehicles on public land.

Corr. ID: 248 **Organization:** *Not Specified*

Comment ID: 173862 **Organization Type:** Unaffiliated Individual

Representative Quote: The impact ORV have on dust should also be considered. Dust has been shown to be affecting the snowpack in UT and CO (possibly larger areas too). Snowpack is vital to waterways and ecosystems beyond the GCNRA.

Corr. ID: 542 **Organization:** Southern Utah Wilderness Alliance

Comment ID: 176121 **Organization Type:** Conservation/Preservation

Representative Quote: ORV use has the potential to negatively impact a variety of resources, including increasing fugitive dust and degrading air quality; damaging soils and vegetation and increasing the threat of non-native, invasive plant species; fragmenting wildlife habitat; damaging riparian areas, and floodplains; causing irreparable harm to cultural resources; significantly impacting opportunities for solitude and wilderness experiences in the backcountry and in areas NPS has recommended for wilderness designation.

Corr. ID: 542 **Organization:** Southern Utah Wilderness Alliance

Comment ID: 176129 **Organization Type:** Conservation/Preservation
Representative Quote: In addition, the Clean Air Act requires that NPS not license, permit, approve, engage in, or support in any way an activity that will not conform with a state implementation plan. (Footnote: State implementation plans are developed in order to achieve National Ambient Air Quality Standards (NAAQS) and observe Prevention of Significant Deterioration (PSD) increment limits. See id. § 7410; see, e.g., Utah Admin. Code R307-110-9 (implementing PSD increment limits in Utah's state implementation plan). Compliance with a state implementation plan includes eliminating violations of NAAQS and ensuring that activities NPS approves do not "cause or contribute to any new violation of any standard in any area." See 42 U.S.C. § 7506(c)(1). NPS is therefore obligated under the Clean Air Act to ensure that any activity it approves will not violate air quality standards such as NAAQS and PSD increment limits.) 42 U.S.C. § 7506(c)(1). In order to ensure that federal and state air quality standards in the Glen Canyon NRA will be met, NPS must provide the results of dispersion modeling to confirm that conclusion. NPS cannot know whether it is satisfying its obligation to observe air quality standards without modeling the effect that the routes designations and ORV activities proposed in the ORV Management Plan will have on ambient concentrations of various pollutants. (Footnote: Both the State and Federal standards are based on ambient concentrations of various air pollutants.) Without preparing modeling to determine what the ambient concentrations of relevant pollutants will be, NPS cannot know the impacts of these pollutants on humans, wildlife, vegetation, water bodies, or the climate.

AL 4090 - Oppose all ORVs in backcountry/ Wilderness

Concern ID: 27353

CONCERN

STATEMENT:

Representative Quote(s):

Several commenters stated opposition to any vehicular access into wilderness (potential and designated) or backcountry areas.

Corr. ID: 27

Organization: *Not Specified*

Comment ID: 174983 **Organization Type:** Unaffiliated Individual

Representative Quote: Mass access to the backcountry equals mass destruction, vandalism and will require more money to maintain. No ATVs!

Corr. ID: 115

Organization: *Not Specified*

Comment ID: 172178 **Organization Type:** Unaffiliated Individual

Representative Quote: Also, please protect the lands recommended for wilderness designation and the irreplaceable cultural resources of the GCNRA from the impacts of off-road vehicle use.

Corr. ID: 141

Organization: UUWA

Comment ID: 172290 **Organization Type:** Unaffiliated Individual

Representative Quote: In the age of mechanization, there is little left for preservation of wilderness. Put "back country" in perspective of 100+ years. Opening areas to mechanized travel WILL create a loss of "pristine." Little enough is left. Keep mechanization out!

Corr. ID: 155

Organization: *Not Specified*

Comment ID: 172343 **Organization Type:** Unaffiliated Individual

Representative Quote: Please restrict ORV use to only designated areas in indisputably non-wilderness-value lands. I feel the BLM currently allows far too much ORV access to many of these areas and fails to adequately police

some of the other already-restricted areas. ORV areas are fine as long as they are minimal and well-enforced, but some motorized scofflaws can cause way too much damage and spoil the value of some areas for the rest of us.

Corr. ID: 166 **Organization:** *Not Specified*

Comment ID: 172381 **Organization Type:** Unaffiliated Individual

Representative Quote: GCNRA was designated to ". . . preserve the scenic, scientific, and historic features contributing to the public enjoyment of the area . . ." in addition to providing for the recreational use and enjoyment of Lake Powell and the adjacent lands. Not all forms of recreation should be provided for in lands administered by the NPS. For instance, alpine ski resorts and organized sports are generally not acceptable in units of the NPS because this form of recreation is deemed inappropriate for lands that are required to be protected for their scenic and scientific values. Off-road ATV use is no different--it is simply an inappropriate recreational activity in a protected landscape due to the irreparable damage they cause.

Please include an alternative that prohibits all use of off-road ATV use in GCNRA.

Corr. ID: 351 **Organization:** Maryland Ornithological Society

Comment ID: 176055 **Organization Type:** Unaffiliated Individual

Representative Quote: Protect Roadless Areas

Some of the greatest wildlife values of GCNRA are in the roadless areas that cover more than 80 percent of its acreage. In 1980 the National Park Service recommended 588,855 acres, or 47 percent of GCNRA, for designation as wilderness. Several roadless areas in GCNRA are contiguous to roadless areas identified by the Bureau of Land Management as having wilderness character. Certain BLM areas have been proposed for wilderness status in America's Red Rock Wilderness Act (ARRWA, introduced as H.R. 1925 in the 111th Congress), a bill co-sponsored by three Maryland legislators among more than 180 nationwide. The wilderness values of these roadless areas could be compromised by illegal riding of ATVs.

Corr. ID: 405 **Organization:** Rockingham County High School Environmental Club

Comment ID: 175626 **Organization Type:** Unaffiliated Individual

Representative Quote: I have personally been in many of the areas that make up the backcountry of the Glen Canyon Recreation Area. I have never seen such unique beauty. The backcountry needs total protection. We cannot allow unwanted ORV use destroy critical habitat belonging to many endangered species. We need to preserve the maximum amount of area in its current pristine condition.

Corr. ID: 410 **Organization:** *Not Specified*

Comment ID: 175708 **Organization Type:** Unaffiliated Individual

Representative Quote: Many people come for the solitude, and to fish, hike, and camp. Motorized traffic creates noise impacts. When limited to the existing road system, road noise is expected and can be planned for. In the backcountry and along the shoreline, the solitude will be lost by the introduction of ATV/ORVs. The machines, particularly dirt bikes and custom machines, create an excessive noise factor. The cumulative consequences of heavy ATV use would create a noise impact that would simply be unacceptable to many visitors. I, personally, cannot enjoy bird watching and natural history study when confronted by the din of ATVs and other ORVs.

AL 5000 - Oppose all ATVs

Concern ID: 27354

CONCERN STATEMENT: Several commenters stated opposition to allowing ATVs to operate in the NRA.

Representative Quote(s): **Corr. ID:** 30 **Organization:** *Not Specified*

Comment ID: 175000 **Organization Type:** Unaffiliated Individual

Representative Quote: If you currently look at what the ATV community is doing to this park - it is unacceptable. The park is turning into a dump. Trash every where.

Allowing any of the 4-wheel / ATV community close to any of the beaches or water of Glenn Canyon will also risk become another unsightly place to visit.

The 4-wheel and ATV community continues to take off stock mufflers and significantly increase the sound of their vehicles which travels loudly across the water.

Give the boaters some privacy and quality time. Give the 4-wheel /ATV a place to go where they can be cleaned up after.

Corr. ID: 126 **Organization:** *Not Specified*

Comment ID: 172437 **Organization Type:** Unaffiliated Individual

Representative Quote: No ATVs and no new roads. A thorough analysis of impacts to all wildlife is needed.

Corr. ID: 134 **Organization:** *Not Specified*

Comment ID: 172626 **Organization Type:** Unaffiliated Individual

Representative Quote: I have not read the actual draft of the proposal but I do not feel that ATV's belong in a National Park. People can hike, ride regular bikes or dirt bikes as long as the bikers stay on the designated roads and do not take side trips into the wild plant life and have complete respect for others on the trail and do not scare or otherwise impact the wild life in these parks. Allowing ATV's inside National Parks is defeating the purpose of the National Park System to preserve this area of wilderness in a pristine condition for wild life, plant life and for current and future generations of people around the world to enjoy.

Corr. ID: 145 **Organization:** n/a

Comment ID: 172316 **Organization Type:** Unaffiliated Individual

Representative Quote: My main concern re: ATVs in Glen Canyon NRA is that this policy is far looser than for nearby national parks under the jurisdiction of NPS. Glen Canyon NRA is replete with scenic wonders, sensitive to inappropriate uses. Any option that allows them in the NRA is, in my opinion, inappropriate. I am acquainted with the NRA - having explored, camped, and hiked in it, and I strongly believe ATVs have no place in any management scheme for this area.

Corr. ID: 351 **Organization:** Maryland Ornithological Society

Comment ID: 176054 **Organization Type:** Unaffiliated Individual

Representative Quote: Before 2008 the 300 miles of unpaved roads within GCNRA were closed to ATVs. These roads were used by visitors in conventional vehicles, including cars and SUVs with or without four-wheel drive. (On rough sections of these roads, such as parts of the historic Hole-in-the-Rock Road, NPS recommends using 4WD vehicles.) In 2008 a

change in Utah state law created a category of "street-legal ATVs," and GCNRA managers believed they had no choice but to allow these street-legal ATVs on the roads, except in the back-country zone of the northern panhandle. One of the issues in the forthcoming ORV plan is whether to restore the ban on all or some roads. We support a new regulation to ban ATVs from unpaved GCNRA roads, especially those bordering on wildlife habitat areas and lands that are candidates for designation as wilderness.

Corr. ID: 546 **Organization:** *Not Specified*

Comment ID: 176065 **Organization Type:** Unaffiliated Individual

Representative Quote: It is regrettable that a change in Utah state laws in 2008 had the effect of opening unpaved Glen Canyon park roads to "street-legal" ATVs. Your new plan should reverse that. It is vital to keep ATVs off the park roads where they border on NPS or BLM roadless areas, because ATV riders are given to leaving the roads and traveling cross-country. Our friends have seen ATV tracks miles away from any road.

AL 5005 - Oppose all ORVs in park

Concern ID: 27355

CONCERN STATEMENT: [Several commenters stated opposition to allowing any ORVs operate within the NRA.](#)

Representative Quote(s): **Corr. ID:** 130 **Organization:** The Public Writ Large

Comment ID: 172612 **Organization Type:** Unaffiliated Individual

Representative Quote: I am a former land manager. ORV's have their place, on an oval track or on existing roadways that are open to use and used by licensed motor vehicles. They have no place on our public lands other than those mentioned above. I can hike and not disturb others with the sounds of my soles on the earth, ORV's cannot.

Corr. ID: 149 **Organization:** Sierra Club

Comment ID: 172339 **Organization Type:** Unaffiliated Individual

Representative Quote: No Motor Powered Vehicles. This is needed to sustainably appreciate the park in it's full grandeur. Motor vehicles cause permanent ecological damage and dramatically reduce the quality of experience.

Corr. ID: 409 **Organization:** Friend of Glen Canyon

Comment ID: 175703 **Organization Type:** Unaffiliated Individual

Representative Quote: There is no need for GCNRA to provide ORV access. Lake Powell reservoir is very accessible via the GCNRA road system, and is surrounded by millions of acres of lands administered by the Bureau of Land Management, most of which are open to ORV use.

Corr. ID: 426 **Organization:** Glen Canyon Institute

Comment ID: 175768 **Organization Type:** Unaffiliated Individual

Representative Quote: The GCNRA EIS should either ban ORV access altogether, or greatly reduce access from current levels.

Corr. ID: 426 **Organization:** Glen Canyon Institute

Comment ID: 175766 **Organization Type:** Unaffiliated Individual

Representative Quote: There is no need for GCNRA to provide ORV access. Lake Powell reservoir is very accessible via the GCNRA road system, and is surrounded by millions of acres of lands administered by the Bureau of Land Management, most of which are open to ORV use.

Corr. ID: 455 **Organization:** Explore Publishing, Inc.

Comment ID: 175835 **Organization Type:** Unaffiliated Individual

Representative Quote: Under several acts of congress and other legal mandates, The National Park Service is chartered to safeguard the Glen Canyon National Recreation Area from adverse environmental impacts, including ORV use. I have visited Glen Canyon National Recreation Area several times and feel strongly that ORV use should be completely eliminated, or at the very least scaled sharply back from present usage.

This is a fragile area whose unique physical and historic resources should be protected to the greatest degree possible. Appropriate public access is already available through its well developed road system and should not allow additional off-road intrusions that create noise, dust, and damage that mars the scenery and leads to erosion.

Lake Powell is surrounded by literally millions of acres under BLM mandate that are open to ORVs. There is no need to expose Lake Powell to the same degradation. Other national parks and monuments either prohibit or greatly restrict ORV access. Lake Powell/Glenn Canyon should receive the same protection.

Corr. ID: 473 **Organization:** SUWA

Comment ID: 175887 **Organization Type:** Unaffiliated Individual

Representative Quote: Habitat damage in the vast majority of the Colorado Plateau is long lasting, and ORV use is probably the most disruptive recreational activity that takes place on public lands. As such, policies that regulate ORV use on public lands (particularly those lands that have, or may have, wilderness character, or those lands that have natural or cultural resources that should be protected) should err on the side of caution. The assumption should be that ORV use would have negative impact on the land, and therefore the burden should be on ORV users to prove no impact before allowing access.

That should include assurances that unauthorized access to all protected/prohibited areas will be prevented (ideally) or punished (at the least). If neither is possible (e.g. lack of enforcement manpower, etc.), then ORV use should be prohibited more widely as an unmanageable activity.

AL 5010 - Support ORV use

Concern ID: 27356

CONCERN STATEMENT: [Several commenters were in favor of allowing ORV use within the NRA.](#)

STATEMENT:

Representative Quote(s): **Corr. ID:** 14 **Organization:** Capital Trail Vehicle Association

Comment ID: 175905 **Organization Type:** Unaffiliated Individual

Representative Quote: The Glen Canyon ORV Travel Management Plan project area with its current level of motorized access and recreation is where hundreds of thousands of residents from the surrounding regions go to enjoy motorized recreation. The project area is where we go and what we do to create those memories of fun times with family and friends. Management of these lands for multiple-uses including reasonable motorized use allows the greatest enjoyment of these lands by the widest cross-section of the public to continue. These lands are designated as multiple-use lands. We ask that management of these lands for multiple-use be selected as the preferred alternative.

Corr. ID: 14 **Organization:** Capital Trail Vehicle Association
Comment ID: 175909 **Organization Type:** Unaffiliated Individual
Representative Quote: In the end, we are simply asking that this action; (1) reverse the trend of closing us out of the forest, and (2) provide for the continued responsible use of roads and trails that we have used for decades so that we might enjoy a form of recreation that is important to us. The availability of adequate multiple-use access and recreational opportunities is especially important in these troubled times. We encourage the agency staff to come forward with a plan that addresses the needs of OHV users so that we can come out of the travel planning process with workable solutions to OHV issues. We respectfully ask that the agency represent our needs by using all of our comments and information to justify a reasonable and equitable increase of motorized access and motorized recreational opportunities in the project area and to counter any opposition to those opportunities.

Corr. ID: 14 **Organization:** Capital Trail Vehicle Association
Comment ID: 175906 **Organization Type:** Unaffiliated Individual
Representative Quote: Our comments document that the current management trend towards massive motorized closures (25 to 75% of the existing routes) is not responsible to the public's needs for motorized access and recreation and is contrary to the multiple-use management directives specified by congress. The agency can no longer ignore that motorized access and recreation are the largest (over 50 million) and fastest growing group of visitors. The agency can no longer ignore the needs of motorized recreationists and act irresponsibly by continuing to close a large percentage of existing motorized access and recreation opportunities. The agency can no longer ignore the need for new motorized recreational opportunities. The agency can no longer ignore the significant cumulative effect that all of the motorized closures over the past 30 years have had on motorized recreationists.

Corr. ID: 14 **Organization:** Capital Trail Vehicle Association
Comment ID: 175904 **Organization Type:** Unaffiliated Individual
Representative Quote: Many federal actions have led to the continual closure of motorized recreational opportunities and access and at the same time the number of OHV recreationists has grown to 50 million. Multiple uses of the forest are marginalized every time a forest plan or travel management plan comes up for action. The motorized closure trend has created significant cumulative effects and has reached the point where it is causing severe public distress. Reasonable alternatives to motorized closures must be pursued. The continual loss of motorized recreational opportunities is our primary concern. Because of the significant cumulative effect of motorized closures at this point in time, we feel strongly that there can be "no net loss" of motorized recreational opportunities with the Glen Canyon ORV Travel Management Plan project.

Corr. ID: 19 **Organization:** *Not Specified*
Comment ID: 174941 **Organization Type:** Unaffiliated Individual
Representative Quote: Given the legislative mandate to provide for recreation and the administration's desire to facilitate outdoor recreation, I request that the agency develop at least one Alternative that does not limit ORV use, and one Alternative that enhances recreational access to the GCNRA.

Corr. ID: 41 **Organization:** Blue Ribbon Coalition
Comment ID: 175189 **Organization Type:** Unaffiliated Individual
Representative Quote: Given the legislative mandate to provide for

recreation and the administration's desire to facilitate outdoor recreation, I request that the agency develop at least one Alternative that does not limit ORV use, and one Alternative that enhances recreational access to the GCNRA.

Corr. ID: 70 **Organization:** *Not Specified*

Comment ID: 175391 **Organization Type:** Unaffiliated Individual

Representative Quote: I find it incredulous you're considering closing Stanton, Lone Rock Beach and Farley/White. These are MAJOR camping areas and the fact that you'd even be considering this indicates how far removed from reality you are. Remember this is a RECREATION area, NOT a National Park.

AL 5020 - Oppose new roads/ORV areas

Concern ID: 27357

CONCERN STATEMENT: One commenter suggested that no new roads or ORV areas be opened within the NRA under this plan, stating that the ORV areas that are currently established are adequate.

Representative Quote(s): **Corr. ID:** 185 **Organization:** *Not Specified*

Comment ID: 175394 **Organization Type:** Unaffiliated Individual

Representative Quote: I am Italian and visit the southwest likely every year. I am fond of the plateau area and I was hit by the landscape since the first time that I began to study its geology. We always drive a 4WD because it is the only way to get into it, but we rigorously stay on the designated roads. Every time we drive through and among the red rocks always we pray no more roads are to be open to public. They are enough for the preservation of such unique place in the world.

We also know very well the GCNRA that after the building of the Dam contributes with Lake Powell the public enjoyment of the area. But the Lake covers only a small part of the area and we should absolutely consider the remaining huge part of undeveloped lands, containing pre-historic cultural sites, wildlife habitat, and outstanding opportunities for a pure wilderness experience. And these lands must be protected from ORV impacts.

AL 5030 - Support new roads/ORV areas

Concern ID: 27358

CONCERN STATEMENT: Several commenters stated that additional areas should be open to ORV use, while some commenters provided specific routes/roads that should be open to ORV use within the NRA.

Representative Quote(s): **Corr. ID:** 5 **Organization:** Dunes and Trails ATV Club

Comment ID: 174708 **Organization Type:** Unaffiliated Individual

Representative Quote: You should explore opening more off road area, trails and roads to off hwy vehicle travel, both licensed and unlicensed. The National Recreation areas if for recreation and access by OHV and ATV is wholesome and correct recreation for the National recreation area.

Corr. ID: 5 **Organization:** Dunes and Trails ATV Club

Comment ID: 174709 **Organization Type:** Unaffiliated Individual

Representative Quote: Open more area to ATV and off hwy travel

The National recreation area belongs to the people, all the people equally. We need more area open for exploring by OHV and ATV

Corr. ID: 114 **Organization:** BlueRibbon Coalition

Comment ID: 175273 **Organization Type:** Unaffiliated Individual

Representative Quote: Outdoor recreation, including motorized vehicle based recreation, has grown in popularity, social value and economic importance over the last several decades. Moreover, the Administration has recently instituted several initiatives, such as the America's Great Outdoor Initiative, which acknowledges the increasing importance of outdoor recreation. Given the legislative mandate to provide for recreation and the administration's desire to facilitate outdoor recreation, we encourage the agency to develop at least one Alternative that enhances recreational access to the GCNRA. Currently, the agency has formulated only alternatives that reduce the opportunity for motorized vehicle-base-recreation.

Corr. ID: 287 **Organization:** *Not Specified*

Comment ID: 174763 **Organization Type:** Unaffiliated Individual

Representative Quote: With the increase use of ORV and ATV we need more not less area's to ride. It is obvious from the sales that the public has a desire to use them and should be allowed on public lands especially in recreational area's

The is no alternative that increases the use of ORV and ATV opportunities. There needs to be an alternative that is for recreation.

Corr. ID: 289 **Organization:** *Not Specified*

Comment ID: 174901 **Organization Type:** Unaffiliated Individual

Representative Quote: My friends and myself has reached the 60 threw 90 years of age, because of this, its a lot harder to hike in to the back country we used to. If you keep closing back roads to four while drive vehicles. we are no longer able to get in the back country that we have care far most of our lives. Only the young who can walk and hike will be able to use it. I have all ways been told that this country is for all of us, not the few that hike. More roads need to be open, not closed.

Corr. ID: 457 **Organization:** tri state ATV club

Comment ID: 175839 **Organization Type:** Unaffiliated Individual

Representative Quote: I feel this plan, especially alternative a, is a good starting point but should be expanded to allow more ATV access in Glen Canyon NRA. More and more visitors to Glen Canyon have ATVs and would like to use them to explore and see the area with their friends and family. As part of an aging population, I can testify that hiking vast areas (carrying enough water to survive in the desert) is NOT an option for me anymore. (I am 70). Your visitors are your customers. Please design options that meet their needs and desires while still protecting the resource. That can be done by planning for routes that provide access without destroying anything. I am certain there are plenty of roads, two tracks and the like already existing throughout the NRA that could be used to provide recreational opportunities for ATVs.

Corr. ID: 464 **Organization:** *Not Specified*

Comment ID: 175860 **Organization Type:** Unaffiliated Individual

Representative Quote: I find it interesting that one (1) proposal retains the status quo while the remaining four (4) proposals all include some type of restriction from the status quo, with one scenario completely eliminating all ORV access. There are no proposals that would expand access to any type of motorized access. This means that the best case scenario for someone who enjoys ORV activities is a 20% chance that things will not change while

there is an 80% chance that motorized access will be restricted in some manner. This has been a consistent experience in that I am constantly finding accessibility being restricted, never expanded. I find this trend disturbing. Surely, within the 1.25 million acres (granted some of this is water) there is at least one possible area of expansion.

Corr. ID: 503 **Organization:** Kanab City Council

Comment ID: 176143 **Organization Type:** Town or City Government

Representative Quote: We believe the proposed management plan and environmental impact statement errs in not including an alternative that provides new ORV options at Glen Canyon National Recreation Areas. We feel that, at a minimum, no roads should be closed to ORV use and no ORV area should be closed without plans for new ORV use in an alternative location. We understand that such areas could not be opened until appropriate studies have been conducted, but we believe that contingent plans should be included in this plan. We believe that, even if the Glen Canyon National Recreation area lacks resources for such new development at this time, the plan should reflect potential future activities. Failure to do so will inhibit the ability to develop new world-class recreation areas when new resources are available or if funding partners can be identified. By not including an alternative supporting this option, Glen Canyon National Recreation Area has not fulfilled its obligation to offer a full range of alternatives.

Corr. ID: 530 **Organization:** *Not Specified*

Comment ID: 175941 **Organization Type:** Unaffiliated Individual

Representative Quote: 1. Two roads at Lee's Ferry need to be addressed as they provide access to hiking on Shinarump Bench - road to old corral and road past boneyard. These roads are also used by sheep hunters.

2. Road from Greenhaven to Lone Rock Road was closed and should be opened.

3. Bullfrog North and South should be opened.

4. Make the sewer easement from Greenhaven to Lone Rock an ORV route.

5. Crosby Canyon should be open all the way to the water.

6. Recreation area should have more access and more trails.

7. There are additional roads in Crosby Canyon that should be opened.

17. Transformer Road was closed post 9/11 and then a bypass road was created to get to former roads. Powerline access roads/Dead Dog Road needs to be a legal access.

18. US 89 corridor is an important access to GLCA, with the network of spur roads.

19. Motorized users of the 89 corridor are an important constituency for NPS to consider.

Corr. ID: 545 **Organization:** *Not Specified*

Comment ID: 176062 **Organization Type:** Unaffiliated Individual

Representative Quote: I am respectfully requesting your consideration in the planning process as follows:

- Please Allow access for ATVs the same as for "Jeeps"/pickup-trucks in the Orange Cliffs area on dirt roads/trails. (ATVs from my perspective have even less environmental impact than vehicles weighing much more--with lower tire pressure, less dust and no more noise than the larger vehicles).

- Plans should ensure the same ATV access as noted above in the remainder of the Recreation Area on dirt roads

Your consideration of these requests will be greatly appreciated in the

interest of both fairness and preserving our public lands for all to see and enjoy.

AL 5040 - Support ORV Accessible Shorelines

Concern ID: 27359

CONCERN STATEMENT: Several commenters provided support for maintaining or expanding ORV accessible shorelines.

Representative Quote(s): **Corr. ID:** 16 **Organization:** *Not Specified*

Comment ID: 174937 **Organization Type:** Unaffiliated Individual

Representative Quote: Lake Powell is a small part of Glen Canyon NRA-13% of its 1.25 million acres. I have enjoyed exploring the lake by houseboat, ski boat, kayak and Jeep. The boating is great but my favorite times have been exploring those few, rare shoreline access points by Jeep. Some of those places are an adventure to reach, with the reward of a beautiful blue lake surrounded by red rock. The more difficult the access, the greater the solitude. Please don't close any of them. Though they may only get occasional use, those of us who do go there cherish the recreational opportunities they provide.

Corr. ID: 23 **Organization:** UT4WD

Comment ID: 174977 **Organization Type:** Unaffiliated Individual

Representative Quote: A group of us went out to explore Crosby Canyon a week ago with jeeps and an ATV, and we were stopped by a sign at the high water mark. It would have been easy to miss the sign since it was set off the road about 500-1000 ft in the tamarisk. My concern is that the park develops a plan that allows shoreline access to the points of entry that can make it down to the lake.

I would like to see the shoreline access points left open in the new management plan because I see a great benefit to being able to explore the roads around the lake and camp by the water. In the near future I'm hoping to drive in one of the roads in the San Juan River arm or Red Canyon and meet my Dad who will be there in his boat. It's keeping opportunities like these available that allows for multiple use of the resource.

Corr. ID: 89 **Organization:** Lake Powell Yacht Club

Comment ID: 171899 **Organization Type:** Unaffiliated Individual

Representative Quote: Please do not close the dirt road access points inside the park boundaries... many rely on them for their recreation! Please continue to allow access through dirt and secondary roads to the park!

Corr. ID: 454 **Organization:** SPEAR (Sanjuan Public Entry and Access Rights)

Comment ID: 175833 **Organization Type:** Unaffiliated Individual

Representative Quote: We believe that ORV access along shoreline areas should be left open. They serve a good use and often will be under water. The raising and lowering shore line will reduce the impacts.

Corr. ID: 463 **Organization:** Utah 4 Wheel Drive Association

Comment ID: 175850 **Organization Type:** Unaffiliated Individual

Representative Quote: 12 ORV accessible shoreline areas on Lake Powell

We ask that all 12 ORV accessible areas remain open to motorized vehicles. Further, we ask that the policies be clarified and made consistent throughout

the GCNRA. What is the definition of shoreline access? My understanding is that shoreline access is defined as ending at the high pool shoreline. That places the actual end of motorized access as well away from the water when the lake is less than full, as has been the situation for some years. Shoreline access that stops far short of the actual shoreline is meaningless.

U4WDA requests that the proposed shoreline access management policies be included in the proposed alternatives

Corr. ID: 505 **Organization:** *Not Specified*

Comment ID: 176098 **Organization Type:** Unaffiliated Individual

Representative Quote: SHORELINE ACCESS IN GENERAL:

The Glen Canyon NRA (GCNRA) contains around 2,000 miles of shoreline along Lake Powell, most of which is accessible by the boating public. On the other hand, only a handful of relatively small and strictly defined shoreline areas are accessible to motor vehicles by the non-boating public. Closing any of these shoreline access areas would be a serious detriment to the enjoyment of GCNRA by the nonboating, motorized public. Alternative A is the only alternative that addresses this concern. Please DO NOT CLOSE any of the shoreline access areas and their respective camping areas to motor vehicle use. If there are scientific or observed concerns with over-use, abuse, or environmental impact; I strongly believe that the management consideration already stated in the ORV Plan (page 4) will mitigate most such concerns. It states, "All designated ORV areas would be designated and posted with appropriate signage that includes use rules and regulations." This would be especially important for the Lone Rock Beach area. In other words, education and enforcement are more appropriate methods to dealing with motor vehicle concerns than simply denying access.

Corr. ID: 509 **Organization:** *Not Specified*

Comment ID: 175383 **Organization Type:** Unaffiliated Individual

Representative Quote: One of the long-standing situations limiting the general public's use of GCNRA/Lake Powell has been the lack of access to the Lake. It is advertised that Lake Powell has 2000 miles of shoreline, but there are only a handful of access points (four marinas and a few jeep roads). I believe Lone Rock and Stanton Creek may be the only access points available to the general public without a boat (for access from the marinas) or a four-wheel drive vehicle (for access on the very few jeep roads). One of the authorizing purposes of the Colorado River Storage Project (CRSP) and the GCNRA is the recreational enjoyment of the public. To further limit public access to the Lake and the recreation area seems counter to the authorized recreational purpose of the CRSP and GCNRA, and I encourage you not to do so. I seriously doubt that any of the proposed alternatives will be to expand (or provide additional) public access to the Lake and the GCNRA.

Corr. ID: 526 **Organization:** San Juan County Commission

Comment ID: 176043 **Organization Type:** Unaffiliated Individual

Representative Quote: We believe that all 12 ORV accessible shoreline areas should remain open to vehicular use. Very little of the shoreline of Lake Powell is accessible by vehicle so it is very important to keep these areas open and thereby allow for camping, fishing and possible small boat launching. We understand that Piute Farms is not one of the recognized accessible shorelines since it was originally considered as a marina. Now that there is no marina, it may make sense to designate it as an accessible shoreline.

AL 5060 - Recognize RS 2477ROWs

Concern ID: 27360

CONCERN STATEMENT: Several commenters asked the NPS to recognize the importance of R.S. 2477 Rights of Way, with many commenters stating that the NPS lacks jurisdiction over these roads.

Representative Quote(s): **Corr. ID:** 41 **Organization:** Blue Ribbon Coalition

Comment ID: 175192 **Organization Type:** Unaffiliated Individual

Representative Quote: Just as the agency lacks jurisdiction to plan for Tribal or private lands, its jurisdiction over certain roads on the NRA is similarly limited. As a citizen, valid existing rights of way granted via R.S. 2477 are important to me. The agency must not ignore State and local government authority over roads existing in the NRA.

Corr. ID: 60 **Organization:** self

Comment ID: 175352 **Organization Type:** Unaffiliated Individual

Representative Quote: As a citizen, valid existing rights of way granted via R.S. 2477 are important to me. The agency must not ignore State and local government authority over roads existing in the NRA.

Corr. ID: 463 **Organization:** Utah 4 Wheel Drive Association

Comment ID: 175849 **Organization Type:** Unaffiliated Individual

Representative Quote: The Rincon Road

We believe that the inclusion of this road should be in the scope of this management plan as it concerns OHV use in the GCNRA. This route that connects the Hole in the Rock trail to Lake Powell should be made a designated route by GCNRA. This historic and obviously machine constructed road would provide a valuable recreational opportunity. This route is highly supported by U4WDA and other user groups. GCNRA should also consider San Juan County's RS2477 right-of-way on this road. U4WDA requests that the agency include an alternative that includes designating the Rincon Road as open to motorized vehicles.

Corr. ID: 479 **Organization:** ExpeditionUtah.com

Comment ID: 175899 **Organization Type:** Unaffiliated Individual

Representative Quote: Outdoor recreation, particularly motorized vehicle based recreation, has grown in popularity over the last several decades and we feel it is neither responsible nor practical to funnel a growing segment of users into a shrinking population of trail opportunities. As citizens, valid existing rights of way granted via R.S. 2477 are extremely important to our member. We ask that the NPS continue to work with local counties to resolve these R.S. 2477 contested routes and honor the historic access rights of the citizens. The agency must not ignore State and local government authority over roads existing in the NRA.

Corr. ID: 517 **Organization:** Kane County Commission

Comment ID: 175494 **Organization Type:** County Government

Representative Quote: The County hereby submits a formal request to properly and adequately consider R.S. 2477 rights-of-way as required by NEPA and FLPMA in this planning effort. In addition to the legal status of valid existing rights this planning effort should properly consider the County's established highways as a requirement of coordination and consistency with local government planning.

The GCNRA may lack the authority to issue conflicting regulations over

R.S. 2477 rights-of-way. The GCNRA and the County share a split estate relationship regarding R.S. 2477 rights-of-way across the recreation area and must mutually respect the rights of the other in actions upon or adjacent to county highways. This planning effort should consider the need for cooperation in such instances.

The planning actions are required to be consistent with county transportation plans to the maximum extent allowable under federal law. And the planning decision should expressly declare and implement planning conditions in such a way that they will not hamper or interfere with the County's R.S. 2477 rights-of-way.

Corr. ID: 526 **Organization:** San Juan County Commission

Comment ID: 176041 **Organization Type:** Unaffiliated Individual

Representative Quote: The County has asserted an RS2477 claim for most if not all qualifying roads in the NRA within the county and feels strongly that ORV/ATV use should be allowed on all unpaved roads within the NRA. Most of these roads are shown on your GIS data base depicting General Management Plan approved roads. Some of the omitted roads include the Rincon Road and road networks in Bull and Imperial Valleys, Good Hope Bay and Muley Point areas. These roads provide riding and sightseeing as well as camping opportunities. We will send a data file for all those roads which should be included as roads approved for ORV I A TV use in the plan.

AL 5080 - Better manage ORV use

Concern ID: 27361

**CONCERN
STATEMENT:**

Many commenters stated that the NPS should improve management of ORVs inside the NRA, such as: providing improved enforcement and punishing violators, drafting new ORV use guidelines, establishing speed limits, providing improved signage, and educating users more effectively.

Representative Quote(s): **Corr. ID:** 4 **Organization:** *Not Specified*

Comment ID: 174701 **Organization Type:** Unaffiliated Individual

Representative Quote: Responsible OHV use has minimal impact on the land, and as such the efforts of the NPS should focus on enforcing existing laws that will weed out and punish those that illegally and irresponsibly use their OHVs.

Do not punish the responsible for the actions of the few "bad apples" out there. That type of profiling and stereotyping isn't honest. We won't punish all of Islam because a few radical members of that group are terrorists...and it's wrong to punish all OHV users because a few members of that group are irresponsible. Existing laws must be enforced/revised such that responsible Americans can use THEIR public land, and the actions of the non-compliant minority won't affect all Americans.

Corr. ID: 11 **Organization:** *Not Specified*

Comment ID: 174824 **Organization Type:** Unaffiliated Individual

Representative Quote: Developing a NPS guidelines for shoreline protection. The distance vehicles can access shorelines should be consistent. No driving along shorelines.

Corr. ID: 11 **Organization:** *Not Specified*

Comment ID: 174825 **Organization Type:** Unaffiliated Individual

Representative Quote: Noise has got to be addressed. Speed limits and perhaps a permit that could be revoked when these are disregarded could be implemented.

It's very important to permit access while balancing impact to those who wish to have a quiet, natural experience.

Corr. ID: 37 **Organization:** American Legion Post 24

Comment ID: 175151 **Organization Type:** Unaffiliated Individual

Representative Quote: Take enforcement action on those that can not follow the rules, instead of closing public land to the public in a manner that is restrictive to those that have mobility issues.

Corr. ID: 45 **Organization:** *Not Specified*

Comment ID: 175223 **Organization Type:** Unaffiliated Individual

Representative Quote: How about better management of the area under consideration? Generally, lack of information is the problem. Maps, kiosks and trail signing go a very long way in keeping OHV users on the trail.

Corr. ID: 69 **Organization:** Tri-State ATV Club

Comment ID: 175389 **Organization Type:** Unaffiliated Individual

Representative Quote: Signage will be a most valuable asset to the recreational area. Please look at the Paiute ATV and the Freemont ATV systems, using these as the pattern will better help you to set up your recreational plan as well as managing it.

Another useful tool would be to contact Utah State Parks and get their trail patrol plan and implement it in your recreational plan as well.

Corr. ID: 86 **Organization:** *Not Specified*

Comment ID: 171922 **Organization Type:** Unaffiliated Individual

Representative Quote: The privilege of riding our ATVs is something my husband and I take seriously and hope the NPS will continue to allow responsible persons to enjoy the terrain of the GCNRA. Increased patrols using "Volunteer Trail Patrollers" with the authority to enforce regulations or report offenders should be explored and tried out. Closing trails to responsible riders is not the answer, better education is.

Corr. ID: 103 **Organization:** Backyards of America

Comment ID: 172148 **Organization Type:** Unaffiliated Individual

Representative Quote: I have been riding some sort of off road vehicle for the last 40 years. From California, Arizona to Utah. While it's true that some will abuse the rules where ever or whatever, it is the majority of us who enjoy this form of recreation and sight seeing that appreciates and respects the landscape. Instead of closing areas down perhaps we can have more signs put up to designate responsible riding in areas of concern. Please keep these areas open for off road vehicle use, it is an opportunity to those of us to experience country sides not easily visited by regular vehicles.

Corr. ID: 163 **Organization:** *Not Specified*

Comment ID: 172374 **Organization Type:** Unaffiliated Individual

Representative Quote: Criteria should include enforceability.. How can rangers know in real time that a rule is being broken. Plans that ban ATV's from a road entirely are easy to enforce: The officer turns onto the road and goes toward its dead end. He can see everything that is on the road from start to finish. Seeing an ATV on the road means a violation, and can be ticketed at once.

But those rules that require that ATV's merely stay on approved trails and out of sensitive areas are hard to enforce. There may be many illegal tracks of ATV's discovered in a sensitive or off-limits area, but the officer would have to be there at the moment to witness the activity before writing tickets. Even if he sees a large group of ATV's returning on a road that accesses an ATV-trashed area, he cannot prove that they did it.

Existing alternative C seems to have easiest enforceability.

Corr. ID: 222 **Organization:** SUWA

Comment ID: 173502 **Organization Type:** Unaffiliated Individual

Representative Quote: Already used and maintained roads are mostly fine for ORVs, but when the road ends, what restrictions are present and how are they enforced? This need to be considered also as a small fraction of the ORV community seems to think there are no boundaries on their activities.

Corr. ID: 410 **Organization:** *Not Specified*

Comment ID: 175709 **Organization Type:** Unaffiliated Individual

Representative Quote: It is my belief that the option chosen by the agency must not grant motorized recreationists off road access, and should limit the use of ATVs/ORVs to existing unpaved roads in appropriate areas, and in reasonable numbers. Active monitoring of ATV/ORV damage and adequate enforcement should be part of the management plan.

Corr. ID: 416 **Organization:** Wasatch Mountain Club

Comment ID: 175724 **Organization Type:** Unaffiliated Individual

Representative Quote: Clear signage and widely available maps of terrain designated for ORV use that outlines prohibited areas.

Corr. ID: 416 **Organization:** Wasatch Mountain Club

Comment ID: 175725 **Organization Type:** Unaffiliated Individual

Representative Quote: Enforcement must be increased in prohibited areas.

Please limit ORV use strategically, especially near the shore of the lake.

Corr. ID: 452 **Organization:** *Not Specified*

Comment ID: 175827 **Organization Type:** Unaffiliated Individual

Representative Quote: People that complain about the damage to the land by irresponsible individuals operating OHV's that do not obey the law do have a legitimate complaint, the people that abuse the land should be stopped and prosecuted, but so should the people that backpack, rock or mountain climb that leave trash in the back country where OHV's can't get to. Instead of denying the rights of Americans to access public lands, hold the violators responsible for there actions, this SHOULD be a responsibility of the outdoor communities both the OHV users and non motorized users to police there own with the help, if needed, by law enforcement.

Corr. ID: 520 **Organization:** *Not Specified*

Comment ID: 176088 **Organization Type:** Unaffiliated Individual

Representative Quote: The Park needs to develop a road maintenance plan that assures that GMP roads are open and accessible for the types of vehicles for which they were designed. (For instance, the Grand Bench Road, an identified GMP road, is frequently not passable to even ORV of highly modified design.) The Park needs to assure that this road is accessible to conventional 4 x 4's as a minimum standard.

Corr. ID: 529 **Organization:** *Not Specified*

Comment ID: 175939 **Organization Type:** Unaffiliated Individual

Representative Quote: So, I favor enhanced enforcement of the access rules you already have in place. That is, make the fines for violations of the

rules extreme enough and public enough that travelers will respect the rules. I realize you probably do not have adequate manpower to patrol these remote areas. But, you can enlist responsible travelers in these areas to report time, date, license numbers, and violations by people who have no regard for the rules. Posting signs showing the fines and offering modest rewards might give irresponsible users second thoughts about ignoring the rules if they realized everyone was watching, not just park rangers.

Corr. ID: 530 **Organization:** *Not Specified*

Comment ID: 175949 **Organization Type:** Unaffiliated Individual

Representative Quote: 16. Need regular and recurring maintenance on roads open to ORV commensurate with level/area of access anticipated or planned for.

Corr. ID: 533 **Organization:** *Not Specified*

Comment ID: 176015 **Organization Type:** Unaffiliated Individual

Representative Quote: Kiosks with what regulations apply (travel) and points of interest.

Corr. ID: 539 **Organization:** *Not Specified*

Comment ID: 175593 **Organization Type:** Unaffiliated Individual

Representative Quote: The problem with Lone Rock is that it is managed in the summer and not in the off season.

I have seen where pallets have been burned which leaves a large number of nails. With a large fire for some unknown reason the folk chuck their beer bottles in the fire. So I think that a closure should happen in the off season unless you have year round management.

But to restore Lone Rock ORV area to natural status is cost stupid.

Corr. ID: 544 **Organization:** UT/AZ ATV club

Comment ID: 176059 **Organization Type:** Unaffiliated Individual

Representative Quote: Remember, MANAGING does NOT mean CLOSING! As a land manager in a recreation area that has the potential of such magnificent opportunities for such a diverse group of users, I would hope that you would be exploring more opportunities, not looking to restrict them, as it seems from your brochure.

1- Trail Heads with kiosks including maps highlighting scenic cultural and other opportunities

2- Loop trails with numbers ratings and mileages

AL 5085 - Street-legal / Non-street legal ATVs

Concern ID: 27362

CONCERN STATEMENT: Several commenters stated opposition to only allowing "street legal" vehicles within the NRA, because many people who currently operate vehicles in the NRA operate non-street legal vehicles. Commenters requested that the plan allow for non-street legal vehicles within the NRA, because many of these vehicles cause less damage than street-legal vehicles.

Representative Quote(s): **Corr. ID:** 79 **Organization:** Tri- State ATV Club & Northern Utah ATV Club

Comment ID: 171880 **Organization Type:** Unaffiliated Individual

Representative Quote: Also of concern is access to routes like the Flint

Trail from Hite Crossing to Hans Flat and Sunshine Pass to Hatch Canyon going to the Dirty Devil River. To do most of these routes you need a "street legal ATV" which prohibits many persons from riding them. It is an added cost to those of us on fixed incomes and makes it impossible to modify our machines to be "street legal".

Corr. ID: 86 **Organization:** *Not Specified*

Comment ID: 171920 **Organization Type:** Unaffiliated Individual

Representative Quote: Why are only ATVs that are "street legal" allowed on ATV Trails and Roads with the NRA? That should not be the case. Please remove the language from your future regulations that only allows street legal vehicles to travel within the boundaries of the GCNRA.

Trails such as the Flint Trail from Hite Crossing to Hans Flat and Sunshine Pass to Hatch Canyon going to the Dirty Devil River can only be done with "Street Legal" ATVs. This doesn't allow a considerable number of ATV enthusiasts to enjoy these trails because it is expensive to convert their machines to "Street Legal". Please do not restrict ATVers who respect the rules and regulations to be excluded. My husband and I treasure our privileges of riding our ATVs and ride so that we can continue to enjoy the trails in Utah.

Corr. ID: 88 **Organization:** *Not Specified*

Comment ID: 171898 **Organization Type:** Unaffiliated Individual

Representative Quote: I am disappointed that I must expend even greater amounts of money to conform my vehicles to the street legal standard that has been imposed.

Corr. ID: 99 **Organization:** Tri-State ATV Club (Hurricane, UT)

Comment ID: 172117 **Organization Type:** Unaffiliated Individual

Representative Quote: Also, the pictures you show in your brochures are made by a Jeep or 4 wheel drive truck, with 45 lbs of air in their tires, which make deep ruts in the ground. ATV's are very light and only have 5 lbs. of air in their tires, which make very little impact on the areas they travel in. If jeeps and trucks are legal on some the roads, why not ATV's? ATV's have far less impact on the environment than these heavier vehicles.

Corr. ID: 99 **Organization:** Tri-State ATV Club (Hurricane, UT)

Comment ID: 172004 **Organization Type:** Unaffiliated Individual

Representative Quote: I am a member of the Tri-State ATV Club and we hold a Club Jamboree in March every year. We have people that come from Nevada and many other states in this area, as well as from Back East and the Middle West to attend this Jamboree. Their ATV's are not street legal. These people want to ride in our beautiful area of Glen Canyon. Being street legal or non-street legal would not make an impact on these areas. I request that you do not make the law for the ATV's to be street legal.

Corr. ID: 285 **Organization:** *Not Specified*

Comment ID: 174752 **Organization Type:** Unaffiliated Individual

Representative Quote: Upon retiring we left the metropolitan lifestyle and moved to Kanab to enjoy a more rural lifestyle. Part of that lifestyle is the ability to enjoy our public lands and recreation areas. Since retirement I have watched the BLM conduct scoping plans and inventories of public lands always with the same result, planned closures of the public lands that we have supported through our tax dollars. We have been visiting the Glen Canyon NRA since the middle 1970's and have witnessed the deterioration of the 'Lake Powell Experience'. It seems the NRA has become a cash cow

for the Federal Government and its partner Aramark Enterprises. It used to be you could find a quiet shore to camp on the lake and enjoy an evening. Now there are too many houseboats who camp right on top of you, run jet ski's from sunup to sundown, and then blare music well into the night. There is absolutely no law enforcement on the lake to keep any sense of order and it has become a free for all on who can spend the most money and be the most obnoxious. With that said, now it is proposed that back country areas of the NRA are facing proposed closures for no apparent reason. We ATV to many points above the lake shore and no one on the lake ever sees you, or cares. In 2008 we spent considerable money making our machine 'street legal' per Utah motor vehicle laws. That included additional insurance costs and licensing fees. The intent was to be able to use a ATV/UTV in all areas legal for motor vehicles. The plan to now impose restrictions on them in the NRA is counter productive to the intent of the licensing them in the first place. It will also cause confusion for those who are simply attempting to obey the existing motor vehicle laws. My wife and I are reaching an age where we are not able to hike long distances as we did when we were younger. We will all get there sooner or later. Additionally, I have never seen a hiker on any trail or road within the NRA unless it was within walking distance of the lake shore. These proposed restrictions on motorized access to our public lands and back country are discriminatory and offensive. This type of action is in part what further serves to divide our country and create resentment for the Federal Government and its employees. I fully support Alternative A and sincerely hope that these comments will be taken into consideration when a travel management plan is decided upon.

Corr. ID: 345 **Organization:** Northern Utah ATV Trail Riders

Comment ID: 174934 **Organization Type:** Unaffiliated Individual

Representative Quote: I fully support Alternative A as a viable solution to mixed used of Federal and State lands operated by NPS and State Park Service. This beautiful part of our great country should remain accessible for enjoyment by multiple means of conveyance. I specifically believe that to require ATV's to be street legal is not in the best interest of the public. Non-street legal ATV's have not been proven to impact the environment any more than street legal machines. The ATV community continues to expand and we are becoming more and more aware of the need to encourage responsible ATV riding and to protect our natural resources. The ATV community is fully aware of the need to police our own ranks when there are obvious misuses of public lands by fellow ATV enthusiasts. The club to which I belong is rapidly becoming one of the foremost ATV clubs in Utah. We promote safe riding, environmental responsibility and fun. Other ATV clubs are know to share these ideals and work vigorously to educate members on these important issues.

KEEP OUR PUBLIC LANDS OPEN TO ACCESS FOR MULTIPLE USERS!

Corr. ID: 454 **Organization:** SPEAR (Sanjuan Public Entry and Access Rights)

Comment ID: 175832 **Organization Type:** Unaffiliated Individual

Representative Quote: Your street-legal policy is very restrictive and completely baffles us as to the purpose of having a horn and turn signals,(ATVs already have lights, brake lights, tail lights) and we do not understand the intent of this requirement. The law as written by the State of Utah, intended to be a requirement for OHVs used on streets and highways. It requires certain extra safety equipment that would have no necessary application for use on dirt roads in the recreation area. Your policy also

creates an inconsistency between the Park Service and other agencies. It doesn't make much sense to travel a road on the BLM and suddenly enter the NRA and find you can not continue because your vehicle is not properly equipped.. We recommend that you eliminate that requirement in your new plan.

Corr. ID: 484 **Organization:** *Not Specified*

Comment ID: 174810 **Organization Type:** Unaffiliated Individual

Representative Quote: I also think the street legal requirement is ridiculous considering the requirement for TURN SIGNALS to operate on a dirt road.

Corr. ID: 503 **Organization:** Kanab City Council

Comment ID: 176145 **Organization Type:** Town or City Government

Representative Quote: We believe there is no justification for the existing policy decision to only allow licensed ORVs within the Glen Canyon National Recreation Area. We do not support the use of unlicensed ORVs on roads where such use would violate local law. However, we do not believe there is any connection between licensed as opposed to non-licensed ORV use on road and trails where such use does not violate local law. We do not believe there is any physical difference between the impact of a licensed as opposed to a non-licensed ORV with one important exception. The individuals who license their ORV are typically somewhat older and more responsible in their off road driving practices.

Corr. ID: 517 **Organization:** Kane County Commission

Comment ID: 175511 **Organization Type:** County Government

Representative Quote: There is no provision that bans unlicensed vehicles in the GCNRA's enabling legislation. Also, the settlement of the 2005 lawsuit referenced on page 3 of the Scoping Brochure is a door that swings both ways. It does not mandate the elimination or restriction of unlicensed ORVs. Where appropriate, and with public involvement and environmental analysis, it allows the agency to designate routes and areas for unlicensed ORV use. Excluding such an option improperly narrows the "decision space" and the range of the Alternatives.

There are compelling reasons for considering at least one alternative that allows unlicensed ORVs on some or all unpaved roads in the NRA. First and most importantly, the GCNRA is not a National Park, and unlicensed ORVs should be considered a suitable use of the NRA. Unlicensed ORVs are allowed on lands adjacent to the GCNRA, including on roads within the Grand Staircase Escalante National Monument. Unlicensed ORVs are allowed on unpaved roads in Kane County. Allowing unlicensed ORVs on certain roads is consistent with Kane County's ordinances.

Allowing unlicensed ORVs provides several benefits. First, doing so will enhance recreational use of the NRA consistent with the enabling legislation. Allowing unlicensed ORVs will also improve the agency's opportunity to leverage funds for management and enforcement that are available via Utah State Parks and Recreation's OHV program. Kane County, as well as user groups, is eager to cooperate with any federal agency that provides for this popular recreational use.

The County requests the agency include an alternative that amends the GCNRA plan allowing for unlicensed ORVs on some or all of the unpaved roads in the NRA.

Corr. ID: 526 **Organization:** San Juan County Commission

Comment ID: 176042 **Organization Type:** Unaffiliated Individual

Representative Quote: Current NRA policy allows only those ORV/ATVs

that are equipped as "street legal" to use unpaved roads. Limiting the type of recreational vehicle that can be used in a "recreation" area appears somewhat incongruent with the purposes for which the NRA was established. We believe this restriction is unfair and unnecessary. "Street legal" requires that a vehicle have all the equipment necessary for safe travel on a highway or street where it is imperative that vehicles be highly visible and able to signal their intent to stop or turn to other vehicle traffic. Certainly a headlight, taillight and brakes are important for all vehicles on paved as well as unpaved roads. Current Utah law requires this equipment on standard ATVs. However we do not agree that full "street legal" equipment (i.e. turn signals) is necessary equipment for the relatively slow speed travel on the lightly traveled unpaved roads in the NRA. We urge you to reconsider the current policy and allow both "street legal" and "non-street legal" vehicles to use unpaved roads. One of the alternatives for the ORV Plan should include use by "non-street legal" vehicles. This would be consistent with San Juan County's OHV Ordinance. This policy would also be and should be consistent with the policies on adjoining BLM lands and nearby USFS lands and thereby make travel from one agency's lands to another possible for all OHV registered vehicles. Use of "non-street legal" ORV/ATVs is especially important on the Hole In The Rock Trail with its unique heritage link to many San Juan County residents.

Corr. ID: 544 **Organization:** UT/AZ ATV club

Comment ID: 176058 **Organization Type:** Unaffiliated Individual

Representative Quote: I'm sure you know or at least you should know, that ATVs and UTVs create the least amount of impact of all motorized vehicles, pounds per square inch is less than a footprint. With that in mind, it should be the last form of transportation you would want to restrict! Myself, I don't have any problem restricting cross country travel; except in designated areas, but see no sense in restricting travel on existing roads and trails. I also would suggest that you adapt a policy that recognizes STREET LEGAL from the state that the vehicle is registered. This would make it easier on your law enforcement officers. Also from a usage impact view, there is NO difference between a STREET LEGAL or a NON STREET LEGAL vehicle, therefore any restriction should be based on state laws, not internal opinion.

Concern ID: 27426

**CONCERN
STATEMENT:**

[Some commenters suggested opening specific routes to ATV traffic.](#)

Representative Quote(s): **Corr. ID:** 109 **Organization:** Public Lands Equal Access Alliance

Comment ID: 172175 **Organization Type:** Unaffiliated Individual

Representative Quote: We propose that Glen Canyon Recreation Area, open to ATVs non-street legal and street legal the following route, Flint Trail from Hite crossing to Hans Flat route 633, Sunshine pass to Hatch Canyon going to the Dirty Devil River route 730. Route 731 to the big Ridge, route 763 to Panorama Point, routes 774/775 to Cleopatra's Chair, route 450 Hole in the Rock Trail, route 330 Hole in the rock trail, Route 777 Orange Cliffs, and route 651 Blue Notch Canyon. These routes are in areas that the terrain requires that you stay on the route. These routes are not passable by most vehicles. Most of these routes are in areas that are remote and are very hard to maintain. Please do not try to ban the public from accessing the great scenic and historic areas that have been placed in your care.

Corr. ID: 109 **Organization:** Public Lands Equal Access

Alliance

Comment ID: 172286 **Organization Type:** Unaffiliated Individual

Representative Quote: 1. This is stated as an "Off-Road Vehicle Management Plan"; We feel that not allowing off-road vehicles in the Glen Canyon National Recreation in all of the alternatives is very deceiving. Limiting only street legal ATV's to a few routes only is not management. We would like to see non-street legal ATV's Side by side's and OHM's allowed on the non paved routes in the GCNRA.

Corr. ID: 531 **Organization:** *Not Specified*

Comment ID: 175972 **Organization Type:** Unaffiliated Individual

Representative Quote: Should allow non-street legal ATVs at Hole-in-the-Rock and Red Canyon/Blue Notch Pass

AL 5090 - Close specific routes

Concern ID: 27363

CONCERN STATEMENT: Many commenters provided specific roads, routes, and areas that they believe should be closed to ORV traffic.

Representative Quote(s): **Corr. ID:** 163 **Organization:** *Not Specified*

Comment ID: 172375 **Organization Type:** Unaffiliated Individual

Representative Quote: Withdrawal from ALL VEHICLE USE of some trails/roads in GCNRA that are: 1. in sensitive areas, 2. have already shown illegal ORV/ATV use on adjacent land accessed by the trail/road, or 3. that lead to trails within the adjacent national monuments/parks that are closed to all vehicles.

Corr. ID: 199 **Organization:** *Not Specified*

Comment ID: 175163 **Organization Type:** Unaffiliated Individual

Representative Quote: We want to be sure that you close ATV/ORV routes leading to routes on other public lands where ATV/ORVs are prohibited: proposed wilderness lands, parts of Canyonlands and Grand Staircase-Escalante. Please do your job in protecting our precious public lands for future generations.

Corr. ID: 351 **Organization:** Maryland Ornithological Society

Comment ID: 176056 **Organization Type:** Unaffiliated Individual

Representative Quote: We submit the following recommendations about GCNRA routes where illegal ATV riding off the designated routes could damage wildlife habitat and wilderness values:

Road 330, Hole-in-the-Rock Road (HITR), west of Lake Powell. ATVs would jeopardize the NPS wilderness recommendations for Kaiparowits (58,755 acres) and Escalante (253,105 acres) units and contiguous roadless areas in Grand Staircase-Escalante National Monument that are proposed for wilderness in ARROWA. Please change Alternatives D and E to restrict this road to conventional vehicles, as under pre-2008 management.

Road 450, HITR, east of Lake Powell. ATVs would jeopardize the NPS wilderness recommendation for Wilson Mesa unit (81,910 acres) and contiguous Nokai Dome BLM roadless area, proposed for wilderness in ARROWA. Please change Alternatives D and E to restrict this road to conventional vehicles, as under pre-2008 management.

Rincon jeep trail, off Road 450. We support the prohibition against ORVs

using the old jeep trail from Road 450 to The Rincon. This obsolete miners' route would cut 6 miles through the Wilson Mesa recommended wilderness unit. No alternative allows vehicles on this route, but we are aware that ORV riders have asked you to open it. Please reject that idea. It is beyond the scope of this ORV planning project because it would necessitate amending the NPS wilderness recommendation and the General Management Plan.

Road 332, Moody Canyon Road. ATVs would jeopardize the NPS wilderness recommendation for the Escalante unit and the contiguous Colt Mesa BLM roadless area, proposed for wilderness in ARWA. Please change Alternative E to restrict this road to conventional vehicles, as under pre-2008 management.

Two unnumbered routes west from the Beef Basin Road, at Imperial Valley and Bull Valley. ATVs would jeopardize the NPS wilderness recommendation for Dark Canyon, a contiguous BLM wilderness study area, and other lands proposed for wilderness in ARWA. We are aware that ORV fans have asked for even more routes in this area to create a loop for ATV riders. Please reject that idea and continue to restrict these to conventional vehicles. No alternative allows ATVs on these routes.

Corr. ID: 431 **Organization:** Grandmothers

Comment ID: 175782 **Organization Type:** Unaffiliated Individual

Representative Quote: Alternatives A, D and E do not restrict use of roads that lead to closed routes in other NPS or NM areas. Such routes should not be opened to ORV use, because they will inevitably venture onto the restricted areas.

Corr. ID: 462 **Organization:** *Not Specified*

Comment ID: 175847 **Organization Type:** Unaffiliated Individual

Representative Quote: Allowing ATV/ORV use at the Ferry Swell Area opens up a can of worms. If you allow these vehicles to cross between the BLM and the Ferry Swell area, they will find their way into other areas. Illegal roads will be created, resource degradation will ensue. There is plenty of land in the BLM for these vehicles, GCNRA doesn't need to permit them. The same problem occurs with allowing them on all unpaved roads. These areas are so big, they would be nearly impossible to police. I think closing some of the unpaved roads to all vehicles would be a good idea as well. There are other options for access, like boating and hiking.

Corr. ID: 480 **Organization:** *Not Specified*

Comment ID: 175023 **Organization Type:** Unaffiliated Individual

Representative Quote: We urge you to revise Alternatives D and E to ban ATV travel on these specific roads adjoining roadless areas:

- Roads 264 and 230, adjoining proposed wilderness in Grand Staircase-Escalante National Monument.
 - Road 330 (Hole in the Rock Road, west), adjoining Escalante and Kaiparowits NPS recommended wilderness units.
 - Road 450 (Hole in the Rock Road, east), a cherrystem penetrating Wilson Mesa NPS recommended wilderness unit, also adjoining BLM Nokai Dome roadless area proposed for wilderness in America's Red Rock Wilderness Act (ARRWA).
 - Road 332 (Moody Canyon Road) at Purple Hills, adjoining Escalante NPS-recommended wilderness unit and BLM Colt Mesa proposed wilderness (ARRWA).
 - Road 633, northeast from Rite, near BLM's Fiddler Butte wilderness study area and other BLM "non-WSA lands with wilderness characteristics."
- All the alternatives in the October 2010 brochure would prohibit A TV s on

the following roads, and we support this prohibition:

- Roads in the Orange Cliffs panhandle (Roads 633, 731, 744, 763, etc.). This is the back country zone where several roads adjoin the NPS-recommended Orange Cliffs wilderness and potential wilderness addition. Some of these roads are also near the BLM Horseshoe Canyon (south) WSA and French Spring-Happy Canyon WSA. To the east, they are near Canyonlands National Park. We strongly support keeping ATVs out of the panhandle because they could do great damage to Canyonlands and all the proposed wilderness units. Some day the entire area may be unified under NPS management. If ATVs became established in this area, it could thwart future NPS management.

- Unnumbered roads west from Beef Basin in Imperial Valley and Bull Valley, near NPS recommended Dark Canyon wilderness unit and the BLM Dark Canyon WSA complex and "non-WSA lands with wilderness characteristics." ORV fans have proposed opening these routes to ATVs, so they could ride in from Beef Basin. Those fans envision a loop route for ATVs, and they plot other routes that are not shown on the NPS map. Please hold the line and keep ATVs out of this area. The ATV riders will take it over if you let them. That would degrade the wilderness values of this area.

Corr. ID: 480 **Organization:** *Not Specified*

Comment ID: 175024 **Organization Type:** Unaffiliated Individual

Representative Quote: Rincon Route

We oppose the suggestion by ORV fans to reopen the old jeep route from Road 450 to The Rincon. That would split off part of the Wilson Mesa NPS-recommended wilderness unit. It would also introduce motor vehicles into The Rincon, a spectacular abandoned meander of the Colorado River. The Rincon and Wilson Mesa make up a great roadless area and wilderness candidate. Please keep it intact. The ORV route would entail revising the NPS wilderness recommendation and the General Management Plan, so the idea clearly is beyond the scope of the current ORV planning project.

Corr. ID: 482 **Organization:** *Not Specified*

Comment ID: 175028 **Organization Type:** Unaffiliated Individual

Representative Quote: Since the ORV definition change in 2008, management must be aware of the ongoing degradation by ORVs now present in Glen Canyon NRA. 1. Grey and Wilson mesas: Because of the difficulty of travel from Lake Canyon to the mesas by conventional vehicles, this area used to see little traffic. Now, the area has become quite trashed by ORV groups. Of particular importance is the ongoing use of the original Emigrant Road (also called the Slickrocks and Harrys Slideoff) by ORVs. As well, there are now ORV tracks virtually everywhere on Wilson Mesa and going "along the peninsulas formed by the various canyons. Even Escalante Cave has been visited by ORVs.

Corr. ID: 497 **Organization:** *Not Specified*

Comment ID: 175135 **Organization Type:** Unaffiliated Individual

Representative Quote: I have particular concern about the Hole in the Rock area as well as the Orange Cliff area up near Canyonlands. There are some states that cannot street legal their ATVs and if these areas are only open to street legal ATVs, many will not be able to ride on these, our public lands.

Corr. ID: 515 **Organization:** *Not Specified*

Comment ID: 175238 **Organization Type:** Unaffiliated Individual

Representative Quote: All five alternatives in your brochure bar ATVs from the dirt and gravel roads in the northern panhandle, which is being managed as back country. However, Alternatives D and E allow ATVs on other roads where they would go off-road and damage both NPS and BLM

roadless areas. Those should be reversed before the draft plan is published. Examples include the Hole in the Rock Road (Road 450) adjacent to a roadless area NPS has recommended for wilderness designation, Moody Canyon Road (Road 332) exposing the Colt Mesa BLM wilderness inventory area to ATVs, and Road 633 exposing the Fiddler Butte BLM wilderness inventory area to ATVs

Corr. ID: 515 **Organization:** *Not Specified*

Comment ID: 175241 **Organization Type:** Unaffiliated Individual

Representative Quote: Please reject off-roaders' proposal to reopen the old miners' jeep trail from Road 450 down to the Rincon, breaching the Wilson Mesa roadless area which NPS has recommended for wilderness status. Changing the wilderness recommendation is not within the scope of this ORV plan, so this proposal need not be considered further.

Corr. ID: 519 **Organization:** *Not Specified*

Comment ID: 175548 **Organization Type:** Unaffiliated Individual

Representative Quote: Alternatives D and E would authorize ATVs on several remote, unpaved roads that would serve as staging areas for illegally riding off into the back country. Please revise those alternatives to keep ATVs away from roadless areas that are candidates for wilderness under either NPS or BLM jurisdiction. The Wilson Mesa/Rincon and Nokai Dome roadless areas are at risk of ATVs from Road 450. The Purple Hills and Colt Mesa are at risk of ATVs from Road 332. Fiddler Butte roadless area is at risk of ATVs from Road 633. There may be other roads with similar problems. This issue needs further study before you issue a draft plan. The impacts of illegal off-road travel should be analyzed in the EIS.

Corr. ID: 525 **Organization:** *Not Specified*

Comment ID: 175333 **Organization Type:** Unaffiliated Individual

Representative Quote: I oppose any reopening of the Rincon ORV trail. ORV groups are pushing you to open it, but I believe the area is more valuable as a roadless area. The National Park Service has recommended the Wilson Mesa area for wilderness status, including the Rincon, a spectacular abandoned meander of the Colorado River. This area is contiguous to the Nokai Dome roadless area, which BLM found to have wilderness character.

Corr. ID: 542 **Organization:** Southern Utah Wilderness Alliance

Comment ID: 176103 **Organization Type:** Conservation/Preservation

Representative Quote: Comment: SUWA specifically requests that NPS prohibit ATV (and where appropriate all motor vehicle use) use on routes in the GCNRA that: 1) connect to trails in the Grand Staircase-Escalante National Monument and Canyonlands National Park that are closed to all motor vehicle use and/or closed to ATV use, including the two proposed routes in the Purple Hills/Fourmile Bench area, the Hole in the Rock route, and the routes on the east and west side of Last Chance Bay; and 2) connect to controversial trails in areas proposed for wilderness designation on BLM lands managed by the Richfield and Monticello BLM offices (including proposed routes in the Imperial Valley, Dry Mesa, Blue Notch, Red Canyon, and Grey Mesa areas). These routes are identified on the map at Attachment 1.

Corr. ID: 546 **Organization:** *Not Specified*

Comment ID: 176067 **Organization Type:** Unaffiliated Individual

Representative Quote: We understand that ORV fans have asked you to allow ORVs on the Rincon route, from Road 450 north to the Rincon. Originally a mineral exploration trail, this 6-mile route would cut a roadless area in two and defeat the Park Service's wilderness recommendation for the Rincon and Wilson Mesa. Please keep ORVs off that route and protect the

unimpaired natural landscape.

AL10000 - Alternatives: Alternative E

Concern ID: 27364

CONCERN STATEMENT: Commenters suggested that alternative E is not consistent with the NRA's enabling legislation, and that alternative E should eliminate ORV access on dirt roads adjacent to proposed wilderness areas, and provide for enhanced enforcement techniques.

Representative Quote(s): **Corr. ID:** 114 **Organization:** BlueRibbon Coalition
Comment ID: 175763 **Organization Type:** Unaffiliated Individual
Representative Quote: Alternatives B, C and E are not consistent with the enabling legislation
Congress established the GCNRA "(a) In order to provide for public outdoor recreation use and enjoyment of Lake Powell and lands adjacent thereto in the States of Arizona and Utah and to preserve scenic, scientific, and historic features contributing to public enjoyment of the area..."

Alternatives B, C and E all eliminate a highly valued recreation experience (licensed ORVs on unpaved roads). This is directly in conflict with intent of Congress.

Again, we wish to emphasize that the GCNRA is a National Recreation Area, not a National Park. There is no compelling reason to develop an entire "range" of Alternatives that all significantly reduce a valued recreation experience.

Corr. ID: 393 **Organization:** Glen Canyon Institute
Comment ID: 175497 **Organization Type:** Unaffiliated Individual
Representative Quote: Glen Canyon Institute recommends that alternatives D and E be revised to eliminate ORV access on dirt road adjacent to proposed wilderness areas, where illegal use would be difficult to prevent. We believe that the most appropriate outcome of the EIS process would be to prohibit ORV access throughout GCNRA. At the least, to meet the minimal requirements of the law, the plan should greatly reduce access from current rules. We urge you to develop and implement such a plan for GCNRA.

Corr. ID: 429 **Organization:** University of Illinois - Urbana-Champaign
Comment ID: 175779 **Organization Type:** Unaffiliated Individual
Representative Quote: Considering the fact that ATV's are already categorized as high-impact recreation, the carrying capacity and threshold for maximum allowable impact is presumptively low. This is why additional measures are necessary to prevent a paradoxical backlash from proposal E. In example, disallowing Motorized Recreation at Lone Rock Beach and adjacent shorelines for the preservation of its landscape can easily be counteracted by an influx of motorized recreation on GMPs; and in following, the damage of their landscapes. In an effort to proactively respond to such a threat, techniques for reducing use should be added into the management proposal, "E." Techniques can vary from self-registration, permits and attendance quotas. The former may be ineffective in actually reducing use, but by placing a cap on Motorized Recreation at GMP's - use will be significantly reduced, and may add to the prestige of the National Recreation Area. This in turn, could result in a newfound appeal towards

"trophy recreationists" who salivate at the mere mention of exclusivity.

Corr. ID: 470 **Organization:** Bureau Of Land Management

Comment ID: 175878 **Organization Type:** Federal Government

Representative Quote: If Alternative E is selected, we request that GLCA continue to coordinate with the MFO on consistent interpretive signage and boundary marking procedures. The MFO is interested in developing coordinated efforts to produce interpretive and educational materials that help to clarify the similarities and differences in our mandates and management direction across our respective boundaries. Of particular concern and need is the development of consistent messaging related to the definition of a "street-legal ATV." The MFO is also interested in embodying this information in our official travel management maps that will eventually be available both electronically and in a hard-copy format.

Corr. ID: 546 **Organization:** *Not Specified*

Comment ID: 176066 **Organization Type:** Unaffiliated Individual

Representative Quote: Please rewrite your draft Alternatives D and E to prohibit ATVs on these routes bordering on roadless areas: Hole in the Rock Road (Roads 330 and 450), Purple Hills (Road 332), and Andy Miller Flats (Road 633). This would return these roads to their status before 2008, allowing only conventional vehicles such as cars and 4WD jeeps. If ATVs are allowed on those remote roads, you would not have enough park rangers to keep them from going off-road and destroying natural values.

AL11000 - Alternatives: Access for those with Disabilities

Concern ID: 27365

CONCERN STATEMENT: Many commenters asked the NPS to provide access for those with disabilities.

Representative Quote(s): **Corr. ID:** 17 **Organization:** *Not Specified*

Comment ID: 174939 **Organization Type:** Unaffiliated Individual

Representative Quote: Please think of individuals that have limited physical abilities due to age, health and birth defects. They shouldn't be denied the chance to witness the beauty of this area at any time.

Corr. ID: 31 **Organization:** *Not Specified*

Comment ID: 175004 **Organization Type:** Unaffiliated Individual

Representative Quote: There is also a very important aspect that is often overlooked when deciding the fate of ORV's on public land. Due to physical limitations or handicaps, many people are unable to access the beautiful, but rugged parts of our country without the use of some type of ORV. I am now falling into this category. I used to enjoy hiking into the backcountry as much as ORVing. But now only in my mid 40's I have a deteriorating condition in my legs that makes it almost impossible for me to hike even a mile or so - and I expect this will get worse as the years go by. Without ORV access I will have ZERO access to my public lands. I agree that ORV's shouldn't be allowed everywhere, but to ban them from existing roads and trails where they have already had access for generations is absolutely wrong. Especially in regard to the millions of Americans with disabilities.

Corr. ID: 37 **Organization:** American Legion Post 24

Comment ID: 175153 **Organization Type:** Unaffiliated Individual

Representative Quote: We have handicap accessible law and then close public lands to those with mobility issues, it doesn't make sense.. Older

citizens do not want to be limited to handicap parking at Wal Mart. We love to get out and see all types of areas, even if we are limited to roads and trails.

Corr. ID: 41 **Organization:** Blue Ribbon Coalition

Comment ID: 175202 **Organization Type:** Unaffiliated Individual

Representative Quote: I am disabled and that is the only way I can experience our back country and recreation areas.

Corr. ID: 47 **Organization:** *Not Specified*

Comment ID: 175232 **Organization Type:** Unaffiliated Individual

Representative Quote: I am a 60 year old retired executive who used to be a backpacker. Health (primarily arthritis) now precludes me from enjoying the backcountry the way I used to. My husband and I rely on our Jeep or our quads to take us off the beaten path and we rely on the availability of roads and marked trails in our nation's public lands.

Corr. ID: 54 **Organization:** *Not Specified*

Comment ID: 175270 **Organization Type:** Unaffiliated Individual

Representative Quote: In some cases, ATVs provide the only way for some people to access and enjoy the outdoors.

Corr. ID: 503 **Organization:** Kanab City Council

Comment ID: 176147 **Organization Type:** Town or City Government

Representative Quote: We are concerned that the proposed alternatives have no correlation with Section 503 and Section 504 requirements of the Americans with Disabilities Act. While federal lands are exempt from most ADA requirements, they are still required by law to develop a 503/5 04 plan for addressing accessibility issues on the federal lands they manage. If such a plan exists, it has clearly not been taken into consideration in the proposed alternatives. If it has not been developed, the Glen Canyon National Recreation Area is in violation of federal law and should remediate this shortcoming. This issue is especially important when considering the Lone Rock beaches since there are very few locations on Lake Powell that could be easily accessed by individuals with disabilities. ORVs, especially side-by-side vehicles, provide an outstanding way to transport individuals with disabilities in their efforts to enjoy the Glen Canyon National Recreation Area.

Corr. ID: 517 **Organization:** Kane County Commission

Comment ID: 175454 **Organization Type:** County Government

Representative Quote: The County is also concerned about access by the elderly or disabled, many of whom, must rely on motorized ATV's/UTV's, as well as conventional motor vehicles, to access many of the remote areas and scenic vistas that the GCNRA has to offer.

Corr. ID: 528 **Organization:** Utah/Arizona ATV Club of Kanab

Comment ID: 175936 **Organization Type:** Unaffiliated Individual

Representative Quote: For seniors, riding OHV's is a safer form of off highway and backcountry recreation especially for those who may be physically limited, disabled and handicapped. When physically limited senior citizens travel together in one vehicle the chance of breaking down or becoming stuck due to conditions could result in a possible life-threatening situation for both individuals. As generally practiced by OHV users traveling either in groups or in pairs you have another individual or partner to help and another serviceable vehicle to use if a breakdown occurs. Therefore, in my opinion restricting OHV use penalizes this group of senior Americans who may be physically limited from safely enjoying the opportunity to recreate as others can do as they please. This is also unfair to

Americans who have worked most of their lives, then look forward to enjoying their retirement and find that they are singled out and denied their due process rights because of their age or physical restrictions.

Concern ID: 27431

CONCERN STATEMENT: One commenter suggested that only the elderly and the physically

STATEMENT: handicapped should be allowed to use ORVs in the NRA.

Representative Quote(s): **Corr. ID:** 21 **Organization:** *Not Specified*

Comment ID: 174830 **Organization Type:** Unaffiliated Individual

Representative Quote: Limit the use of ORVs to the elderly (>70 years of age) and the physically handicapped. Anyone else who wants to access Lake Powell will be required to walk to the lake.

AL4000 - Alternatives: New Alternatives Or Elements

Concern ID: 27366

CONCERN

STATEMENT:

Several commenters provided new alternatives or elements to the alternatives, such as: allowing unlicensed ATVs and UTVs on some or all of the unpaved roads in the NRA, providing an alternative that increases ORV access, stop grading the road that leads to Crosby Canyon, combining alternatives C and D, providing a shuttle service within the NRA, constructing additional rest areas, providing clearly marked routes, establishing a permit system, mandating safety requirements for pedestrians, establishing ORV capacity limits for certain areas, granting livestock permittees administrative access, applying adaptive management, establishing pedestrian-only areas that are far away from ORV use areas, organizing volunteer trail maintenance opportunities, enabling volunteers to help with enforcement activities, and establishing a noise threshold requirement for all vehicles.

Representative Quote(s): **Corr. ID:** 28 **Organization:** *Not Specified*

Comment ID: 174987 **Organization Type:** Unaffiliated Individual

Representative Quote: If you don't want people in Crosby Canyon simply quit grading the road.

Corr. ID: 40 **Organization:** Toyota Land Cruiser Assoc.; Blue Ribbon Coalition

Comment ID: 175178 **Organization Type:** Unaffiliated Individual

Representative Quote: We request the agency formulate at least one alternative that allows unlicensed ATVs and UTVs on some or all of the unpaved roads in the NRA. There is no provision that bans unlicensed vehicles in the GCNRA's enabling legislation. Also, the settlement of the 2005 lawsuit does not mandate the elimination or restriction of unlicensed ORVs. Where appropriate, and with public involvement and environmental analysis, it allows the agency to designate routes and areas for unlicensed ATV and UTV use.

There are compelling reasons for considering at least one alternative that allows unlicensed ORVs on some or all unpaved roads in the NRA. First and most importantly, the GCNRA is not a National Park, and unlicensed ORVs should be considered a suitable use of the NRA. Unlicensed ORVs are allowed on lands adjacent to the GCNRA, including on roads within the Grand Staircase Escalante National Monument. Unlicensed ORVs are allowed on unpaved roads in Kane and San Juan Counties in Utah. Allowing

unlicensed ORVs on certain roads is consistent with San Juan and Kane County ordinances.

Allowing unlicensed ORVs provides several benefits. First, doing so will enhance recreational use of the NRA consistent with the enabling legislation. Allowing unlicensed ORVs will also improve the agency's opportunity to leverage funds for management and enforcement that are available via Utah State Parks and Recreation's OHV program. Both Utah counties, as well as user groups, are eager to cooperate with any federal agency that provides for this popular recreational use.

The range of alternatives is too narrow! Of the 4 "action" alternatives, three are proposing significant restrictions on ORV use, including one that virtually eliminates all ORV use. The alternative that is purported to be on the other "range" of options also limits ORV use significantly! To remedy this, we strongly encourage you to formulate an alternative that allows unlicensed ORVs to travel on some or all of the unpaved roads in the NRA.

Corr. ID: 40 **Organization:** Toyota Land Cruiser Assoc.; Blue Ribbon Coalition

Comment ID: 175180 **Organization Type:** Unaffiliated Individual

Representative Quote: In a nutshell, rather than expanding the mileage of backroads and trails available to the greater public desire for multiple-use recreation in this National Recreation Area, most of the "alternatives" available seem to be moving in the opposite direction by offering only to move backwards with regard to areas available for true multiple-use recreation. We hope that you will correct this error and reverse course from the current trend of slowly and inexorably squeezing motorized users out of our publicly-held lands, beginning with this EIS.

Corr. ID: 46 **Organization:** *Not Specified*

Comment ID: 175225 **Organization Type:** Unaffiliated Individual

Representative Quote: Ensure that any alternatives allowing ATVs off-road require clear painted-on route markings, such as the Hells Revenge Trail in Moab.

Corr. ID: 52 **Organization:** Northern Utah ATV TrailRiders

Comment ID: 175266 **Organization Type:** Unaffiliated Individual

Representative Quote: An alternative that does not restrict ATV and UTV use on unpaved roads.

Corr. ID: 57 **Organization:** *Not Specified*

Comment ID: 175290 **Organization Type:** Unaffiliated Individual

Representative Quote: Please keep existing motorized routes open to OHVs and increase opportunities with additional alternatives

Corr. ID: 57 **Organization:** *Not Specified*

Comment ID: 175281 **Organization Type:** Unaffiliated Individual

Representative Quote: I request the agency formulate at least one alternative that allows unlicensed ATVs and UTVs on some or all of the unpaved roads in the NRA. There is no provision that bans unlicensed vehicles in the GCNRA's enabling legislation. Also, the settlement of the 2005 lawsuit does not mandate the elimination or restriction of unlicensed ORVs. Where appropriate, and with public involvement and environmental analysis, it allows the agency to designate routes and areas for unlicensed ATV and UTV use.

Corr. ID: 58 **Organization:** *Not Specified*

Comment ID: 175292 **Organization Type:** Unaffiliated Individual

Representative Quote: What the agency should be doing is promoting the OHV use with organization and new trails that are placed in areas that will not cause harm to the land. Expanding the trail system is the only way to disperse usage on the trails.

Corr. ID: 62 **Organization:** Castle Country OHV Association

Comment ID: 175360 **Organization Type:** Unaffiliated Individual

Representative Quote: Allowing unlicensed ORVs provides several benefits. First, doing so will enhance recreational use of the NRA consistent with the enabling legislation. Allowing unlicensed ORVs will also improve the agency's opportunity to leverage funds for management and enforcement that are available via Utah State Parks and Recreation's OHV program. Both Utah counties, as well as user groups, are eager to cooperate with any federal agency that provides for this popular recreational use.

Corr. ID: 81 **Organization:** NA

Comment ID: 171882 **Organization Type:** Unaffiliated Individual

Representative Quote: Methods to achieve a positive use plan may include:

Special and specific training and permits for ORV users
Specific areas for types of use that allow for some segregation of activities.
Mandatory and inspected policies related to trash, debris, and human waste disposal.

Corr. ID: 88 **Organization:** *Not Specified*

Comment ID: 171894 **Organization Type:** Unaffiliated Individual

Representative Quote: Since this is essentially a travel safety initiative I note that there are no mention of additional safety requirements for pedestrians in the recreation area. This is a clear over site. For example, hikers and climbers in the NRA should be holders of a card which attests to the fact that they have been suitably trained to safely traverse off road areas of the NRA. This is a requirement being placed on all motorized operators by requiring street legal operation, it seems only appropriate that it should extend to the entire population of back area sportsmen. It would have the added benefit of reducing the requirement for back country extraction of the unprepared.

Corr. ID: 113 **Organization:** Public Lands Equal Access Alliance (PLEAA)

Comment ID: 172161 **Organization Type:** Unaffiliated Individual

Representative Quote: 1. This is stated as an "Off-Road Vehicle Management Plan"; We feel that not allowing off-road vehicles in the Glen Canyon National Recreation in all of the alternatives is very deceiving. Limiting only street legal ATV's to a few routes only is not management. We would like to see non-street legal ATV's Side by side's and OHM's allowed on the non paved routes in the GCNRA.

Corr. ID: 158 **Organization:** concerned citizen

Comment ID: 172349 **Organization Type:** Unaffiliated Individual

Representative Quote: Only guided parties, on foot, no exceptions.

Corr. ID: 183 **Organization:** Johns Hopkins Bloomberg School of Public Health

Comment ID: 172715 **Organization Type:** Unaffiliated Individual

Representative Quote: Find another alternative site for off-road ATV use - that is supervised by local park rangers.

Corr. ID: 197 **Organization:** SUWA

Comment ID: 173003 **Organization Type:** Unaffiliated Individual

Representative Quote: Limitation of number of vehicles in all areas.

No one has the right to ruin a public resource. (At least that is the way it needs to be). Enforcement of Executive Order 11644 is required to limit destruction of the park resources. It would be best to totally stop all off road vehicle use; however, not realistic. Reach for as much limitation of off road vehicle use as possible. As much as I would like to see Alternative E established...Alternative D is the most compromise that should be allowed.

Even with Alternative D it is already necessary that you consider number limitations of vehicles and people in all areas being considered. Numbers need to be established and enforcement needs to be increased.

Keep the areas open for vehicles to the minimum you possibly can. Restrict the numbers of vehicles in all such areas to the minimum. We need the greatest protection of resources (prevention of all resource degradation) that is humanly possible.

Corr. ID: 219 **Organization:** *Not Specified*

Comment ID: 173470 **Organization Type:** Unaffiliated Individual

Representative Quote: Combine Alternatives C and E- No ATVs and no off-road use of the park. This would protect the park's resources from the serious impacts of ATVs.

Corr. ID: 222 **Organization:** SUWA

Comment ID: 173497 **Organization Type:** Unaffiliated Individual

Representative Quote: One of the arguments for ORV use in the backcountry is access for handicapped or movement impaired individuals, it's the only way these citizens can see these areas. While I recognize that we want all people to be able to access as many of our natural treasures as possible, all areas can not be made accessible to everyone. As an extreme example, I can no longer climb Mt McKinley in Alaska, and I certainly don't expect the park service to build a road to the top so I can reach the summit. But where do we draw the line with red rock wilderness? Not so easy, but some areas need to be accessible by foot only. Possible wilderness areas should be off limits to ORV until the areas have been fully studied and categorized. One can always open them later if that is deemed appropriate after carefully study, but it takes centuries to erase the marks of such vehicles once they are open. Therefore, a third option may be for public transit, some kind of off road coach to provide access to the above mentioned groups, without the damage of open ORV use. In other words a range of access based on the value and fragility of the resource.

Corr. ID: 335 **Organization:** *Not Specified*

Comment ID: 174790 **Organization Type:** Unaffiliated Individual

Representative Quote: Maybe to promote alternatives that give additional access to those that want to experience solitude away from the motorists. Perhaps, designated trails that give access via foot far from any existing vehicle routes. This allows for those wanting to get away from roads a better chance and does not steel from those who feel using existing access is appropriate.

Corr. ID: 341 **Organization:** *Not Specified*

Comment ID: 174921 **Organization Type:** Unaffiliated Individual

Representative Quote: I hope to be able to travel any place that I wish to go in the future. That being said I know there will need to be maintenance to the roads and trails. If a organized clean up or maintenance day(s) would get published so those of us who are willing to help could plan to be there I think you may be surprised how many ORV enthusiasts would be willing to come

and help. I know if I am able I would come to donate my time and muscle to assist in this type of effort. Thank you for hearing my views.

Corr. ID: 356 **Organization:** *Not Specified*

Comment ID: 175003 **Organization Type:** Unaffiliated Individual

Representative Quote: As stated in the pamphlet under Management Considerations, "A significant problem identified by the project's interdisciplinary team (IDT) and the public was the lack of clear guidance regarding the regulations governing ORV use in the recreation area." An alternative or additional measure to address the "only significant problem identified" could be to motivate the responsible user community to assist the NPS in enforcing adherence to the rules. I realize the easier approach to enforcement is to simply ban ORV access, or severely limit it however; this is not in keeping with the term "recreational area."

Corr. ID: 387 **Organization:** SUWA

Comment ID: 175087 **Organization Type:** Unaffiliated Individual

Representative Quote: Limit the time of year in which ORV's can access this area. Most wilderness areas are more vulnerable during specific times of the year, depending on local weather conditions.

Corr. ID: 387 **Organization:** SUWA

Comment ID: 175089 **Organization Type:** Unaffiliated Individual

Representative Quote: It would be beneficial to the area if Rest Areas were placed in strategic locations along some of the proposed routes. Encourage the ORV users. To dismount their 4-WHEELERS and do some walking on designated trails adjacent to the Rest Areas. Might help them improve their health and enable them to lose a few pounds. Could wind up saving their lives.

Corr. ID: 447 **Organization:** *Not Specified*

Comment ID: 175815 **Organization Type:** Unaffiliated Individual

Representative Quote: I'm concerned that "ATV" is too broad a category. One of the problems with ATVs is the noise that some of them make. They're very loud, thus destroying the outdoor peace and quiet for other park users. I realize that this particular issue is beyond the bounds of this particular issue, but in the future, I would encourage the adoption of a noise requirement, not only on ATVs, but all vehicles (and other pieces of equipment).

Corr. ID: 470 **Organization:** Bureau Of Land Management

Comment ID: 175881 **Organization Type:** Federal Government

Representative Quote: Range management:
The BLM allotments containing GCNRA lands are managed as winter grazing allotments. Depending upon weather conditions, accessing these areas via a full sized vehicle is variable. The use of OHV's is sometimes necessary for both BLM employees and livestock permittees to access these areas for management reasons. Coordination between the two agencies is needed to facilitate range land management needs in those allotments near the GCNRA. That being said; during the open house meeting in Escalante, The BLM was informed that both the BLM and the livestock permittees would be granted administrative access. Even so, the BLM would like to ensure the GCNRA appropriately consider this need.

Corr. ID: 470 **Organization:** Bureau Of Land Management

Comment ID: 175883 **Organization Type:** Federal Government

Representative Quote: Also, GSENM is the administrative arm for livestock grazing on Glen Canyon National Recreation Area (GCNRA). Through the ten-year term grazing permit, livestock permittees are granted the ability, either through cooperative agreement, or as part of their permit, to

access their grazing allotments or improvements; fences (division, boundary, enclosure, and protection), water developments (ponds, springs, pipelines, troughs), and vegetation restoration (seedings, prescribed burns). Many of these sites are in remote rough terrain and require the use of ORV's or some type of other equipment to access the allotment or complete maintenance work on these improvements. The Monument requests that this access continue to be allowed in order to maintain the integrity of the allotments and improvements, and to protect GCNRA's values and purposes.

Corr. ID: 482 **Organization:** *Not Specified*

Comment ID: 175037 **Organization Type:** Unaffiliated Individual

Representative Quote: 4. Lone Rock: Why not designate ONE area of Lone Rock for non-ORV campers only. This is the only easily accessible area on the southern part of Lake Powell for regular folks without ORVs to camp and enjoy the lake. As it is now, since the whole area is open to ORVs, you cannot camp in peace. JUST ONE AREA! !!

Corr. ID: 502 **Organization:** Garfield County

Comment ID: 175311 **Organization Type:** County Government

Representative Quote: 3. Former NRA Superintendent Kitty Roberts made numerous commitments in front of the Garfield County Commission at a formal meeting several years ago. Those commitments included analysis of specific routes asserted by Garfield County as R52477 rights-of-way and evaluation of open ORV areas. The commitments expressed by Superintendent Roberts have been left out of the scoping document.

4. Garfield County asserts right of way authority over many of the roads evaluated in the scoping document and over many roads that have been left out of the document. These roads need to be included in the Environmental Impact Statement, and Garfield County's plan needs to be considered as a reasonable alternative.

Many of these concerns have been expressed previously to NRA staff. In addition to the general comments identified above, we have several specific comments regarding roads, open areas, scope of the ORV Management Plan, cooperative management efforts, right of way authority, statutory traffic authority, and other related issues.

Corr. ID: 503 **Organization:** Kanab City Council

Comment ID: 176141 **Organization Type:** Town or City Government

Representative Quote: We recognize that the Lone Rock area continues to present management problems due to visitor conflicts, safety issues and resource degradation. We also appreciate the recent improvement in management practices and support your leadership in encouraging sound recreation planning. However, we are very concerned that the only management options presented involve closing off areas to ORV use. There is no discussion of management alternatives such as limited or permitted use areas, rerouting of ATV trails away from critical resources, development of alternative ORV use areas, or other impact mitigation strategies. Failure to address such options suggests a pre-conceived bias against the use of ORVs

Corr. ID: 507 **Organization:** ATV Riders of Grenehaven, AZ

Comment ID: 174994 **Organization Type:** Recreational Groups

Representative Quote: We would like to suggest some kind of volunteer "Glen Canyon Off-road Stewardship Program" to help manage and educate the public; on riding responsibly on some roads. Also, a sign-in sheet to some areas might be useful.

Corr. ID: 512 **Organization:** *Not Specified*

Comment ID: 175369 **Organization Type:** Unaffiliated Individual

Representative Quote: My remarks pertain to the Unpaved GMP Roads component of the Alternatives.

2. Travel should be allowed on all existing roads and trails unless they are designated as closed. A road closure should be implemented only for legitimate reasons, after consultation with County and other affected parties.

Corr. ID: 512 **Organization:** *Not Specified*

Comment ID: 175370 **Organization Type:** Unaffiliated Individual

Representative Quote: My remarks pertain to the Unpaved GMP Roads component of the Alternatives.

3. Roads within the recreation area should be posted with road numbers and difficulty ratings. This should also be done in concert with County travel plans.

Corr. ID: 512 **Organization:** *Not Specified*

Comment ID: 175372 **Organization Type:** Unaffiliated Individual

Representative Quote: My remarks pertain to the Unpaved GMP Roads component of the Alternatives.

4. The plan should be dynamic in nature, thus allowing new road segments to be constructed when needed to connect desirable loops etc.

Corr. ID: 514 **Organization:** *Not Specified*

Comment ID: 175259 **Organization Type:** Unaffiliated Individual

Representative Quote: in determining appropriate group sizes, it is important to recognize that there are times when larger groups should be allowed such as for families, Clubs, and organized groups. I would recommend that general group limits be at least 25 vehicles with some allowance for larger groups on a case by case basis. I would urge the NPS to not set artificially low groups sizes that are entirely inflexible.

Corr. ID: 517 **Organization:** Kane County Commission

Comment ID: 175510 **Organization Type:** County Government

Representative Quote: The County requests the agency develop an Alternative that allows unlicensed ORVs on some or all of the unpaved roads in the NRA.

As discussed in the Lone Rock Beach segment above, the County requests that the agency formulate at least one alternative that allows unlicensed ORVs on some or all of the unpaved roads in the NRA.

Corr. ID: 521 **Organization:** *Not Specified*

Comment ID: 175343 **Organization Type:** Unaffiliated Individual

Representative Quote: GCNRA should consider adopting Utah State Motor vehicle Code to regulate Street legal ATV and OHV use. Allowing for the use of street legal ATV/UTV/OHV anywhere in GCNRA

Corr. ID: 531 **Organization:** *Not Specified*

Comment ID: 175981 **Organization Type:** Unaffiliated Individual

Representative Quote: Develop "loop" trail down Hole-in-the-Rock all the way to the lake. For groups of ATVs they could load on a barge and return by another ATV route. Use concessioner barge.

21. Develop trail to Lake on Hole-in-the-Rock Road at Cottonwood Canyon.

Corr. ID: 531 **Organization:** *Not Specified*

Comment ID: 175976 **Organization Type:** Unaffiliated Individual

Representative Quote: It would be nice to have a small piece of Lone Rock with no ATVs that can be used by tent and car campers. This would be a staging area for hiking and kayaking.

Corr. ID: 532 **Organization:** *Not Specified*

Comment ID: 176009 **Organization Type:** Unaffiliated Individual
Representative Quote: Don't say roads are closed when they're accessible with high clearance/4WD. Need to have some way to identify road conditions (similar to fire danger signs).
Corr. ID: 532 **Organization:** *Not Specified*

Comment ID: 176000 **Organization Type:** Unaffiliated Individual
Representative Quote: Consider day use permit for non-street legal ATVs.
Corr. ID: 533 **Organization:** *Not Specified*

Comment ID: 176022 **Organization Type:** Unaffiliated Individual
Representative Quote: The more primitive the route, the more appropriate for ATVs.
Consider ATV routes only.
Corr. ID: 533 **Organization:** *Not Specified*

Comment ID: 176036 **Organization Type:** Unaffiliated Individual
Representative Quote: Can't see the sign in Crosby Canyon from the current roads (because it has been re-routed due to washout). Provide clearer signage that is better maintained.
Corr. ID: 533 **Organization:** *Not Specified*

Comment ID: 176037 **Organization Type:** Unaffiliated Individual
Representative Quote: Need more clarity on "accessible shoreline" definition. What does it mean in Alternative C for example when you can only go so far and then stop? Based on what? How does lake level now and in the future change this definition? Need more details to be able to comment.
Corr. ID: 533 **Organization:** *Not Specified*

Comment ID: 176019 **Organization Type:** Unaffiliated Individual
Representative Quote: Permitting system could work well is folks are aware and it is applied fairly.
Corr. ID: 533 **Organization:** *Not Specified*

Comment ID: 176035 **Organization Type:** Unaffiliated Individual
Representative Quote: Practice adaptive management - if you have problems in any area, do something different.
Corr. ID: 533 **Organization:** *Not Specified*

Comment ID: 176039 **Organization Type:** Unaffiliated Individual
Representative Quote: Licensing of vehicles can be a management mitigation tool.
Corr. ID: 542 **Organization:** Southern Utah Wilderness Alliance

Comment ID: 176111 **Organization Type:** Conservation/Preservation
Representative Quote: Comment: NPS must protect the natural and cultural resources of the NRA, and thus, must take a hard look at the impact of the more than 300 miles of unpaved routes in the NRA. The scoping brochure includes only an alternative to consider prohibiting ATV use on these unpaved routes, however, the brochure does not include an alternative that would evaluate the impacts of general motor vehicle use on these unpaved routes and consider closure of some/all of these routes to protect the natural and cultural resources of the NRA. Such an alternative must be considered.
Corr. ID: 542 **Organization:** Southern Utah Wilderness Alliance

Comment ID: 176133 **Organization Type:** Conservation/Preservation
Representative Quote: These significant impacts include:

- Climate effects on disturbances such as fire, insect outbreaks and wind and ice storms are very likely important in shaping ecosystem structure and

function;

- Grasslands will transform into woody shrub lands with reduced capacity for water absorption and greater vulnerability to channelization and erosion;

- Droughts early in the 21st Century are likely to increase rates of perennial plant mortality in arid lands, accelerate rates of erosion and create opportunities for exotic plant invasions;

- Proliferation of non-native annual and perennial grasses are virtually certain to predispose sites to fire. The climate-driven dynamics of the fire cycle is likely to become the single most important feature controlling future plant distribution in U.S. arid lands;

Climate change is likely to result in shrinking water resources and place increasing pressure on montane water sources to arid land rivers, and increase competition among all major water depletions in arid land river and riparian ecosystems;

- Major disturbances like floods and droughts that structure arid land river corridors are likely to increase in number and intensity (with associated increases in erosion and native plant loss);

- Land use change, increased nutrient availability, increasing human water demand and continued pressure from exotic species will act synergistically with climate warming to restructure the rivers and riparian zones of arid lands;

- Climate change will increase the erosive impact of precipitation and wind;

- Surface soils will become more erodible;

- Increases in wind speed and gustiness will likely increase wind erosion.

The report also notes that

[g]iven that many organisms in arid lands are near their physiological limits for temperature and water stress tolerance, slight changes in temperature and precipitation ... that affect water availability and water requirements could have substantial ramifications for species composition and abundance, as well as the ecosystem goods and services these lands can provide for humans.

Id. at 9. While these findings are dramatic, the report further notes that "[i]t is likely that these changes will increase over the next several decades in both frequency and magnitude, and it is possible that they will accelerate." Id. at 23. In light of these consequences, NPS must provide ORV management alternatives that address these effects and minimize their impacts ..

Corr. ID: 542 **Organization:** Southern Utah Wilderness Alliance

Comment ID: 176112 **Organization Type:** Conservation/Preservation

Representative Quote: Comment: NPS must fully assess the potential environmental consequences of its ORV management decisions, and consider a full range of alternatives. NPS must consider an alternative that combines various elements of Alternatives C and E, and prohibits all motor vehicle use (including A TV use) at Lone Rock Beach, the Lone Rock Beach "play" area, and all of the 12 shoreline areas currently open to motor vehicle use, and prohibits ATV use on all unpaved roads and in the Ferry Swale area - an alternative that provides more protection of the resources than the five alternatives described in the scoping brochure. (Footnote: It should be noted that Canyonlands and Capitol Reef National Parks, adjacent to Glen Canyon NRA, prohibit ATVs (including street legal ATVs) from driving on park roads.) In addition, NPS must consider an alternative that would prohibit all motor vehicle use from routes that connect to closed routes in the Grand

Staircase Escalante National Monument (purple Hills Fourmile Bench area) and routes that connect to controversial trails in areas proposed for wilderness designation on BLM lands managed by the Richfield and Monticello BLM offices. (Footnote: The connecting routes on BLM land are currently being challenged in a lawsuit pending in federal district court, Southern Utah Wilderness Alliance v. Dept. of the Interior, 1:10-cv-01930-RMU.) These routes are identified and labeled on the map at Attachment 1.

AL5075 - Suggestions for Fees

Concern ID: 27367

CONCERN STATEMENT: Commenters suggested that ORV users should pay fees to help fund the maintenance of the roads and implement the ORV management plan.

Representative Quote(s): **Corr. ID:** 2 **Organization:** *Not Specified*

Comment ID: 174695 **Organization Type:** Unaffiliated Individual

Representative Quote: Any ORV use requires mitigation and that mitigation should be funded by ORV users.

Corr. ID: 39 **Organization:** Blue Ribbon Coalition

Comment ID: 175171 **Organization Type:** Unaffiliated Individual

Representative Quote: If the trails and roads are in need of maintenance, consider charging higher fees to enter these areas or sell stickers that can be placed on the OHVs and utilize those funds for trail maintenance.

Corr. ID: 224 **Organization:** *Not Specified*

Comment ID: 173506 **Organization Type:** Unaffiliated Individual

Representative Quote: User fees on ORV's sufficient to fully fund comprehensive monitoring and enforcement of closures and restrictions, and mitigation of all damages caused by illegal ORV use.

Corr. ID: 358 **Organization:** NRDC, Sierra C. , Nat'l Parks Con.

Comment ID: 175009 **Organization Type:** Unaffiliated Individual

Representative Quote: I believe ORV's should fund their own private recreation areas. Other recreation using vehicles, ski's, skates, all have to pay to play and so should they.

Corr. ID: 532 **Organization:** *Not Specified*

Comment ID: 175997 **Organization Type:** Unaffiliated Individual

Representative Quote: Include permit for fee use areas or routes

AL5095 - Open Specific Routes

Concern ID: 27368

CONCERN STATEMENT: Several commenters suggested numerous routes that they believe should be open to ORV use.

Representative Quote(s): **Corr. ID:** 16 **Organization:** *Not Specified*

Comment ID: 174923 **Organization Type:** Unaffiliated Individual

Representative Quote: The first is the Rincon Road that travels north from the Hole in the Rock Trail (Rd. 450), arriving approximately 7.2 miles later at the shore of Lake Powell at the Rincon. This provides a challenging drive to a beautiful and historical setting.

Corr. ID: 16 **Organization:** *Not Specified*

Comment ID: 174929 **Organization Type:** Unaffiliated Individual

Representative Quote: This provides proof that the Rincon Road has been in existence for several decades. With minimal maintenance it is still drivable today. All it needs is a route number post and a sign indicating the need to carry and use a portable toilet when camping on the shore of the lake.

Corr. ID: 28 **Organization:** *Not Specified*

Comment ID: 174988 **Organization Type:** Unaffiliated Individual

Representative Quote: The existing roads such as Crosby Canyon and Alstrom Point have existed for years. There has been minimal off road use in that time. Simply mark the areas not designated for use better and allow current or even relaxed use by both ATV and larger vehicles. Don't allow environmentalists based in the East to dictate how to enjoy responsibly Glen Canyon.

Corr. ID: 60 **Organization:** self

Comment ID: 175347 **Organization Type:** Unaffiliated Individual

Representative Quote: The Mormon Trail / Hole in the Rock Road has a continual historic motorized use from the 1950's when Black Oil Company improved the historic wagon road with the use of Bulldozers. The Mormon Trail / Hole in the Rock Road The Rincon Road was constructed by Bulldozers prior to the designation of Glen Canyon NRA thus the Road should remain open to motorized use all the way to the shores of Lake Powell.

Corr. ID: 65 **Organization:** *Not Specified*

Comment ID: 175371 **Organization Type:** Unaffiliated Individual

Representative Quote: ATV should be allowed in warm creek area

Corr. ID: 83 **Organization:** Self

Comment ID: 171886 **Organization Type:** Unaffiliated Individual

Representative Quote: None of these alternatives address routes like the Flint Trail from Hite crossing to Hans Flat or Sunshine pass to Hatch Canyon going to the Dirty Devil river. To do most routes in the recreation area you would need a Street Legal ATV and that eliminates most (if not all) ATV/ORV users.

Corr. ID: 99 **Organization:** Tri-State ATV Club (Hurricane, UT)

Comment ID: 172003 **Organization Type:** Unaffiliated Individual

Representative Quote: I am a tax paying citizen, and my taxes help pay for the Glen Canyon recreation areas. I am 82 years old and I have been riding in Southern Utah for about 12 years. I recommend that you open the roads in Orange Cliffs, Hole in the Rock, and the other Glen Canyon areas to ATV's, because none of your plans really fit our needs as ATV riders.

Corr. ID: 113 **Organization:** Public Lands Equal Access Alliance (PLEAA)

Comment ID: 172169 **Organization Type:** Unaffiliated Individual

Representative Quote: Proposal

We propose that Glen Canyon Recreation Area, open to ATV's non-street legal and street legal the following route, Flint Trail from Hite crossing to Hans Flat route 633, Sunshine pass to Hatch Canyon going to the Dirty Devil River route 730. Route 731 to the big Ridge, route 763 to Panorama Point, routes 774/775 to Cleopatra's Chair, route 450 Hole in the Rock Trail, route 330 Hole in the rock trail, Route 777 Orange Cliffs, and route 651 Blue Notch Canyon. These routes are in areas that the terrain requires that you

stay on the route. These routes are not passable by most vehicles. Most of these routes are in areas that are remote and are very hard to maintain. Please do not try to ban the public from accessing the great scenic and historic areas that have been placed in your care.

Corr. ID: 312 **Organization:** *Not Specified*

Comment ID: 174691 **Organization Type:** Unaffiliated Individual

Representative Quote: Open Bullfrog North and South to ATV use, in addition to Alternative A.

I am an avid, frequent Lake Powell boater and ATV rider. It would be simply wonderful to have a combo vacation more available than going all the way to Wahweap. I didn't see any options that actually expanded ATV use, which I think would be more fair. Lacking that, alternative A seems to be the best.

Corr. ID: 337 **Organization:** *Not Specified*

Comment ID: 174803 **Organization Type:** Unaffiliated Individual

Representative Quote: I would like the new Management Plan to consider re-opening the Rincon trail and perhaps even extending the trail all the way down to the water's edge.

Corr. ID: 454 **Organization:** SPEAR (Sanjuan Public Entry and Access Rights)

Comment ID: 175831 **Organization Type:** Unaffiliated Individual

Representative Quote: Some roads were omitted in the travel plan shown us by your staff. Some of the omitted roads that we believe are important to our user group include the Rincon Road, and the roads leading to the recreation area in Bull and Imperial Valley, Good Hope Bay and Muley Point areas. The road from Blue Notch and up Red Canyon as shown on your map is mostly under water when the lake is high. A user developed road above the high water line would be the proper route for this road to continue in existence. The County has GPSed this route and they will present in on their map

Corr. ID: 459 **Organization:** Escalante Chamber of Commerce

Comment ID: 175843 **Organization Type:** Unaffiliated Individual

Representative Quote: I am writing in support of keeping Hole-In-The-Rock Road open for ATV use.

As a business owner in Escalante, Hole-In-The-Rock Road (HITRR) visitors make up 60% of the visitors to Escalante. Those guests sleep, eat and buy memories of their trip. Many of those visitors are here because of the historic nature of HITRR. This group of visitors is the life-blood of Escalante business and limiting access in any way will negatively impact the community.

Due to the lack of consistent maintenance by Kane County, street legal ATV's are now the safest way to explore HIRRR and several Jeep and ATV rental companies have been created and are growing business for the entire town. Their efforts have helped the tourist economy immensely, keeping folks overnight who might have traveled on to other national parks.

In addition, Utah Legislature passed Senate Joint Resolution No 1 in spring of 2010. This recognizes the historic nature of the road, the last wagon train, the connection to San Juan County, and calls for UDOT to spend \$200,000 in a study to make HITRR an all-weather road.

In addition, a group of citizens have recently updated the Tour Guide of Historic Escalante Homes, and is working towards Historic District Designation during 2011. HITRR plays a significant role in that story.

Please do not close off access to HITRR by street legal ATV's. I understand the need to prevent cross-country usage and support that effort by the various land management agencies. There are hundreds of miles of open trails available to ORV's and allowing cross-country adventures is not in the best interest of protecting the resources within the park.

Corr. ID: 469 **Organization:** *Not Specified*

Comment ID: 175873 **Organization Type:** Unaffiliated Individual

Representative Quote: The Hole in the Rock road is very important to our local economy, restricting any motorized use would be harmful. The Hole in the Rock has a great historical value. I believe any and all should have the right to visit this wonderful site. Here in Escalante we have started the Hole in the Rock Heritage Center. This will be a visitor center designed to tell the history of the Hole in the Rock adventure. Once people have stopped at the visitor center they will want to take a day trip to the actual site. I do not believe that we should restrict OHV use along this road.

Corr. ID: 470 **Organization:** Bureau Of Land Management

Comment ID: 175880 **Organization Type:** Federal Government

Representative Quote: Travel management:

The Richfield BLM would like the GCNRA to consider managing roads found in the GCNRA GMP, which travel onto BLM managed lands in a manner consistent with the BLM. More specifically; two roads near Happy Canyon currently allow motorized access to BLM, GCNRA and state land sections. The BLM identified, evaluated and designated the BLM managed sections of these roads as open for motorized use. However, both of these roads are dead end roads, requiring visitors to travel through GCNRA to access the sections of roads designated as open in the Richfield travel plan. Some coordination between Glen Canyon and the BLM occurred during the BLM travel designation process completed in 2008. After review of the map provided at the Escalante open house, it did not seem as if these two roads were represented. GCNRA staff said they would forward the BLM the road shapefiles to confirm the GCNRA GMP roads match up with the BLM route designations. The BLM has not yet received these shapefiles.

Corr. ID: 470 **Organization:** Bureau Of Land Management

Comment ID: 175882 **Organization Type:** Federal Government

Representative Quote: Five open routes on GSENM's travel management plan cross onto GCNRA: Hole-in-the-Rock Road, Grand Bench Road, Croton Road, Smoky Mountain Road, and Smoky Hollow Road. The Monument requests that designated use of those routes be consistent across agency boundaries. This will help minimize confusion for the traveling public, simplify law enforcement efforts for both agencies, and eliminate potentially dangerous situations where the visitor may not have enough fuel to turn around and go all the way back through the Monument

Corr. ID: 479 **Organization:** ExpeditionUtah.com

Comment ID: 175898 **Organization Type:** Unaffiliated Individual

Representative Quote: First and foremost we feel it is fundamental that the NPS recognize several historic and important routes within the Recreation Area boundary. First and foremost is the Rincon Trail which spurs off of the Hole in the Rock Trail (Road# 450). This trail has been used by motorized vehicles for over 50 years, we feel this is a very scenic and valuable addition to the HITR Trail. This route allows optional camping, picnicking and sight-

seeing opportunities away from the often crowded Road# 650.

The second route is the road that connects Red Canyon Road (Road# 650) and Blue Notch Canyon (Road# 651). The area is flush with roads from the heavy mining activity that marked its past. One particular route connects the Red Canyon Road and Blue Notch Canyon and is accessible at times the level of Lake Powell is below approximately 3650. Given the loop opportunity of this route as well as its historic access, we feel it is crucial that this route be added to the inventory of motorized routes within the Recreation Area.

Lastly, the NPS current motorized travel maps are missing routes in the Imperial Valley Area. We feel that these spur routes and loops are very important to the recreation opportunities in the area. The Imperial Valley Area is a remote and seldom visited area compared to many other routes within the Recreation Area, user impacts on these routes are minimal at best and historic access should be recognized and invited.

Corr. ID: 505 **Organization:** *Not Specified*

Comment ID: 176115 **Organization Type:** Unaffiliated Individual

Representative Quote: I would like to point out several important road segments that are missing from the ORV Plan.

1. THE RINCON ROAD (See Map Attachments A.1 ' A.3): This road is a spur off of the Hole in the Rock Trail (A.1), departing in a northward direction at 37.2455* N 110.7682*W (A.2). The trail continues in a northward direction for about 3 miles, dropping off of Wilson Mesa down into the Rincon, where it continues another mile or so, eventually ending where it meets the waters of Lake Powell. The trail terminates at approximately 37.3032*N 110.7795*W (A.3). This road should be included on the ORV Plan as a motorized route. This road should be designated as open to ATVs for the same reasons included in "Unpaved Roads" "Hole in the Rock Trail" as described above.

2. Imperial Valley Trails (See Map Attachments B.1 ' B.2): There are two segments in the Imperial Valley area that are not included on the ORV Plan map. The first segment completes a loop starting at 38.0309*N 110.0232*W, heads southeast for about 1.5 miles and ends at 38.028*N 110.0115*W where it meets up with the other end of the loop at the Monticello BLM Field Office Border (B.1). The second segment is a dead end spur that begins at 38.0151*N 110.0234*W in Bull Valley departing in a southwesterly direction, eventually turning south and dead ends in approximately 2 miles at 37.9982*N 110.0222*W (B.2). I have also included the same routes drawn onto a Monticello BLM Designated Routes Map to show how the routes mesh with their counterparts on the BLM side of the border. These routes should be designated as open to ATVs for the same reasons included in "Unpaved Roads" ' Imperial Valley Area" as described above.

3. Blue Notch! Red Canyon: It appears from the maps on your alternatives that the motorized route between Blue Notch and Red Canyon is included as an open route (to conventional vehicles and/or ATV5 per the various alternatives). However, the ORV Plan maps are not detailed enough nor clear enough to be certain. It should be noted that at low lake levels, this route makes for a popular multi-day loop route down to the lake. When the lake is full, this route is flooded and is not passable. Please leave this route open and clarify on your ORV Plan that, when the lake level is low enough, the route is open and legal for travel, whether by conventional motor vehicles or ATVs as dictated by the final ORV Plan

designation.

Corr. ID: 505

Organization: *Not Specified*

Comment ID: 176113 **Organization Type:** Unaffiliated Individual

Representative Quote: Imperial Valley area:

2. The Imperial Valley area of GCNRA is extremely remote and rugged. The BLM roads used to access this area are extremely rugged and rough. There are two access routes. One via Bull Valley! Imperial Valley. This route is suitable for high clearance 4wd vehicles, but is extremely rough at that. The other is through Cross Canyon via a road segment named "Impossible Hill" by the 4x4 crowd. This second route is beyond the capabilities of all except the most heavily modified 4x4 vehicles. Using APIs to access this area is the only option to many public land users since most people do not have access to the kinds of full- sized 4x4 vehicles that are required to traverse the access roads. Also, Imperial Valley is extremely remote. Most vehicles consume nearly all their fuel simply accessing the area. It is nearly a 4 hour drive on dirt roads back to the nearest fuel station, which is overpriced (\$5 per gallon this last October) and is only open seasonally, It is an additional hour or more to the nearest reliable, affordable fuel in either Moab or Monticello. Most 4x4s carry 1 or 2 jerry cans of reserve fuel before heading into this backcountry area. But even at that, it is not enough fuel for a full exploration of the area. The best way to explore the entire Imperial Valley area is to tow ATVs with a conventional 4x4 into the Beef Basin area on BLM lands adjacent to Imperial Valley, set up a base camp there, and explore deeper into Imperial Valley by ATV. When I was in the area in October of this year. The only tracks I saw on the roads were those of ATVs. Don't close this route to ATV5, it is the only way most people will ever see the area.

Corr. ID: 514

Organization: *Not Specified*

Comment ID: 175260 **Organization Type:** Unaffiliated Individual

Representative Quote: would urge the NPS to relook at the 1995 Back Country Management Plan for Canyonlands National Park and the Orange Cliffs to allow ORV/ATVs to use the unpaved roads in these areas as well so that management is more consistent throughout the NRA.

Corr. ID: 520

Organization: *Not Specified*

Comment ID: 176093 **Organization Type:** Unaffiliated Individual

Representative Quote: My Preferred Alternative would be Alternative A with the following amendments: 1) Existing connecting routes with BLM & Navajo roads are acknowledged as roads and designated for general travel and as ORV routes, 2) existing roads and routes commonly in use are identified and acknowledged as roads and added to the 1979 GMP roads inventory, 3) "roads" currently in use, but not identified in the 1979 GMP, will remain open and not closed, removed, or designated as "administrative use only", 4) all existing GMP roads will be maintained to a minimal, passable, standard.

Corr. ID: 531

Organization: *Not Specified*

Comment ID: 175975 **Organization Type:** Unaffiliated Individual

Representative Quote: Need to consider creating a loop trail for the Hole-in-the-Rock eastern access point up to Hall's Crossing or other connecting point via barge/ferry or other similar mechanism.

Corr. ID: 531

Organization: *Not Specified*

Comment ID: 175985 **Organization Type:** Unaffiliated Individual

Representative Quote: Would like to be able to ride to places like Needles Overlook on 4-wheeler. Good for older folks.

Corr. ID: 531

Organization: *Not Specified*

Comment ID: 175971 **Organization Type:** Unaffiliated Individual
Representative Quote: Hog Springs Road needs to stay open - off of Routes 276/95 junction area (note: this is BLM road).
Corr. ID: 531 **Organization:** *Not Specified*

Comment ID: 175982 **Organization Type:** Unaffiliated Individual
Representative Quote: Pioneer Trail on top of Gray Mesa was travelled prior to NPS closure. Part of the cultural is to travel on the roads that were used by pioneers.
Corr. ID: 531 **Organization:** *Not Specified*

Comment ID: 175969 **Organization Type:** Unaffiliated Individual
Representative Quote: There are well-established roads at Warm Springs Creek, 7-Mile Creek, Smith Fork. Will these remain open? What kinds of vehicles? Commenter is interested in using SUVs, etc. There are county roads on Ticaboo Mesa.
Corr. ID: 531 **Organization:** *Not Specified*

Comment ID: 175968 **Organization Type:** Unaffiliated Individual
Representative Quote: Trail reroute should be created at Red Canyon to allow for a complete loop trail through to Blue Notch when the water level is high.
Corr. ID: 531 **Organization:** *Not Specified*

Comment ID: 175970 **Organization Type:** Unaffiliated Individual
Representative Quote: There are roads in the Escalante River area off of Hole-in-the-Rock e.g. 40 Mile Road, that should be open. Clear Creek, Davis Gulch, and 50-Mile Roads.
Corr. ID: 532 **Organization:** *Not Specified*

Comment ID: 176001 **Organization Type:** Unaffiliated Individual
Representative Quote: Purple Hill Spur Road should be reopened/corrected as closed road (GMP).
Corr. ID: 533 **Organization:** *Not Specified*

Comment ID: 176023 **Organization Type:** Unaffiliated Individual
Representative Quote: Consider opening non-paved roads in Orange Cliffs to ATV use (not just street-legal).

AL5097 - ORVs not appropriate in all areas

Concern ID: 27369

CONCERN STATEMENT: Many commenters stated that ORV use within the NRA is acceptable, but not in all locations, and that management is crucial for protecting certain resources.

Representative Quote(s): **Corr. ID:** 54 **Organization:** *Not Specified*

Comment ID: 175271 **Organization Type:** Unaffiliated Individual
Representative Quote: There are many areas that are already closed to ATV usage. I do support having some wilderness areas where motorized vehicles are not used but it's also very important to keep some areas open to ATVs.
Corr. ID: 64 **Organization:** *Not Specified*

Comment ID: 175368 **Organization Type:** Unaffiliated Individual
Representative Quote: ATV & ORV should be prohibited from operating in and around the units camping along the shoreline. ATV & ORV should be confined to the hill, above the cable, west of the beach.
Corr. ID: 65 **Organization:** *Not Specified*

Comment ID: 175373 **Organization Type:** Unaffiliated Individual
Representative Quote: ATV on a trail loop system. All cannot afford a houseboat.

Corr. ID: 350 **Organization:** *Not Specified*

Comment ID: 174962 **Organization Type:** Unaffiliated Individual
Representative Quote: You are tasked with creating an off-road vehicle plan for the GCNRA. We need to effectively manage this area. It is appropriate for ORV use in the GCNRA. It is not reasonable for ORV access any dirt route in the GCNRA. Let's create reasonable routes that balance the needs of some ORV access, protection of fragile natural environments, those that want a non-motorized alternative in the GCNRA and the preservation of this incredible natural area highly prized by many with a variety of interests.

Corr. ID: 351 **Organization:** Maryland Ornithological Society

Comment ID: 176052 **Organization Type:** Unaffiliated Individual
Representative Quote: Regulate Off-road Vehicles
We do not categorically object to ORVs. Many MOS members own ORVs and use them to visit birding areas, which often are accessible only by rough roads. We rely on land-managing agencies to advise us, through regulations and closures, which routes are not suitable for ORVs because of potential damage to the land and to wildlife habitat. We want the agencies to make protection of the habitat a high priority.

Corr. ID: 361 **Organization:** *Not Specified*

Comment ID: 175043 **Organization Type:** Unaffiliated Individual
Representative Quote: Once land is destroyed, it's destroyed. It seems to me that the NPS as well as the Forest Service don't show a real concern for the land which you are suppose to "manage" not destroy.

I strongly feel that the NPS needs to do a serious study as to how much damage ATV's and ORV's (one in the same to me) will do on our land. If you can determine that ATV's and/or ORV's will not affect the natural and/or scenic areas then perhaps I can agree to opening areas (hopefully, areas that are out of the public's view).

Corr. ID: 410 **Organization:** *Not Specified*

Comment ID: 175706 **Organization Type:** Unaffiliated Individual
Representative Quote: When considering the various alternatives for ATV/ORV management, I believe that protecting the natural resources of the Glen Canyon NRA should be a priority. Any management plan chosen should be designed to contain ATV/ORV activity to a portion of the established network of roads in the GCNRA. The impacts to wildlife and wildlife habitat, the fragile soil of the region, water quality, prehistoric cultural sites, and the quiet solitude of this area are too great to allow complete utilization of unpaved roads and any off-road motorized recreation. All vehicles, including ATVs, ORVs, and dirt bikes, should be restricted to appropriate areas within the existing 300-mile long road system, and these vehicles should be licensed.

Corr. ID: 448 **Organization:** *Not Specified*

Comment ID: 175819 **Organization Type:** Unaffiliated Individual
Representative Quote: ORVs should not be allowed near water because they pollute the water and cause excessive erosion.
The current road system provides adequate and sensible access and nearby BLM lands provide for ORV travel.

Corr. ID: 476 **Organization:** Sierra Club

Comment ID: 175892 **Organization Type:** Unaffiliated Individual

Representative Quote: Therefore, your management plan should limit access by illegal OHV destroyers. You should NOT permit any uses that you cannot manage effectively. The first priority is to protect our natural resources; recreational groups with a history of destructive behaviors must not be allowed to further compromise our public lands; they have forfeited the privilege. You should give preferential access to recreationists that do not destroy our resources. You should restrict completely OHV off road travel.

You will be challenged to maintain and enforce a simple rule: NO USE OF VEHICLES OFF ROADS. Note that this is now a common policy of all the National Forests in Region 3.

Corr. ID: 542 **Organization:** Southern Utah Wilderness Alliance

Comment ID: 176124 **Organization Type:** Conservation/Preservation

Representative Quote: Comment: SUWA specifically requests that NPS prohibit all motorized use, including ATV use, in riparian area and watersheds in order to protect these valuable resources.

AL6000 - Alternatives: Alternative A

Concern ID: 27370

**CONCERN
STATEMENT:**

Commenters suggested new elements that could be added to alternative A, such as: providing equal opportunity to all users, adequately addressing the growing needs of motorized recreationists, and allowing non-street legal vehicles more access.

Representative Quote(s): **Corr. ID:** 14 **Organization:** Capital Trail Vehicle Association

Comment ID: 175908 **Organization Type:** Unaffiliated Individual

Representative Quote: There is nothing radically wrong with the existing condition except that it does not meet all of the needs of motorized recreationists, does not provide equal opportunity, and does not adequately address the growing needs of motorized recreationists. These are the supreme issues that this action must address. The evaluation and proposal must adequately address these three issues and the predisposition to motorized closures must be avoided. The proposed action must meet the needs of motorized recreationists both today and tomorrow. We respectfully request that the evaluation and proposal be directed to adequately address these issues and goals.

Corr. ID: 69 **Organization:** Tri-State ATV Club

Comment ID: 175382 **Organization Type:** Unaffiliated Individual

Representative Quote: Alternative A: The Orange Cliff Area - why are 3-4,000 lb vehicles w/40lbs of tire pressure allowed when an OHV which weighs less than 1,000 lbs and has less than 10 lbs of tire pressure and would have far less impact on the environment not allowed?

Why do you consider a street legal machine only - does it have less impact than a machine that doesn't have a license plate?

Concern ID: 27439

**CONCERN
STATEMENT:**

One commenter asked whether alternatives B or D may be a better choice than alternative A, if alternative A will require additional resources in order to prevent a lawsuit.

Representative Quote(s): **Corr. ID:** 310 **Organization:** Not Specified

Comment ID: 174690 **Organization Type:** Unaffiliated Individual

Representative Quote: Alternative A should be considered as a viable

alternative, as it should reduce costs of patrolling the area for unauthorized access.

If alternative A is chosen, would additional resources be needed to prevent a lawsuit? If so, would Alternative B or D be a better alternative?

Concern ID: 27440

**CONCERN
STATEMENT:**

One commenter suggested that if alternative A is chosen, the NRA should continue to coordinate with the BLM Monticello Field Office.

Representative Quote(s): **Corr. ID:** 470 **Organization:** Bureau Of Land Management

Comment ID: 175874 **Organization Type:** Federal Government

Representative Quote: If Alternative A is selected, we request that GLCA continue to coordinate with the MFO on consistent interpretive signage and boundary marking procedures. The MFO is interested in developing coordinated efforts to produce interpretive and educational materials that help to clarify the similarities and differences in our mandates and management direction across our respective boundaries. Of particular concern and need is the development of consistent messaging related to the definition of a "street-legal ATV." The MFO is also interested in embodying this information in our official travel management maps that will eventually be available both electronically and in a hard-copy format.

AL7000 - Alternatives: Alternative B

Concern ID: 27371

**CONCERN
STATEMENT:**

One commenter suggested that if alternative B is chosen, the NRA should continue to coordinate with the BLM Monticello Field Office.

Representative Quote(s): **Corr. ID:** 470 **Organization:** Bureau Of Land Management

Comment ID: 175875 **Organization Type:** Federal Government

Representative Quote: If Alternative B is selected, we request that GLCA continue to coordinate with the MFO on consistent interpretive signage and boundary marking procedures in the vicinity of GMP roads. The MFO is interested in developing coordinated efforts to produce interpretive and educational materials that help to clarify the similarities and differences in our mandates and management direction across our respective boundaries. Of particular concern and need is the development of consistent messaging related to the definition of a "conventional vehicle." The MFO is also interested in embodying this information in our official travel management maps that will eventually be available both electronically and in a hard-copy format.

AL8000 - Alternatives: Alternative C

Concern ID: 27372

**CONCERN
STATEMENT:**

One commenter suggested that if alternative C is chosen, the NRA should continue to coordinate with the BLM Monticello Field Office.

Representative Quote(s): **Corr. ID:** 470 **Organization:** Bureau Of Land Management

Comment ID: 175876 **Organization Type:** Federal Government

Representative Quote: If Alternative C is selected, we request that GLCA

continue to coordinate with the MFO on consistent interpretive signage and boundary marking procedures in the vicinity of GMP roads. Selection of this alternative would result in changes to traditional access routes and use patterns along several trans-boundary routes, including several routes that have been traditionally used during the annual San Juan ATV Safari. These routes include Johns Canyon (GMP Road # 456) and Blue Notch Canyon (GMP Road # 651). Other trans-boundary routes, that may require additional signage, education, and enforcement efforts would include Hole in the Rock Road (GMP Road # 450), Muley Point (GMP Road # 431), Clay Hills Crossing (GMP Road # 430), and Red Canyon (GMP Road # 650). Enforcement of a "no ATV" policy along these routes would require a sustained education and enforcement effort. The MFO is interested in developing coordinated efforts to produce interpretive and educational materials that help to clarify the similarities and differences in our mandates and management direction across our respective boundaries. The MFO is also interested in embodying this information in our official travel management maps that will eventually be available both electronically and in a hard-copy format.

AL9000 - Alternatives: Alternative D

Concern ID: 27373

CONCERN STATEMENT: Commenters suggested that alternative D should only be considered with these stipulations: require fees for ORV users, all roads or areas where ORV use is limited beyond current use must be offset with a new road or ORV area, beach access via ORV for individuals with disabilities must be provided, and unlicensed ORVs will be allowed except where prohibited by local law.

Representative Quote(s): **Corr. ID:** 2 **Organization:** Not Specified

Comment ID: 174696 **Organization Type:** Unaffiliated Individual

Representative Quote: I urge for the adoption of Off Road Management Plan Alternatives D or E. Alternative D should only be considered if there is some way to require fees of ORV users so that the mitigation of damages created by ORV can be properly funded by the same people causing the damage.

Corr. ID: 503 **Organization:** Kanab City Council

Comment ID: 176151 **Organization Type:** Town or City Government

Representative Quote: The only alternative we support is Alternative D: Mixed Use and this support is contingent on the following conditions:
) All roads or areas where ORV use is limited by Alternative D beyond current use must be offset with a new road or ORV area where such use is allowed after appropriate study. Until such alternatives are available, ORV access will continue to be allowed
 b) Beach access via ORV for individuals with disabilities must be allowed and consistent with a 503 504 plan;
 c) Unlicensed ORVs will be allowed except where prohibited by local law.

Concern ID: 27444

CONCERN STATEMENT: One commenter suggested that the NRA not close any of the ORV accessible shorelines under alternative D.

Representative Quote(s): **Corr. ID:** 16 **Organization:** Not Specified

Comment ID: 174936 **Organization Type:** Unaffiliated Individual

Representative Quote: Please do not close any of the ORV accessible shoreline areas in Alternative D. Well over 1000 miles of non ORV accessible shoreline will remain for boaters' exclusive use. A mere 12 vehicle access points on a lake this size will still make it easy for boaters to avoid the non-boating public, if they desire. Glen Canyon NRA is managed to ". . .provide for public outdoor recreation use and enjoyment of Lake Powell and lands adjacent thereto. . ." Boats are a big investment that most people can't afford. Renting one from Aramark isn't much cheaper. A lot more of the public can afford a 4x4 SUV that can access these 12 locations and be used as daily transportation when not being used to recreate in GCNRA.

Concern ID: 27445

CONCERN STATEMENT: One commenter suggested that if alternative D is chosen, the NRA should continue to coordinate with the BLM Monticello Field Office.

Representative Quote(s): **Corr. ID:** 470 **Organization:** Bureau Of Land Management

Comment ID: 175877 **Organization Type:** Federal Government

Representative Quote: If Alternative D is selected, we request that GLCA continue to coordinate with the MFO on consistent interpretive signage and boundary marking procedures in the vicinity of GMP roads. Since selection of this alternative would allow use of street-legal ATVs and conventional vehicles along the Hole in the Rock Trail, the MFO requests that GLCA work with the MFO on a cooperative management plan for this important and increasingly popular historic resource. Other routes of concern (that would be closed to all vehicular use under this alternative) include several routes that have been traditionally used during the annual San Juan ATV Safari. A number of routes on adjacent BLM lands have been used as San Juan ATV Safari routes through the issuance of a BLM Special Recreation Permit. These routes exist in the vicinity of Johns Canyon (GMP Road # 456) and Blue Notch Canyon (GMP Road # 651). Other trans-boundary routes, that may require additional signage, education, and enforcement efforts would include Muley Point (GMP Road # 431), Clay Hills Crossing (GMP Road # 430), and Red Canyon (GMP Road # 650). The MFO is interested in developing coordinated efforts to produce interpretive and educational materials that help to clarify the similarities and differences in our mandates and management direction across our respective boundaries. The MFO is also interested in embodying this information in our official travel management maps that will eventually be available both electronically and in a hard-copy format.

CC1000 - Consultation and Coordination: General Comments

Concern ID: 27374

CONCERN STATEMENT: Several commenters suggested that the public scoping meetings were either poorly advertised or held in inappropriate locations. Further, commenters suggested that the NPS did not consult with the appropriate agencies, organizations, or groups.

Representative Quote(s): **Corr. ID:** 70 **Organization:** Not Specified

Comment ID: 175390 **Organization Type:** Unaffiliated Individual

Representative Quote: I demand you hold public hearings in areas that represent the demographics of the visitors to GCNRA. Page, Blanding,

Escalante, Kanab, Flagstaff and 2 areas on the Indian Reservations???!!!. I'd be shocked if the combined visitors to Lake Powell from these areas exceed 5% of the total. Extend the deadline for public comment, schedule meetings in nearby major cities (Phoenix, Salt Lake, Grand Junction, St. George, Denver, Los Angeles) so that you can get feedback from the people who use Lake Powell. Your current system for notifying the public is farcical.

Corr. ID: 71 **Organization:** *Not Specified*

Comment ID: 175392 **Organization Type:** Unaffiliated Individual

Representative Quote: Why is it that you always conduct your public hearings in the areas where you will encounter the least possible public opposition to your pre-conceived plans??

Corr. ID: 74 **Organization:** *Not Specified*

Comment ID: 175409 **Organization Type:** Unaffiliated Individual

Representative Quote: And WHY aren't you holding 'meetings' in areas where the people might actually be affected?

Corr. ID: 107 **Organization:** Bushman Web Service

Comment ID: 172168 **Organization Type:** Unaffiliated Individual

Representative Quote: Working in conjunction with our affiliated OHV groups we have found that in this Planning and Scoping process that the management of the Glen Canyon National Recreation area has NOT worked with the OHV section of the State of Utah nor involved the OHV clubs, organizations and public community in the State of Utah. We feel this plan in its current form does not appear to be an Off-Road Vehicle Management Plan but rather an Off-road vehicle elimination plan. Glen Canyon is a National Recreation area; Off-road vehicles are a legitimate form of recreation on public lands.

Corr. ID: 468 **Organization:** *Not Specified*

Comment ID: 175867 **Organization Type:** Unaffiliated Individual

Representative Quote: Do not feel that the scoping meeting was advertised well enough. The citizens that I spoke to about the scoping process was unaware that there was a scoping.

Corr. ID: 469 **Organization:** *Not Specified*

Comment ID: 175870 **Organization Type:** Unaffiliated Individual

Representative Quote: I feel that not many of our local citizens were informed that the scoping process was even taking place. I was informed just an hour before the open house was held in Escalante. This concerns me greatly. As the Mayor of Escalante I feel I should of had a personal invite along with members of our city council to the open house held here in our community.

Corr. ID: 469 **Organization:** *Not Specified*

Comment ID: 175872 **Organization Type:** Unaffiliated Individual

Representative Quote: I feel that we need to study the alternatives longer and inform the local public better.

Corr. ID: 510 **Organization:** ATVUtah

Comment ID: 176243 **Organization Type:** Business

Representative Quote: Working in conjunction with our affiliated OHV groups we have found that in this Planning and Scoping process that the management of the Glen Canyon National Recreation area has NOT worked with the OHV section of the State of Utah nor involved the OHV clubs, organizations and public community in the State of Utah. We feel this plan in its current form does not appear to be an Off-Road Vehicle Management Plan but rather an Off-road vehicle elimination plan. Glen Canyon is a National Recreation area; Off-road vehicles are a legitimate form of

recreation on public lands.

If you have any questions or would like to speak to us, please feel free to contact us.

Corr. ID: 516 **Organization:** Office of the Governor, State of Utah

Comment ID: 175217 **Organization Type:** State Government

Representative Quote: The process for the GMP analysis from this point should address the existence of both state and local government travel plans to assure an accurate accounting and coordination of roads and rights-of-way in the GCNRA. The purpose and need section off the NEP A analysis should include the issues of signage, maintenance, enforcement and transportation planning across these various jurisdictions.

Corr. ID: 531 **Organization:** *Not Specified*

Comment ID: 175967 **Organization Type:** Unaffiliated Individual

Representative Quote: Develop a plan that is consistent with the San Juan County Travel Plan. Do not have inconsistencies in use inside and outside the recreation area as it would be confusing to the ATV operator.

Concern ID: 27447

CONCERN STATEMENT:

Commenters provided suggestions for the Scoping Brochure, such as providing more definitions, preliminary planning issues, and supporting reference material.

Representative Quote(s): **Corr. ID:** 108 **Organization:** *Not Specified*

Comment ID: 172173 **Organization Type:** Unaffiliated Individual

Representative Quote: - I am reluctant to comment on any of your OHV management plans because there is no supporting reference material showing how those plans were developed. I urge you to reconsider your scoping period then develop a clearer scoping document and obtain more outside input before you develop your OHV travel plans. There is no evidence presented that OHV's damage the existing roads of the Recreational Area any more than the many of the other types of vehicles visiting the recreation area. Realistically, the actual impact or footprints of OHV's are lighter than of a horse or what you call a conventional vehicle. When we are riding the unpaved roads within the Recreational Area, we ride our ATV's with one set of our OHV tires in the conventional vehicle tire rut and the opposite OHV tires on the hump in the middle of the road. Little or no damage is done to the road surface by OHV's.

Corr. ID: 463 **Organization:** Utah 4 Wheel Drive Association

Comment ID: 175859 **Organization Type:** Unaffiliated Individual

Representative Quote: The NOI and Scoping Brochure fail to disclose preliminary planning issues developed by the agency's planning team. In addition, this elusive "criteria developed to evaluate ATV use on unpaved roads" on page 9 makes it extremely difficult for the recreating public to offer meaningful public input. U4WDA objects to the development of key decision criteria without the opportunity to comment prior to the development of Draft Alternatives and release of the DEIS. This violates the spirit, if not the letter of NEPA. Providing the public opportunity to comment on issues, management objectives, and decision criteria is the purpose of the Scoping process.

Again, this critical process flaw is relatively easy to remedy in this early stage of the planning process. The agency should "re-scope" the ORV management plan, disclose the preliminary planning issues, decision criteria, management common to all alternatives, etc., and allow for the public to

review and comment. Doing so will allow the public to provide meaningful involvement as mandated by law.

Corr. ID: 463 **Organization:** Utah 4 Wheel Drive Association

Comment ID: 175858 **Organization Type:** Unaffiliated Individual

Representative Quote: Specific Comments on the Scoping Brochure

1. The NOI and Scoping Brochure contains numerous undefined terms making it difficult for the general public to understand the scope of the decision.

The DEIS must include definitions to all terms used in the document, including all terrain vehicle ("ATV"), off-road vehicle ("ORV") and "conventional motor vehicles."

2. The term "management considerations" and the items listed under this section on page 4 of the Scoping Brochure must be clarified prior to the development of Draft Alternatives or the release of the DEIS.

The "Management Considerations" are very confusing. Many of the items listed here seem like planning criteria, decision criteria, sideboards or perhaps "management common to all alternatives." However, not all of the statements in this section are consistent with typical land use planning "sideboards." For example, the third item in this section reads:

"A significant problem identified by the project's interdisciplinary team (IDT) and the public was the lack of clear guidance regarding the regulations governing ORV use in the recreation area."

(Scoping Brochure, page 4, under "Management Considerations") This seems more appropriate as a purpose and need statement, not a "management consideration" or a "planning issue."

Corr. ID: 517 **Organization:** Kane County Commission

Comment ID: 175512 **Organization Type:** County Government

Representative Quote: The quality of the information made available to the public could be improved

While the County addresses this issue via specific requests that the DEIS include clear definition of key terms in other section of these comments, the County wanted to amplify our concern over the quality of the information provided to the public thus far. Public information needs to be improved in order to formulate a defensible ORV management plan. The NOI and other information provided to the public thus far is rife with undefined terms and inadequate discussion regarding key land use planning concepts, such as planning issues, planning criteria, management common to all alternatives, etc.

More specifically, the County is concerned that the general public will not understand the distinction between an ORV Management Plan/EIS and a special regulation (pursuant to 36 CFR 4.10). The public does not understand why a special regulation is necessary or what management options are available via such special regulation. Please consider improving the information made available to the public as you proceed.

Also, important decision criteria that have apparently been discussed behind closed doors in the agency are not disclosed to the public. Apparently, the

agency is discussing developing criteria to evaluate licensed ORV use on unpaved roads. Yet this important decision criterion is not even mentioned in the NOI and given only a passing reference in the Scoping Brochure. Such non disclosure of key decision criteria is not only a violation of the spirit of NEPA, but also serves to poison the public who often are of the opinion that the "decision has already been made" and their input doesn't matter.

Corr. ID: 528 **Organization:** Utah/Arizona ATV Club of Kanab

Comment ID: 175934 **Organization Type:** Unaffiliated Individual

Representative Quote: I recently had the opportunity to review the scoping brochure, after reviewing and reading this document, I have some concerns. This scoping document shows intent to present, unilaterally, three OHV travel plans and to prepare an Environmental Impact Statement in order to choose a final Off-Road Vehicle Management Plan for the recreational area.

I would respectfully offer my opinion and my concerns about that document and your intent in that regard.

- I must admit that I am somewhat confused with your scoping brochure. Some of the points and intentions you cite in the brochure are not referenced and are not clearly defined. In addition, some referenced materials in the brochure do not support some of your conclusions in my opinion.

- One example I found in your scoping brochure is where you show a photo of vehicle tracks where a conventional vehicle left the road and went cross-country leaving deep ruts in the mud. There is no explanation or caption with the photo, as presented and in all probability, the uninformed would assume that those ruts in the mud were caused by an OHV since the issues being presented mostly relate to OHV travel plans. This is grossly unfair to the OHV user and is misleading to the general public.

- I am reluctant to comment on any of your OHV management plans because there is no supporting reference material showing how those plans were developed. I urge you to reconsider your scoping period then develop a clearer scoping document and obtain more outside input before you develop your OHV travel plans. There is no evidence presented that OHV's damage the existing roads of the Recreational Area any more than the many of the other types of vehicles visiting the recreation area. Realistically, the actual impact or footprints of OHVs are lighter than of a horse or what you call a conventional vehicle. When we are riding the unpaved roads within the Recreational Area, we ride our ATV's with one set of our OHV tires in the conventional vehicle tire rut and the opposite OHV tires on the hump in the middle of the road. Little or no damage is done to the road surface by OHV's.

Concern ID: 27448

CONCERN STATEMENT: [One commenter suggested updating the NRA mailing list to reflect that Thomas A. Heinlein is the Field Office Manager for the Monticello Field Office \(BLM\).](#)

Representative Quote(s): **Corr. ID:** 470 **Organization:** Bureau Of Land Management

Comment ID: 175879 **Organization Type:** Federal Government

Representative Quote: Also, please update your mailing list to reflect that I am now the Field Office Manager for the MFO. All future NEPA correspondence may be directed to me at the address listed above.

Thomas A. Heinlein
Monticello Field Office Manager

Concern ID: 27449
CONCERN STATEMENT: One commenter suggested that collaborating with local counties, communities, ORV clubs and individuals will help ensure a world class ORV experience, given limited federal funding.
Representative Quote(s): **Corr. ID:** 503 **Organization:** Kanab City Council
Comment ID: 176152 **Organization Type:** Town or City Government
Representative Quote: In summary, Kanab City encourages Glen Canyon National Recreation Area to work toward assuring ORV users with a world class experience. We recognize federal budget limitations, but feel this can be accomplished in collaboration with local counties, communities, ORV clubs and individuals. This is not to suggest that we do not feel there is a need to protect critical resources.
Rather, we believe GCNRA can protect these resources AND provide a world class ORV experience. In doing so, you will meet your mandate as a National Recreation Area. These recommendations were supported by a unanimous vote of the Kanab City Council on November 23, 2010.

Concern ID: 27450
CONCERN STATEMENT: Some commenters specifically suggested meeting with certain agencies or holding a cooperating agency meeting to help address several issues prior to the development of the final alternatives.
Representative Quote(s): **Corr. ID:** 517 **Organization:** Kane County Commission
Comment ID: 175509 **Organization Type:** County Government
Representative Quote: Resolution of the jurisdiction of roads within the planning area also affects the GCNRA's authority to designate roads open or closed and roads restricted or unrestricted as to type of vehicles allowed. The County requests a cooperative agency meeting to discuss these issues prior to the development of the final alternatives.
Corr. ID: 531 **Organization:** *Not Specified*
Comment ID: 175988 **Organization Type:** Unaffiliated Individual
Representative Quote: Coordinate with Kane County for proper maintenance of Hole-in-the-Rock Road. Also coordinate with BLM.
Corr. ID: 532 **Organization:** *Not Specified*
Comment ID: 175996 **Organization Type:** Unaffiliated Individual
Representative Quote: Coordinate with the BLM (Richfield District, Hanksville Field Office) for routes that adjoin NPS

ED1000 - Editorial

Concern ID: 27375
CONCERN STATEMENT: Commenters provided suggestions for the alternative maps, such as adding certain roads that are not currently on the maps.
Representative Quote(s): **Corr. ID:** 482 **Organization:** *Not Specified*
Comment ID: 175029 **Organization Type:** Unaffiliated Individual
Representative Quote: Re the map you supplied. Be very careful about how you do designate what you call the Hole-in-the-Rock Road. What you should hopefully mean in your designation is the 1952 SKELLY OIL ROAD to The Rincon. Though the roads do share some common stretches to The Rincon, they are for the most part two distinct roads built more than seventy years apart.

Corr. ID: 505 **Organization:** *Not Specified*
Comment ID: 176114 **Organization Type:** Unaffiliated Individual
Representative Quote: MISSING ROAD SEGMENTS:
While I acknowledge that the ORV Plan is not a motorized travel plan, the management considerations (page 4) indicate very strongly that GCNRA intends to implement the ORV Plan in such a way that it, by default, becomes a quasi-travel plan. I say this due to the fact that included in the management considerations are actions such as designating roads, designating motor vehicle use areas, road numbering, road sign posting, etc. Therefore, it is important that GCNRA acknowledges all known roads and motorized routes much like an RMP inventory. Since the GCNRA has not properly sought public input on inventoried routes through a scoping process, it necessarily needs to include all roads and motorized routes on the final ORV Plan maps.

Corr. ID: 505 **Organization:** *Not Specified*
Comment ID: 176117 **Organization Type:** Unaffiliated Individual
Representative Quote: Please keep GCNRA a true "recreation area" where all types of recreation can be enjoyed by all ages and abilities. This means allowing motorized vehicles to travel as many routes as possible, mitigating potential abuses by education and enforcement. Knowing that the meager budgets of public land agencies are always an obstacle to implementation of any recreation based plans: we are always willing to help where needed. We (my family and I) are involved in many public land access groups including the Utah 4 Wheel Drive Association, the Utah 4x4 Club, the Utah Shared Access Alliance, Expedition Utah, and others. There is a nearly inexhaustible supply of willing labor and information outlets with these groups. We are always ready to help. If you need signs put up, routes marked, GPS tracks recorded, maps researched, kiosks constructed, information disbursed, etc, etc... please contact me and I will find a group who can do it. On any given weekend, I can probably find somebody from one of our groups that is recreating in GCNRA that may have a few hours to spare for a project. Also, if you need any more detail on any of the maps or routes I have described, please contact me. All of these routes are shown in extreme detail on many versions of topographical maps, which I am happy to provide per your request.

Corr. ID: 531 **Organization:** *Not Specified*
Comment ID: 175966 **Organization Type:** Unaffiliated Individual
Representative Quote: Consider adding road to the Rincon to alternative maps

Concern ID: 27452
CONCERN STATEMENT: Commenters suggested clarifying the use of certain terms, such as ORVs and accessible shorelines (for different vehicles).
Representative Quote(s): **Corr. ID:** 521 **Organization:** *Not Specified*
Comment ID: 175340 **Organization Type:** Unaffiliated Individual
Representative Quote: I am troubled with the term Off-Road Vehicle/ORV used throughout the GCNRA ORV Management Plan/EIS. ORV implies indiscriminate off-road, Off-trail, cross country motor vehicle travel. GCNRA should consider using the term Off-Highway Vehicle/OHV. OHV implies a high clearance 2-or 4 wheel drive vehicle used to travel off-highway on designated roads, routes & trails.

12 ORV accessible shoreline areas on Lake Powell, is an untrue and misleading statement. Motor vehicle travel is stopped far away from the

water of Lake Powell.

Corr. ID: 531

Organization: *Not Specified*

Comment ID: 175983 **Organization Type:** Unaffiliated Individual

Representative Quote: Clarify the difference of ATVs not having access to shorelines at most points (except Lone Rock). Currently the maps and keys are confusing.

GA1000 - Impact Analysis: Impact Analyses

Concern ID: 27376

CONCERN

STATEMENT:

Several commenters suggested specific impacts they felt should be analyzed, such as: impacts on water quality due to vehicles near the beach, inadequate consideration of long-term environmental impacts from ORV use, obtaining unbiased analysis, the loss of motorized recreational opportunity within the area, considering the cumulative impact of increased ORV use throughout the Colorado Plateau, citing specific areas where excessive resource damage has occurred, how the increase in ORV users will be analyzed, how the high water line will affect impacts from ORVs, completing comprehensive Class III cultural surveys for all un-surveyed routes where motor vehicle use is being considered, and completing a comprehensive climate change analysis. Commenters further suggested that the following general impact topics should be analyzed: socioeconomics, archeological resources, environmental justice, wildlife and wildlife habitat, riparian areas and shorelines, air quality, water quality, native vegetation, soils, non-native vegetation, recommended wilderness areas, and visitor experience.

Representative Quote(s):

Corr. ID: 30 **Organization:** *Not Specified*

Comment ID: 174998 **Organization Type:** Unaffiliated Individual

Representative Quote: Impact on the water quality as vehicles are on the beaches?

Corr. ID: 114 **Organization:** BlueRibbon Coalition

Comment ID: 175758 **Organization Type:** Unaffiliated Individual

Representative Quote: The cumulative loss of motorized recreational opportunity is a significant issue that should be incorporated into the analysis and into the decision making process. NEPA requires federal agencies to properly analyze the direct, indirect, and cumulative effects of the Proposed Action. 40 C.F.R. § 1508.8. Cumulative effects include "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably-foreseeable future actions?." 40 C.F.R. § 1508.7.

In NEPA, the term "environment" includes the "human environment" which "shall be interpreted comprehensively to include the natural and physical environment and the relationship of people with that environment." 40 C.F.R. § 1508.14. Thus, the agency's duty to analyze impacts does not end with impacts to the physical environment, but includes all of the effects on the human environment including the effects by vehicle-assisted visitors.

The cumulative loss of motorized recreational opportunity over the last several decades is huge. Thousands and thousands of miles of routes have been closed. These closures have and are having, a significant effect on those who are directly affected by this planning process.

The analysis should include a brief but accurate description of the current travel management rules on adjacent BLM managed lands and National Monuments, and data on the number of miles of routes closed via previous planning efforts. Significance criteria in the environmental analysis could include number of miles closed, number of acres closed or other similar quantifier. The analysis should also include a brief but accurate discussion of the ongoing travel management planning projects on adjacent lands as well as other public lands in the region. For example, the potential loss of access from the St. George Field Office Travel Management planning process should be discussed.

Corr. ID: 114

Organization: BlueRibbon Coalition

Comment ID: 175757 **Organization Type:** Unaffiliated Individual

Representative Quote: BRC requests that "cumulative loss of motorized recreation opportunities" be brought forward as a significant Planning Issue. Motorized recreational opportunity has, and continues to be, reduced throughout the region. Through the implementation of Forest Service and Bureau of Land Management and National Monument Resource Management Plans and Travel Plans, there have been literally thousands of miles of unpaved roads that have been closed to motorized use in southern Utah and northern Arizona .

Indeed, the loss of vehicle access to scenic overlooks and remote public lands in this region is so great that it was a key reason the State of Utah amended its vehicle regulations to allow for the "street licensing" of ATVs. Utah's vehicle regulations are often considered a "last resort" for many citizens who use and enjoy ORVs for recreation and access to vast areas of the Beehive State.

A critical mass has been reached. Because of the previous closures implemented by the BLM and other federal land management agencies, the remaining rugged unpaved roads accessing scenic overlooks in GCNRA have become extremely valuable. The remaining motorized trails on the GCNRA now have a much higher importance to the American public. The Warm Creek roads from Big Water to Grand Bench, including Alstrom Point, Hole-in-the-Rock in both Kane and San Juan Counties, the Seismograph, Blue Water Canyon, and Blue Pool Canyon roads leading to the Vermilion Cliffs and other unpaved roads within the recreation area now provide the last few remaining scenic roads left open for Americans who choose to enjoy OHV/ORV recreation.

Therefore, we formally request that "cumulative loss of motorized recreation opportunities" be brought forward as a significant Planning Issue.

Corr. ID: 271

Organization: *Not Specified*

Comment ID: 174687 **Organization Type:** Unaffiliated Individual

Representative Quote: Inadequate consideration of long-term environmental impacts from ORV use

Corr. ID: 304

Organization: *Not Specified*

Comment ID: 174672 **Organization Type:** Unaffiliated Individual

Representative Quote: Environmental impact studies MUST be done by scientists without personal interests in the outcome, or fear for their job. And results must be considered and duly weighted in making final decisions.

Corr. ID: 327

Organization: SUWA

Comment ID: 174768 **Organization Type:** Unaffiliated Individual

Representative Quote: I encourage you to consider the cumulative impact of increased ORV use throughout the Colorado Plateau. The primary

management objective of the NPS ORV plan for the GCNRA should be to protect natural resources, especially those found in areas recommended for wilderness designation.

Corr. ID: 329 **Organization:** *Not Specified*

Comment ID: 174778 **Organization Type:** Unaffiliated Individual

Representative Quote: The impacts from ORVs have not adequately been addressed. Without addressing the concerns from ORV use, the agency's action would be arbitrary and capricious. See State Farm. Areas that could obtain wilderness designation must be protected from wanton destruction by ORVs, thereby removing the very quality which has enabled them to be proposed. The pillage by one small group should not be allowed to remove the essential character of the land for the rest of us who jointly own it.

Corr. ID: 337 **Organization:** *Not Specified*

Comment ID: 174800 **Organization Type:** Unaffiliated Individual

Representative Quote: The identified alternatives certainly run the gamut from "do nothing" to "allow nothing". As stated in the brochure, the existing plan has been in place since 1979. I think it would be appropriate for this document to cite specific areas where excessive resource damage has occurred during this time. This should be compared to other areas of the State (or other states) where detailed Management Plans are in place to determine if more or less or similar levels of damage are occurring. I would submit that, if less or similar levels of damage are occurring, the current management practices are adequate. If significantly more resource damage is being done in this area, then a more restrictive management plan may be appropriate.

Corr. ID: 424 **Organization:** *Not Specified*

Comment ID: 175745 **Organization Type:** Unaffiliated Individual

Representative Quote: Also, please consider impacts on archeological and culturally-significant sites and ruins.

Corr. ID: 426 **Organization:** Glen Canyon Institute

Comment ID: 175762 **Organization Type:** Unaffiliated Individual

Representative Quote: What impact will ORVs have on the biological diversity of the area?

Will ORVs vector in additional invasive species problems where they are used? To what extent? What will be the adverse impacts from the invasives?

What will be the adverse impacts to quiet enjoyment of the area?

What are the sustainability/climate/greenhouse gasses impacts?

Corr. ID: 448 **Organization:** *Not Specified*

Comment ID: 175818 **Organization Type:** Unaffiliated Individual

Representative Quote: ORVs are play toys that are advertised and sold because of their ability to "go anywhere" and too many drivers are taking this to mean "off the designated trail".

By allowing ORVs the sheer increase in numbers of vehicles must be taken into consideration, as well as the types of vehicles expected and the damage that the vehicle will make as well as the costs of maintaining the routes that are open to ORVs.

Corr. ID: 503 **Organization:** Kanab City Council

Comment ID: 176148 **Organization Type:** Town or City Government

Representative Quote: We also believe there is an issue of environmental justice that needs to be addressed in the proposed alternatives. The U.S. Environmental Protection Agency defined environmental justice as "the fair

treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. It will be achieved when everyone enjoys the same degree of protection from environmental and health hazards and equal access to the decision-making process to have a healthy environment in which to live, learn, and work." Typically, environmental justice relates to a situation in our nation where hazardous waste dumps, nuclear power plants and other potentially unhealthy facilities are developed near poor and minority communities as has occurred at Page. However, the issue also applies on the Lone Rock beaches. Most of Lake Powell requires access via a houseboat or motorboat, both of which are beyond the means of many minority and low income families. As a result, the Lone Rock beaches are among the few alternatives for such families, especially the area's Native American and Hispanic population. ORVs are one option to provide these people with access and there is no indication in the proposed management plan that this issue has been taken into consideration.

Corr. ID: 503 **Organization:** Kanab City Council

Comment ID: 176140 **Organization Type:** Town or City Government

Representative Quote:) Economic benefit to our community should be adopted as a significant planning issue and considered in the final planning decision.

Corr. ID: 517 **Organization:** Kane County Commission

Comment ID: 175457 **Organization Type:** County Government

Representative Quote: The County asks that before any major closure of roads within the GCNRA that documentation of any degradation of the environment, and mitigation measures to minimize or eliminate any identified degradation be provided in the draft Plan/EIS. This planning effort should not implement the closure of some of the last remaining back country roads in southern Utah without proper justification based on impairment and degradation standards.

Corr. ID: 517 **Organization:** Kane County Commission

Comment ID: 175516 **Organization Type:** County Government

Representative Quote: Kane County requests that cumulative loss of motorized recreation opportunities be brought forward as a Planning Issue

Motorized recreational opportunity has and continues to be reduced throughout the region.

Through the implementation of Forest Service and Bureau of Land Management (including the Grand Staircase-Escalante National Monument) Resource Management Plans and Travel Plans, there have been literally thousands of miles of unpaved roads that have been closed to motorized use in Utah and Arizona.

Indeed, the loss of vehicle access to scenic overlooks in this region is so great that it was a primary reason the State of Utah amended its vehicle regulations to allow for the "street licensing" of ATVs.

Because of these closures, the remaining rugged unpaved backcountry roads accessing scenic overlooks in GCNRA have become extremely valuable. A critical mass has been reached. The remaining motorized trails on the GCNRA now have a much higher importance to the American public. The Warm Creek roads from Big Water to Grand Bench, including Alstrom Point, Hole-in-the-Rock in both Kane and San Juan Counties, the Seismograph, Blue Water Canyon, and Blue Pool Canyon roads leading to the Vermilion Cliffs and other unpaved roads within the recreation area now provide the last few

remaining scenic roads left open for American's who choose to enjoy OHV recreation. The cumulative loss of motorized recreational opportunity should be brought into the analysis and incorporated into the decision making process. Significance criteria could include number of miles closed, number of acres closed or other similar quantifier.

The analysis should include a brief but accurate description of the current travel management rules on adjacent BLM managed lands and National Monuments. The analysis should also include a brief but accurate description of the ongoing travel management planning projects on adjacent lands as well as other public lands in the region.

Corr. ID: 520 **Organization:** *Not Specified*

Comment ID: 176090 **Organization Type:** Unaffiliated Individual

Representative Quote: Any roads, and shoreline access, falling below the high water line of 3700" elevation should be considered temporary & ephemeral and not of significant environmental impact due to the fact that high water will remove any lasting impacts both visual or physical. To exclude visitor access based on "environmental impacts "below the high water line is not honest in a number of respects and turns "harmless acts of exploration" into criminal acts ... again this is not the intention of the original enabling legislation and certainly not the original intention for establishing the area for the benefit of the people of America.

Corr. ID: 542 **Organization:** Southern Utah Wilderness Alliance

Comment ID: 176132 **Organization Type:** Conservation/Preservation

Representative Quote: To comply with the Secretarial Order on climate change, the ORV Management Plan EIS must include more than a superficial, cursory discussion of climate change, and must explain the most current science and discuss how climate change will impact the resources in the NRA including threatened and sensitive species and their habitat, water resources, soils and vegetation, and how the ORV management alternatives could contribute to climate change effects.

The predicted effects of climate change are dire. [Footnote: Information on climate trends is available from a variety of common sources of weather data. See e.g., http://www.met.utah.edu/news/global_warming_2007 (hereinafter "Utah Climate Change Report")(report by University of Utah meteorologists and others showing climate warming in Utah, with more drought conditions expected).] The U.S. Climate Change Science Program working group published a report in 2007 which predicts and elaborates on the widespread impact of climate change on public lands in areas like the Mojave Desert, Great Basin, and Colorado Plateau. See U.S. Department of Agriculture, The effects of climate change on agriculture. land resources, water resources and biodiversity, available at <http://www.climate-science.gov/Library/sap/sap4-3/default.php>. That report notes that "the climate changes that we can expect are very likely to continue to have significant effects on the ecosystems of the United States." [d. at 3 (emphasis added).

Corr. ID: 542 **Organization:** Southern Utah Wilderness Alliance

Comment ID: 176120 **Organization Type:** Conservation/Preservation

Representative Quote: Comment: NPS must take a hard look at the potential indirect and cumulative impacts of the various alternatives, including potential indirect and cumulative impacts to wildlife and wildlife habitat from increased noise and disturbances; potential indirect and cumulative impacts to riparian areas and shorelines, air quality and water quality, native vegetation from fugitive dust, soil erosion and the introduction of non-native vegetation arising from ORV use in open areas and on dirt trails; and the potential

indirect and cumulative impacts to remote backcountry and recommended wilderness areas and visitor experiences in these areas if ATVs are allowed on all unpaved roads in the NRA.

Corr. ID: 542 **Organization:** Southern Utah Wilderness Alliance

Comment ID: 176134 **Organization Type:** Conservation/Preservation

Representative Quote: Comment: Given the arid, sensitive desert environment of the Glen Canyon NRA, and pursuant to the Secretary's Order, the ORV Management Plan EIS must analyze how ORV use and route designations of the various alternatives could contribute to climate change effects.

Corr. ID: 542 **Organization:** Southern Utah Wilderness Alliance

Comment ID: 176108 **Organization Type:** Conservation/Preservation

Representative Quote: Comment: In order to minimize impacts to the irreplaceable cultural resources in the NRA and to comply with the NHPA, NPS must complete comprehensive Class III cultural surveys for all unsurveyed routes that motor vehicle use is being considered, as well as for all "open" play areas being considered, provide that information to tribal entities and the SHPO, and use the survey data and information in making its ORV management decisions.

Corr. ID: 543 **Organization:** *Not Specified*

Comment ID: 175994 **Organization Type:** Unaffiliated Individual

Representative Quote: The questions asked were; Do you have documentation of "significant damage" caused by improper ATV use off of the main roads?"

The answer was; "No we don't. This EA is in response to a lawsuit that we didn't follow up properly on a prior EA." He also agreed with my observations from traveling a few of the roads the day before this meeting that there is little on- the -ground tracks off these roads and no observation of "significant" damage.

GA3000 - Impact Analysis: General Methodology For Establishing Impacts/Effects

Concern ID: 27494

CONCERN STATEMENT: [One commenter questioned what implications this ORV Management Plan has on the forthcoming General Management Plan.](#)

Representative Quote(s): **Corr. ID:** 520 **Organization:** *Not Specified*

Comment ID: 176091 **Organization Type:** Unaffiliated Individual

Representative Quote: The NRA is planning a GMP review and revision in the near future. By advancing this "plan" now it would appear that any future GMP planning effort will exclude issues related to roads, road access, and shoreline access. This may be the NPS strategy for reducing the future scope of the GMP revision, however, it appears to be less than candid, and illustrates a rather fragmented and "patch work". type of approach to the management of the NRA.

Concern ID: 27495

CONCERN STATEMENT: [One commenter suggested that baseline inventories and impact analyses on natural and cultural resources be conducted for areas when ORVs/ATVs are prohibited, and when ORVs/ATVs are allowed, in order to determine if prohibiting ORV/ATV use would minimize the impacts to resources and conflicts with other users.](#)

Representative Quote(s): **Corr. ID:** 542 **Organization:** Southern Utah Wilderness Alliance

Comment ID: 176101 **Organization Type:** Conservation/Preservation

Representative Quote: Comment: NPS can allow ORV use (including ATVs) on unpaved roads, the ORV accessible areas along the shorelines, in the Ferry Swale, Lone Rock Beach and Lone Rock Beach "play area" only if such use would minimize the impacts to natural and cultural resources and minimize conflicts with other users on each of these unpaved roads, shoreline and beach areas. Thus, NPS must assess the impacts to natural and cultural resources and other users when ORVs/ATVs are prohibited, as well as when ORV s are allowed in order to determine if allowing ORV/ATV use would, indeed, minimize the impacts to resources and conflicts with other users. NPS must disclose its analysis and findings with the public.

Concern ID: 27496

**CONCERN
STATEMENT:**

One commenter suggested that air quality analyses be conducted to address the fugitive dust generation rate of ORV areas.

Representative Quote(s): **Corr. ID:** 542 **Organization:** Southern Utah Wilderness Alliance

Comment ID: 176119 **Organization Type:** Conservation/Preservation

Representative Quote: Comment: NPS cannot evaluate consequences to the environment without adequate data and analysis. In assessing the potential impacts of the alternatives, NPS must use data and methods of high quality and establish a baseline of existing conditions against which potential impacts can be assessed. An accurate description of the baseline conditions of the NRA is crucial to NPS's analysis and description of the environmental impacts from the various alternatives, since all management decisions and strategies flow from the description of the current conditions. Unless NPS has an accurate, well-informed understanding of the current conditions, it cannot possibly begin to plan for future resource demands and needs. In particular, NPS cannot objectively decide how much ORV use to allow in the future, and which areas and routes to designate, if NPS does not know how much and what kind of damage such use has caused in the past, and is causing right now. Thus, NPS must assess the ongoing impacts of current ORV use in the NRA, and not treat the existing ORV use as the status quo it does not need to analyze and assess. In addition, NPS must not presume that ORV use will continue, or continue at the present level, and that such use will cause no damage over and above that which occurs now, or that the existing damage does not need to be studied.

Corr. ID: 542 **Organization:** Southern Utah Wilderness Alliance

Comment ID: 176131 **Organization Type:** Conservation/Preservation

Representative Quote: Dust and emissions studies have been conducted on public lands in the Mojave Desert and elsewhere, and NPS should avail itself of these studies to assist in its analyses. In addition, NPS must quantitatively assess and/or model the tailpipe emissions from motor vehicle use on unpaved routes and "open" play areas in the NRA.

Comment: ORV use can affect water quality in the NRA's waterways. NPS must assess and/or model the sedimentation and various pollutants identified in the Clean Water Act that could result from the various ORV management alternatives and disclose the potential indirect and cumulative impacts that motor vehicle use will have on water quality in the waters of the NRA.

Corr. ID: 542 **Organization:** Southern Utah Wilderness Alliance

Comment ID: 176130 **Organization Type:** Conservation/Preservation

Representative Quote: Comment: NPS must conduct a full-scale quantitative analysis of the air quality and water quality impacts of route

designation and proposed ATV and other motor vehicle use, in the NRA and, if necessary, model these impacts and ensure that national and state standards will not be exceeded.

Comment: The existence of 300 miles of designated unpaved motor vehicle route will generate fugitive dust even when not being traveled by vehicles (e.g., by wind blown dust). NPS must estimate the rate at which the 300 miles of unpaved route will generate fugitive dust when not being traveled by vehicles (including wind movement data from the local region and dust production data gathered at incremental distances from the routes), estimate the number of vehicles that will use each route, and the likely fugitive dust generation rate, and generate a model to include those variables in order to understand the true impacts of fugitive dust emissions - from both the designation of "open" play areas and motor vehicle routes, and the associated use of those play areas and routes. NPS must inventory likely fugitive dust emissions differentiated for PM10 and PM2.5 in order to begin to understand the true impacts of the route and play area designations and ORV activities included in the various alternatives.

Concern ID: 27497

CONCERN STATEMENT: One commenter stated concerns about a bias against unlicensed ORVs and non-street legal ATVs.

Representative Quote(s): **Corr. ID:** 543 **Organization:** *Not Specified*

Comment ID: 175995 **Organization Type:** Unaffiliated Individual

Representative Quote: The other question was; What is the justification to prohibit street legal ATVs on roads open to, and used by "conventional vehicles?"

The answer was; "Street legal ATVs have the potential to go off the road easier and farther than conventional vehicles."

These types of answers foster very valid concerns for the ordinary responsible citizen that the management decisions capable of denying them congressional and birth rights must and are to be made on rock solid justifiable facts. Not non-existing information or unsupportable conjecture.

The answers also seem to demonstrate a potential lack of an unbiased evaluation of the aspects of state licensed recreational vehicles; street legal ATVs.

ON1000 - Other NEPA Issues: General Comments

Concern ID: 27378

CONCERN STATEMENT: Commenters had complaints about the public scoping process, suggesting that public meetings should be held in larger cities (such as Phoenix, Denver, and Las Vegas), and that the NPS "re-scope" the process, with would give the public additional opportunity to evaluate issues, management objectives, management common to all alternatives, and suggest alternatives that have not been formulated by NPS staff.

Representative Quote(s): **Corr. ID:** 80 **Organization:** *Not Specified*

Comment ID: 171879 **Organization Type:** Unaffiliated Individual

Representative Quote: Glen Canyon Recreation area's visitors are from a much larger geographic area than is included in your public comment sites. I

cannot attend because of the distances involved. We need to slow this process down and include open house meetings in areas from your concessionaire's customer list. Most all slip and buoy customers and boat rental customers travel much farther to enjoy this recreation area. It is unfair not to give the majority of recreation area users an opportunity to voice their concerns in person, with closures on many areas on the table. Let's think about public open houses in Salt Lake City, Phoenix, Denver and Las Vegas.

Corr. ID: 114 **Organization:** BlueRibbon Coalition

Comment ID: 175744 **Organization Type:** Unaffiliated Individual

Representative Quote: It is unwise to develop preliminary alternatives prior to providing the public an opportunity to view and comment on the preliminary planning issues. Developing a set of detailed alternatives, as the NPS has done here, without disclosing the agency's preliminary planning issues, is a violation of the spirit, if not the letter of NEPA - as well as the agency's own planning regulations.

Fortunately, this issue is relatively easy to remedy at this early stage in the planning process. We recommend the agency "re-scope" the process, giving the public additional opportunity to evaluate issues, management objectives, management common to all alternatives, and suggest Alternatives that have not been formulated by the staff. Conversely, if the agency chooses to ignore our concern regarding this process violation, it would open the final decision to a great deal of controversy, let alone appeal, protest and potential litigation.

Corr. ID: 114 **Organization:** BlueRibbon Coalition

Comment ID: 175280 **Organization Type:** Unaffiliated Individual

Representative Quote: We note that there is nothing in the GCNRA enabling legislation, agency regulations, Superintendents Compendium or other planning guidance that indicates the agency can "skip" this important step in the National Environmental Policy Act (NEPA) process. Failure to disclose and seek public input on preliminary planning issues brought forward by the agency's interdisciplinary team and informing the general public of the opportunity to bring forward planning issues of their own, improperly narrows the range of alternatives and the "decision space."

Fortunately, this issue is relatively easy to remedy at this early stage in the planning process. We recommend the agency "re-scope" the process, giving the public additional opportunity to evaluate issues, management objectives, management common to all alternatives, and suggest Alternatives that have not been formulated by the staff. Conversely, if the agency chooses to ignore our concern regarding this process violation, it would open the final decision to a great deal of controversy, let alone appeal, protest and potential litigation.

Corr. ID: 359 **Organization:** *Not Specified*

Comment ID: 175136 **Organization Type:** Unaffiliated Individual

Representative Quote: I am only concerned that more people that are impacted by the reach of these implications may not know about the input that they need to provide.

Corr. ID: 517 **Organization:** Kane County Commission

Comment ID: 175469 **Organization Type:** County Government

Representative Quote: The GCNRA enabling legislation, agency regulations, or planning guidance may not allow the planning team to "skip" this important step in the NEPA process. Failure to disclose and seek public input on preliminary planning issues brought forward by the agency's

interdisciplinary team and informing the general public of the opportunity to bring forward planning issues of their own improperly narrows the range of alternatives and the "decision space."

It is unwise to develop preliminary alternatives prior to providing the public an opportunity to view and comment on the preliminary planning issues. Developing a set of detailed alternatives, as the NPS has done here, without disclosing the agency's preliminary planning issues, is a violation of the spirit, if not the letter of NEPA as well as the agency's own planning regulations. This issue is relatively easy to remedy at this early stage in the planning process. We recommend the agency "re-scope" the process, giving the public additional opportunity to evaluate issues, management objectives, and management common across all alternatives, and suggest Alternatives that have not been formulated by the staff.

Concern ID:

27499

**CONCERN
STATEMENT:**

One commenter suggested that the plan is not objective in scope and analysis, that a full range of alternatives has not been examined, and that the public has not been adequately informed of key decision criteria.

Representative Quote(s): **Corr. ID:** 114

Organization: BlueRibbon Coalition

Comment ID: 175278 **Organization Type:** Unaffiliated Individual

Representative Quote: Important issue regarding the planning process that must be addressed prior to the formulation of Draft Alternatives and release of the Draft Environmental Impact Statement (DEIS). One glaring omission from the Notice of Intent and the GCNRA Scoping Brochure is a legally adequate discussion of Planning Issues and Decision Criteria. Although the NOI states that public meetings will be held to "determine significant issues related to ORV management" and "[a] scoping brochure has been prepared that discusses the purpose and need for action and details the issues identified to date," none of the information presented in the NOI or the brochure adequately discuss preliminary planning issues and decision criteria that have already been developed by the agency, let alone disclose the opportunity for the public to bring forward issues. Without disclosure of the preliminary issues used to formulate the preliminary alternatives presented in the Scoping Brochure, the public cannot meaningfully participate in the development of alternatives.

Corr. ID: 114

Organization: BlueRibbon Coalition

Comment ID: 175750 **Organization Type:** Unaffiliated Individual

Representative Quote: There is no provision that bans unlicensed vehicles in the GCNRA's enabling legislation. Also, the settlement of the 2005 lawsuit referenced on page 3 of the Scoping Brochure is a door that swings both ways. It does not mandate the elimination of unlicensed ORVs. Where appropriate, and with public involvement and environmental analysis, the settlement, as well as NPS regulations, allow the agency to designate routes and areas for unlicensed ORV use. Excluding such an option improperly narrows the "decision space" and the range of the Alternatives.

Corr. ID: 114

Organization: BlueRibbon Coalition

Comment ID: 175756 **Organization Type:** Unaffiliated Individual

Representative Quote: Also, important decision criteria that have apparently been discussed behind closed doors in the agency are not disclosed to the public. The agency is discussing and developing criteria to evaluate licensed ORV use on unpaved roads. Yet this important decision criterion is not even mentioned in the NOI, and is given only a passing reference in the Scoping Brochure. Such non-disclosure of key decision

criteria is not only a violation of the spirit of NEPA, but also serves to poison the public who often are of the opinion that the "decision has already been made" and their input doesn't matter. Please consider improving the information made available to the public as you proceed.

Concern ID: 27500

CONCERN

STATEMENT:

Representative Quote(s): **Corr. ID:** 330 **Organization:** *Not Specified*

Comment ID: 174782 **Organization Type:** Unaffiliated Individual

Representative Quote: I would have liked to be at one of the open houses to address this, will there be more?

PN1000 - Purpose And Need: Planning Process And Policy

Concern ID: 27379

CONCERN

STATEMENT:

Commenters had concerns regarding the planning process, specifically confusion related to the "management considerations," the characteristics of the planning issues, the lack of information on monitoring and how benchmarks would be established, the brief comment period, the incomplete road inventory as listed in the 1979 GMP, the lack of a comprehensive plan for the entire NRA.

Representative Quote(s): **Corr. ID:** 114 **Organization:** BlueRibbon Coalition

Comment ID: 175754 **Organization Type:** Unaffiliated Individual

Representative Quote: The quality of the information made available to the public could be improved

While we address this issue via specific requests that the DEIS include clear definition of key terms that are used in the NOI and the Scoping Brochure in other sections of these comments, we wanted to amplify our concern over the generally poor quality of the information provided to the public thus far.

The NOI and other information provided to the public thus far is rife with undefined terms and inadequate discussion regarding key land use planning concepts, such as planning issues, planning criteria, management common to all alternatives, etc. Information provided to the public needs to be improved in order to formulate a defensible ORV management plan.

More specifically, we are concerned that the general public will not understand the distinction between the ORV Management Plan and related EIS and a special regulation (pursuant to 36 CFR 4.10). The public does not understand why a special regulation is necessary or what management options are available via such special regulation.

Corr. ID: 114 **Organization:** BlueRibbon Coalition

Comment ID: 175772 **Organization Type:** Unaffiliated Individual

Representative Quote: The term "management considerations" and the items listed under this section on page 4 of the Scoping Brochure must be clarified prior to the development of Draft Alternatives or the release of the DEIS.

The "Management Considerations" on page 4 of the Scoping Brochure are very confusing. Many of the items listed there seem like planning criteria, decision criteria, or sideboards. Some items read like "management common to all alternatives." One statement seems more appropriate as a purpose and

need statement:

A significant problem identified by the project's interdisciplinary team (IDT) and the public was the lack of clear guidance regarding the regulations governing ORV use in the recreation area.

(Scoping Brochure, page 4, under "Management Considerations") This seems more appropriate as a purpose and need statement, not a "management consideration" or a "planning issue," and certainly cannot reasonably be described as a "management consideration."

Corr. ID: 114 **Organization:** BlueRibbon Coalition

Comment ID: 175771 **Organization Type:** Unaffiliated Individual

Representative Quote: The NOI and Scoping Brochure contains numerous undefined terms making it difficult for the general public to understand the scope of the decision. The DEIS must include definitions to all terms used in the document, including all terrain vehicle ("ATV"), off-road vehicle ("ORV") and "conventional motor vehicles."

Corr. ID: 114 **Organization:** BlueRibbon Coalition

Comment ID: 175774 **Organization Type:** Unaffiliated Individual

Representative Quote: The public must be given the opportunity to comment on the development key decision criteria.

The NOI and Scoping Brochure fails to disclose preliminary planning issues developed by the agency's planning team. In addition, the elusive "criteria developed to evaluate ATV use on unpaved roads" on page 9 of the Scoping Brochure makes it extremely difficult, if not impossible, for the recreating public to determine the potential impacts of each alternative, let alone offer meaningful public input.

BRC and its members strongly object to the development of key decision criteria without the opportunity to comment prior to the development of Draft Alternatives and release of the DEIS. This violates the spirit, if not the letter of NEPA. Providing the public opportunity to comment on issues, management objectives, and decision criteria is the purpose of the Scoping process.

Again, this critical process flaw is relatively easy to remedy in this early stage of the planning process. Please "re-scope" the ORV management plan, disclose the preliminary planning issues, decision criteria, management common to all alternatives, etc., and allow for the public to review and comment on the issues and criteria used in the development of preliminary alternatives. Doing so will allow the public to provide meaningful involvement as mandated by law. Conversely, proceeding along this course will result in unnecessary controversy, conflict and potential challenge of the Final Plan.

Corr. ID: 296 **Organization:** *Not Specified*

Comment ID: 174927 **Organization Type:** Unaffiliated Individual

Representative Quote: I think the alternatives are comprehensive based on the Purpose and Need. I do think a bit more information on the monitoring and how benchmarks would be established would have been helpful in the brochure.

Again, just how measurable objectives for monitoring would be established. Based on that, it would be easier to determine if the NPS would be able to adequately monitor ORV use. Unknown benchmarks leave me wondering if it is too vague or too expensive to adequately monitor.

Corr. ID: 326 **Organization:** *Not Specified*

Comment ID: 174765 **Organization Type:** Unaffiliated Individual
Representative Quote: Keep asking for feedback, get the word out to more of the population for input. A month is not enough time.

Corr. ID: 520 **Organization:** *Not Specified*

Comment ID: 176085 **Organization Type:** Unaffiliated Individual

Representative Quote: None of the Draft Alternatives address the incomplete GCNRA road inventory as listed in the 1979 GMP. The 1979 GMP was a flawed document as pertains to the lack of recognition of roads existing and in use at the time of its adoption. Many of these roads are in general use within the NRA today. If the Draft Alternatives do not specifically recognize the existence of these roads, or specifically identify that they are to be eliminated, or that general public travel is to be restricted on routes currently in general use, the EIS is not complete and does not fulfill its statutory purpose. By not specifically addressing the existence of these roads and their current recreational uses, GCNRA is not being completely candid about the impact of the proposed Plan. The GMP needs to be amended to reflect the existence and common public usage of these roads which existed prior to 1979 or developed subsequently with the knowledge of the NPS.

(Examples of roads not in the GMP but in general use include: (Lees Ferry Corral Road, The Rincon Road, The Sitdown Bench Road, The Dead Dog Road, The Lees Ferry Repeater Road, etc.)

Corr. ID: 520 **Organization:** *Not Specified*

Comment ID: 176089 **Organization Type:** Unaffiliated Individual

Representative Quote: The Draft Plan does not articulate what, if anything, will be done

with roads commonly in use but not identified as roads in the GMP. The assumption is that they will be "closed". There needs to be a "plan" on how this will be accomplished and how the closure of these roads will be maintained. The NRA has a terrible record of maintaining any program beyond the "NRA life" of the managers responsible for the programs implementation. Also the NRA has a very poor record of enforcing any decision away from the highly developed & convenient locations due to lack of personnel, lack of commitment, and lack of management oversight.

Corr. ID: 531 **Organization:** *Not Specified*

Comment ID: 175987 **Organization Type:** Unaffiliated Individual

Representative Quote: Piece-mealing management of roads is missing the boat on the overall problems of road opening and closing. Needs to be addressed comprehensively for the whole recreation area

Corr. ID: 533 **Organization:** *Not Specified*

Comment ID: 176017 **Organization Type:** Unaffiliated Individual

Representative Quote: Define "conventional vehicle".

Corr. ID: 542 **Organization:** Southern Utah Wilderness Alliance

Comment ID: 176118 **Organization Type:** Conservation/Preservation

Representative Quote: Comment: NPS must provide the public with an explanation of both the data used in analyzing the potential effects of the ORV management alternatives and the methods used to conduct the analysis, as well as an opportunity to provide comments and propose corrections or improvements.

Concern ID:

CONCERN

27503

One commenter suggested bringing an oversized map to the public meetings

STATEMENT: that can be drawn on as the planning process progresses.

Representative Quote(s): **Corr. ID:** 533 **Organization:** *Not Specified*

Comment ID: 176033 **Organization Type:** Unaffiliated Individual

Representative Quote: Bring a big map we can write on as we progress in the planning process and/or photos of specific areas to help visualize.

PN2000 - Purpose And Need: Park Purpose And Significance

Concern ID: 27380

CONCERN STATEMENT: Several commenters noted that Glen Canyon is a Recreation Area and not a National Park, and as such, it should be managed with recreation as the top priority, not preservation of natural resources.

Representative Quote(s): **Corr. ID:** 100 **Organization:** U4WDA

Comment ID: 172129 **Organization Type:** Unaffiliated Individual

Representative Quote: I am a tax payer, a recreationalist that uses four wheel drive to get to areas that my legs will no longer get me to. I am a very conscientious and conservative minded four wheeler, as the majority of us are, yet the few want to close trails and roads. It is a National Recreation area, let it be that and not a controlled environment for a few select.

Corr. ID: 114 **Organization:** BlueRibbon Coalition

Comment ID: 175269 **Organization Type:** Unaffiliated Individual

Representative Quote: While the GCNRA is managed by the National Park Service, it is important for the planning team and the decision maker to consider that it is a National Recreation Area. The enabling legislation mandates the agency to provide for public outdoor recreation use and enjoyment of Lake Powell and lands adjacent thereto, and to preserve scenic, scientific, and historic features contributing to public enjoyment of the area.

Corr. ID: 114 **Organization:** BlueRibbon Coalition

Comment ID: 175752 **Organization Type:** Unaffiliated Individual

Representative Quote: There are many compelling reasons for considering at least one alternative that allows unlicensed ORVs on some or all unpaved roads in the NRA. First and most importantly, the GCNRA is not a National Park and unlicensed ORVs should be considered a suitable use of the NRA. Unlicensed ORVs are allowed on lands adjacent to the GCNRA, including on roads within the Grand Staircase Escalante National Monument. Unlicensed ORVs are allowed on unpaved roads in Kane and San Juan Counties in Utah. Allowing unlicensed ORVs on certain roads is consistent with San Juan and Kane County ordinances. Not allowing unlicensed ORVs is inconsistent with the management plans of adjacent jurisdictions.

Allowing unlicensed ORVs provides several benefits. First, doing so will enhance recreational use of the NRA consistent with the enabling legislation. Allowing unlicensed ORVs will also improve the agency's opportunity to leverage funds for management, monitoring and law enforcement that are available via Utah State Parks and Recreation's OHV program. Both Utah counties, as well as user groups, are eager to cooperate with any federal agency that provides for this popular recreational use.

We formally request the agency include an alternative that amends the GCNRA plan allowing for unlicensed ORVs on some or all of the unpaved roads in the NRA.

Corr. ID: 463 **Organization:** Utah 4 Wheel Drive Association
Comment ID: 175856 **Organization Type:** Unaffiliated Individual
Representative Quote: Alternatives B, C and E are not consistent with the enabling legislation

Congress established the GCNRA "(a) In order to provide for public outdoor recreation use and enjoyment of Lake Powell and lands adjacent thereto in the States of Arizona and Utah and to preserve scenic, scientific, and historic features contributing to public enjoyment of the area..."

Alternatives B, C and E all eliminate a highly valued recreation experience (licensed ORVs on unpaved roads). This is in directly conflict with intent of Congress.

Again, we wish to empathize that the GCNRA is a National Recreation Area and not a National Park.

Corr. ID: 503 **Organization:** Kanab City Council
Comment ID: 176142 **Organization Type:** Town or City Government
Representative Quote: We suggest that the proposed alternatives are in conflict with the intent for which National Recreation Areas were established and that environmental issues, while important, are being given more consideration than recreation use. The Federal Executive Branch Policy Governing the Selection, Establishment and Administration of National Recreation Areas by the Recreation Advisory Council- Circular No. 1, March 26, 1963 states that "Within National Recreation Areas, outdoor recreation shall be recognized as the dominant or primary resource management purpose. If additional natural resource utilization is carried on, such additional use shall be compatible with fulfilling the recreation mission, and none will be carried on that is significantly detrimental to it." Most of the proposed alternatives are not consistent with this mandate.

Corr. ID: 517 **Organization:** Kane County Commission
Comment ID: 175547 **Organization Type:** County Government
Representative Quote: 2. Alternatives B, C and E are not consistent with the enabling legislation Congress established the GCNRA "(a) In order to provide for public outdoor recreation use and enjoyment of Lake Powell and lands adjacent thereto in the States of Arizona and Utah and to preserve scenic, scientific, and historic features contributing to public enjoyment of the area ... "

Alternatives B, C and E all eliminate a highly valued recreation experience (licensed ORVs on unpaved roads). This is in directly conflict with intent of Congress.

Again, the County emphasizes that the GCNRA is a National Recreation Area, not a National Park.

Corr. ID: 527 **Organization:** *Not Specified*
Comment ID: 175932 **Organization Type:** Unaffiliated Individual
Representative Quote: I understand that ORV fans have asked you to reopen the old jeep trail from Road 450 to the Rincon. That would be an atrocity because it would bisect the Wilson Mesa roadless area, which you have recommended for wilderness status. I believe reopening this road is beyond the scope of the ORV management plan, because it would require an amendment to the General Management Plan. Please keep this roadless area intact.

PN3000 - Purpose And Need: Scope Of The Analysis

Concern ID: 27381

**CONCERN
STATEMENT:**

Commenters stated that the Lone Rock area should be removed from consideration in this planning project because the NPS has already completed a management plan and environmental analysis for the Lone Rock Off Road Vehicle Area.

Representative Quote(s): **Corr. ID:** 114 **Organization:** BlueRibbon Coalition

Comment ID: 175746 **Organization Type:** Unaffiliated Individual

Representative Quote: As noted in the Scoping Brochure and the Notice of Intent, the agency has just recently completed a management plan and environmental analysis for Lone Rock. To include this area in this planning effort is unneeded and a waste of agency budget and staff resources. In addition, ORV enthusiasts are likely to view including Lone Rock as a "second bite at the apple" designed to impose additional restrictions on motorized recreation.

The recently completed planning effort for Lone Rock complies with the agency's mandate to complete ORV designation, management and monitoring. There is no change in conditions or compelling need to revisit these decisions. The Lone Rock area should be removed from consideration in this planning project.

Important note:

If the staff or the decision-maker is making the argument that a failure to comply with a "rulemaking" component of the previous planning effort on Lone Rock mandates its inclusion in this planning effort, we advise the agency proceed very cautiously. Such specious rationale confirms any conclusion drawn by the general public that the agency simply wishes "another bite" that will further limit, or perhaps even eliminate, ORV use at Lone Rock. If it is true that the previous planning effort at Lone Rock failed to comply with any "rulemaking" provision, that failure needs to be remedied by complying with any relevant "rulemaking" requirements without change to the decision made in the previous planning effort.

Corr. ID: 463 **Organization:** Utah 4 Wheel Drive Association

Comment ID: 175851 **Organization Type:** Unaffiliated Individual

Representative Quote: The GCNRA ORV Management Plan/EIS clearly states that the Lone Rock Areas were previously analyzed. The only flaw identified is that the NPS failed to promulgate special regulations pursuant to 36 CFR 4.10(b), and for failing to monitor ORV areas pursuant to E.O. 11644. If the conditions at the Lone Rock Beach and ORV areas have not significantly changed since the preparation of the EA, U4WDA believes that the special regulations for these areas may be prepared without re-evaluating them in the EIS.

Corr. ID: 517 **Organization:** Kane County Commission

Comment ID: 175470 **Organization Type:** County Government

Representative Quote: Lone Rock Beach and ORV Areas

The GCNRA ORV Management Plan/EIS clearly states that the Lone Rock Areas were previously analyzed. The only flaw identified is that the NPS failed to promulgate special regulations pursuant to 36 CFR 4. 10(b), and for failing to monitor ORV areas pursuant to E.O. 11644. If the conditions at

the Lone Rock Beach and ORV areas have not significantly changed since the preparation of the EA, the County believes that the special regulations for these areas may be prepared without re-evaluating them in the EIS. However, the NPS should include State of Utah street-legal (licensed) ATV's/UTV's in the special regulations.

Concern ID: 27506
CONCERN STATEMENT: One commenter stated that the NPS should respect its limits on jurisdiction within the ORV Management Plan.
Representative Quote(s): **Corr. ID:** 114 **Organization:** BlueRibbon Coalition
Comment ID: 175776 **Organization Type:** Unaffiliated Individual
Representative Quote: The agency must respect limits on its jurisdiction The GCNRA Scoping Brochure, under "Management Considerations," page 4 states:
- Roads within the recreation area would be designated and posted with road numbers as part of Glen Canyon's road numbering system.
As we noted in Section D of these comments, the agency must respect the legal limits on its jurisdiction. Just as it lacks jurisdiction on Tribal and private lands, it similarly lacks jurisdiction over certain rights of ways existing in the NRA. The agency has a basic legislative mandate to acknowledge and protect valid existing rights, including rights of ways under the jurisdiction of the State and local governments. This statement should be modified to read:
- Roads within the recreation area that are under the NPS jurisdiction would be designated and posted with road numbers as part of Glen Canyon's road numbering system.

Concern ID: 27507
CONCERN STATEMENT: One commenter suggested that the NPS does not need to provide access to Lake Powell, because there is already a BLM managed road system that leads to the lake.
Representative Quote(s): **Corr. ID:** 389 **Organization:** Not Specified
Comment ID: 175101 **Organization Type:** Unaffiliated Individual
Representative Quote: There is no need for GCNRA to provide ORV access. Lake Powell reservoir is very accessible via the GCNRA road system, and is surrounded by millions of acres of lands administered by the Bureau of Land Management, most of which are open to ORV use.

Concern ID: 27508
CONCERN STATEMENT: One commenter asked for clarification as to whether the scope of the plan includes the use of conventional vehicles on GMP roads.
Representative Quote(s): **Corr. ID:** 512 **Organization:** Not Specified
Comment ID: 175367 **Organization Type:** Unaffiliated Individual
Representative Quote: My remarks pertain to the Unpaved GMP Roads component of the Alternatives.
1. The "street-legal" application you apply to off road use is very confusing. A street legal "ATV" in Utah is permitted on some two lane paved roads with speed limits of 45mph or less, but to my knowledge the law has nothing to do with back country roads. You say that "use of conventional vehicles on all GMP roads is not within the scope of this plan", yet your alternatives show various roads either open or closed to conventional vehicles. Confused again. Please clarify what

constitutes the difference between a Conventional Vehicle, OHV and an ATV.

PN4000 - Purpose And Need: Park Legislation/Authority

Concern ID: 27382

**CONCERN
STATEMENT:**

One commenter noted that because Glen Canyon is a National Recreation Area, the NPS has a legislative mandate to provide for recreation; thus the management plan should include at least one alternative that does not limit ORV use, and one alternative that enhances recreational access to the NRA.

Representative Quote(s): **Corr. ID:** 93 **Organization:** *Not Specified*

Comment ID: 171904 **Organization Type:** Unaffiliated Individual

Representative Quote: While the GCNRA is managed by the National Park Service, it is important for the decision maker to consider that it is a National Recreation Area. The enabling legislation mandates the agency to provide for public outdoor recreation use and enjoyment of Lake Powell and lands adjacent thereto, and to preserve scenic, scientific, and historic features contributing to public enjoyment of the area.

Outdoor recreation, including motorized vehicle based recreation, has grown in popularity over the last several decades. Given the legislative mandate to provide for recreation and the administration's desire to facilitate outdoor recreation, I request that the agency develop at least one Alternative that does not limit ORV use, and one Alternative that enhances recreational access to the GCNRA.

Concern ID: 27510

**CONCERN
STATEMENT:**

Commenters noted that the 1916 National Park Service Organic Act and the 1972 Glen Canyon National Recreation Area Establishment Act require the NPS to protect the NRA from the impacts of ORV use.

Representative Quote(s): **Corr. ID:** 408 **Organization:** Glen Canyon Institute

Comment ID: 175699 **Organization Type:** Unaffiliated Individual

Representative Quote: Existing use, let alone increased access to ORV's in GCNRA, is in direct conflict with the Park Service's legal mandate to protect the natural integrity of its lands as established in legislative and administrative directive.

Corr. ID: 411 **Organization:** Glen Canyon Institute

Comment ID: 175712 **Organization Type:** Unaffiliated Individual

Representative Quote: The National Park Service has a legal mandate to protect GCNRA from the impacts of ORV use. This includes the 1916 National Park Service Organic Act, the 1972 Glen Canyon National Recreation Area establishment act, and Executive Order No. 11644 of 1972.

Corr. ID: 424 **Organization:** *Not Specified*

Comment ID: 175743 **Organization Type:** Unaffiliated Individual

Representative Quote: Please comply with executive order #11644 and consider impacts to wilderness and proposed wilderness areas.

Corr. ID: 429 **Organization:** University of Illinois - Urbana-Champaign

Comment ID: 175773 **Organization Type:** Unaffiliated Individual

Representative Quote: Indirect high impact recreation such as Motorized Recreation and ATV use destroys terrain, soundscapes and creates a recreational experience in clear contradiction with the NPS' mandate.

PN6000 - Purpose And Need: Land Management Laws, Exec Orders

Concern ID: 27383

CONCERN

STATEMENT:

Commenters urged the NPS to comply with the Executive Order No. 11644 governing ORV use in Glen Canyon National Recreation Area, which requires NPS to protect the natural resources and public lands from ORV impacts, to promote public safety of all users of those lands, and to minimize impacts to natural resources.

Representative Quote(s): **Corr. ID:** 393 **Organization:** Glen Canyon Institute

Comment ID: 175496 **Organization Type:** Unaffiliated Individual

Representative Quote: In summary, the GCNRA EIS is required to fully document the significant natural, historic, and recreational resources of GCNRA, assess the potential impacts of ORV use on those resources, consider a reasonable range of management alternatives, and choose an alternative that is consistent with GCNRA's legal mandate. A GCNRA plan that continues current levels of ORV access, or increases ORV access, would not only be harmful to the integrity GCNRA, but it would also be inconsistent with the law.

Corr. ID: 473 **Organization:** SUWA

Comment ID: 175886 **Organization Type:** Unaffiliated Individual

Representative Quote: I think that the intent of the Wilderness Act in general and the direction of Executive Order 11644 in particular should dictate a conservative approach to ORV management in the GCNRA.

Corr. ID: 542 **Organization:** Southern Utah Wilderness Alliance

Comment ID: 176122 **Organization Type:** Conservation/Preservation

Representative Quote: The Executive Order puts the burden on NPS to ensure that NPS lands and resources - including natural, aesthetic and scenic values - are not harmed by ORV use. NPS must provide sufficient documentation demonstrating that it has complied with the Executive Order's "minimization criteria" for each trail ORV use is considered. Approval of ORV use without the requisite findings or analyses, violates the letter and spirit of the Executive Order.

Comment: NPS must analyze and assess the impacts of ORV use to natural and cultural resources, and other recreational users for each route and "open" area proposed for ORV use and disclose its analysis to the public so that the decision-maker and the public will have the necessary information to form an opinion as to whether ORV use on the proposed routes and areas will minimize the impacts to the natural and cultural resources, as required by the Executive Order.

PN8000 - Purpose And Need: Objectives In Taking Action

Concern ID: 27384

CONCERN

STATEMENT:

One commenter suggested that the management plan should reflect two objectives: 1) Strictly regulate ORVs, and 2) Prevent ORVs from entering the roadless back country of the NRA.

Representative Quote(s): **Corr. ID:** 351 **Organization:** Maryland Ornithological Society

Comment ID: 176050 **Organization Type:** Unaffiliated Individual

Representative Quote: MOS believes the ORV management plan should reflect these two objectives, to prevent serious damage to wildlife habitat in GCNRA:

(1) Regulate ORVs strictly so they won't get out of control, as occurred at Cape Hatteras National Seashore and Wrangell-St. Elias National Park.

They should be restricted to places where the impacts are minimal, and where park rangers can easily enforce the regulations.

(2) Prevent ORVs from entering the roadless back country of GCNRA and contiguous BLM roadless areas. This means keeping ATVs off roads that would serve as entry points for unlawful riding into the back country.

PN9000 - Purpose And Need: Issues And Impact Topics Selected For Analyses

Concern ID: 27514

CONCERN STATEMENT: One commenter stated that one omission from the Notice of Intent and the Scoping Brochure is a legally adequate discussion of Planning Issues and Decision Criteria.

Representative Quote(s): **Corr. ID:** 517 **Organization:** Kane County Commission

Comment ID: 175468 **Organization Type:** County Government

Representative Quote: One glaring omission from the Notice of Intent and the GCNRA Scoping Brochure is a legally adequate discussion of Planning Issues and Decision Criteria. Although the Notice of Intent (NOI) states that public meetings will be held to "determine significant issues related to ORV management" and "[a] scoping brochure has been prepared that discusses the purpose and need for action and details the issues identified to date," none of the information presented in the NOI, the brochure or the public meetings adequately discuss preliminary planning issues that have already developed by the agency let alone disclosed the opportunity for the public to bring forward issues. Without disclosure and comment on preliminary issues, the public cannot meaningfully participate in the development of alternatives.

Planning issues are a matter of controversy or dispute over resource management activities or land use that is well defined or topically discrete and entails alternatives among which to choose or decide. Planning issues may have two or more of the following characteristics: 1) Concern expressed by the public, state, tribe or local government, 2) Existing or potential serious degradation of public land, 3) possible significant impacts, and 4) proposed uses which may or may not be in the best public interest and which may be in substantial conflict with other uses.

PO4000 - Park Operations: Impact Of Proposal And Alternatives

Concern ID: 27386

CONCERN STATEMENT: Commenters stated that because many of the non-paved routes may be open to conventional vehicles only under all of the alternatives, the NRA will incur the burden of maintaining these routes to a level where conventional vehicles can access them. Similarly, commenters felt that the alternatives would increase operational burdens to the park, including law enforcement.

Representative Quote(s): **Corr. ID:** 113 **Organization:** Public Lands Equal Access

Alliance (PLEAA)

Comment ID: 172164 **Organization Type:** Unaffiliated Individual

Representative Quote: 2. In all the alternatives, most all non-paved routes are Open to conventional vehicles only; This will put a very heavy burden on the GCNRA to bring these routes up to a standard of quality and to maintain these routes to a level where conventional vehicles can access them and the areas of interest they allow the public to recreate in.

Corr. ID: 482 **Organization:** *Not Specified*

Comment ID: 175039 **Organization Type:** Unaffiliated Individual

Representative Quote: Some things to think about.

A. Studies have shown that, on average, 40% or more of ORV riders admit to riding illegally off road.

B. Unless your management plan includes vastly ramping up the number of law enforcement rangers, you will have more and more illegal ORV riding in Glen Canyon NRA. Though land managers usually think of ORV abuse as being something you see on the land, it also must include the impacts of other visitors who come for quiet recreation. Huge swaths of BLM land in Utah used to be multiple use. Once the ORVs came, it was no longer possible to have any more than one use: ORV riding. Everyone else gets pushed out. Seems like the NRA, to be fair to quiet recreationists, must keep ORVs out: The motorized recreationists already have a dominant position in Glen Canyon NRA (boats).

C. The BLM has tried using barriers to stop illegal ORV riding. Those barriers are commonly called "fire wood" or "targets." They don't work well. Just from a management point of view, one would think it would be a whole lot easier to limit access to conventional vehicles only. Although they can and do illegally go off-road, they are not nearly as destructive as ORVs.

Concern ID: 27516

CONCERN STATEMENT:

One commenter suggested that the inability of the NPS to adequately enforce ORV restrictions should lead to prohibiting ORV use in areas adjacent to areas where ORVs are not allowed.

Representative Quote(s): **Corr. ID:** 327 **Organization:** SUWA

Comment ID: 174770 **Organization Type:** Unaffiliated Individual

Representative Quote: The inability of the NPS to adequately enforce ORV restrictions should lead to more caution in encouraging ORV use in areas adjacent to, or that lead to, areas where ORVs are not allowed. While the majority of ORV users are respectful of regulations pertaining to where they can travel, a small minority can cause considerable impact and often irreparable damage to the resources the NPS is required to protect. Managing for increased motorized recreation would diminish the true and highest value of the NRA as the natural treasure it is.

Concern ID: 27517

CONCERN STATEMENT:

One commenter suggested that the NRA already has enough staff to help mitigate damage from unauthorized ORV use, and as a result, additional closures of areas are not necessary.

Representative Quote(s): **Corr. ID:** 533 **Organization:** *Not Specified*

Comment ID: 176030 **Organization Type:** Unaffiliated Individual

Representative Quote: Mitigating damage from off-road travel that occurs because of unauthorized use is a management function and management duty. It should not result in closure of areas. You have enough staff on the lake and some could be used to pound in stakes or wipe out roads (mitigate damage).

Concern ID: 27518
CONCERN STATEMENT: One commenter suggested that the NPS adopt a "closed unless posted open" policy in order to encourage legal ORV use and discourage the removal of route signs. Further the NPS should also develop an informational brochure and map, detailing all of the areas open to the various types of allowable uses.

Representative Quote(s): **Corr. ID:** 542 **Organization:** Southern Utah Wilderness Alliance
Comment ID: 176106 **Organization Type:** Conservation/Preservation
Representative Quote: Comment: NPS must adopt a "closed unless posted open" policy in order to encourage legal ORV use and discourage the removal of route signs. This is a logical interpretation of 36 C.F.R. 4.10(a) ("Operating a motor vehicle is prohibited except on park roads, in parking areas and on routes and areas designated for off-road vehicle use") and should be made apparent during the designation process. NPS must also develop an informational brochure with a map, explaining the NRA's ORV policy including which routes (if any) are open to ATVs, which areas (if any) are "open" play areas, which shorelines (if any) are available to ATV use; explaining the content, purpose and intent of NPS's ORV regulations, including the restrictions on ORVs and the penalties and remedies available for violation thereof; and summarizing Executive Order 11644, as amended. The brochure should also include a description of impacts to natural and cultural resources that can be caused by ORV use.

SE4000 - Socioeconomics: Impact Of Proposal And Alternatives

Concern ID: 27387
CONCERN STATEMENT: One commenter stated that hiking activities have declined due to the presence of ORV tracks that discourage visitors from hiking in places where these tracks occur, which could have negative implications on Utah's tourism industry.

Representative Quote(s): **Corr. ID:** 258 **Organization:** Defenders Of Wildlife, SUWA
Comment ID: 175214 **Organization Type:** Unaffiliated Individual
Representative Quote: Tourism in Utah should embrace the concept there is a loss of interest in hiking in places that have been tore up by ATV wheels. The whole idea of making the effort on foot is to see nature to gain a respect for the many miracles of plant & animal life.

Concern ID: 27520
CONCERN STATEMENT: Commenters noted that ORV users would suffer economically if ORV use is restricted or prohibited as a result of this plan. Similarly, they felt that local economies and NRA revenues could be hurt if ORV use is restricted or prohibited.

Representative Quote(s): **Corr. ID:** 285 **Organization:** Not Specified
Comment ID: 174745 **Organization Type:** Unaffiliated Individual
Representative Quote: All of the alternative plans only impact motorized use. It is always the motorized user that is asked and/or forced to give up something. No plans ever restrict use by hikers or equestrian users. Motorized users are the ones supporting the economy. We purchased ATV's and UTV's at considerable cost, clothing and accessories are purchased, we pay for insurance and licensing fees. We purchase vehicles and trailers to transport the equipment and pay the same fees for those. At a time when our economy is suffering it would be ill advised to implement restrictions to a

group that spends so much money on this segment of recreation and the economy.

Corr. ID: 292 **Organization:** *Not Specified*

Comment ID: 174906 **Organization Type:** Unaffiliated Individual

Representative Quote: I believe that those who have the foresight to have their ATV's and other ORV's registered legally with the state of jurisdiction are showing considerable responsible behavior and should be given wide latitude regarding their access to wilderness areas. These are the people who are contributing most to society by providing employment by purchase of vehicle and adding to the tax base by registering their vehicles. Not being allowed to enter with a vehicle and keeping the area sterile is not in the interest of the public in that, we the people are not accessing and learning about the history and geography of these areas by anything closer than second hand knowledge. This is of negligible tangible benefit to the public and gives those who cannot traverse by means other than ORV a lower level of consideration not in keeping with the 4th Amendments equal protection clause of the US Constitution.

Corr. ID: 294 **Organization:** CCOHVA

Comment ID: 174918 **Organization Type:** Unaffiliated Individual

Representative Quote: If we keep listing and doing what SUWA and other tree hugger groups want, we will soon have no places for families to go, and enjoy these great areas. Also by people using these areas of recreation they spend lots of money and boost the economy, so more jobs are created, and all is good in the world

Corr. ID: 495 **Organization:** UT/AZ ATV club Canyon
Country 4x4 Jeep

Comment ID: 175082 **Organization Type:** Recreational Groups

Representative Quote: People pay to play in this area -- what would closing Lone Rock do to park income.

Corr. ID: 503 **Organization:** Kanab City Council

Comment ID: 176139 **Organization Type:** Town or City Government

Representative Quote: Kanab, Utah and the economic impact associated with proposed alternatives limiting ORV use Kanab, Utah is the closest full-service gateway community providing support services to tourists visiting the Glen Canyon National Recreation from Utah, Nevada, California and other western states on U.S. Highway 89 from the West. Kanab is one of only thirteen towns designated by the State of Utah as a resort community and allowed to collect a resort community's tax. This-tax is authorized by Utah Code §59-12-401 and Utah Code §59-12-402 if a community's transient room capacity is at least 66 percent of its permanent population. This designation is noted to emphasize the importance of tourist traffic to Kanab, a significant portion of which is traveling to the Glen Canyon National Recreation Area. ORV-related tourism has become an increasingly important source of business income for local ATV sales, repair, rental and tour companies as ORV enthusiasts worldwide have learned about Kane County's incomparable landscape. For example, Dirt Wheels Magazine rated Kane County's ORV experience as the #1 scenic riding areas in the nation. . Associated transient room tax, sales tax and resort community tax revenues are vital to Kanab's ability to meet the demand both by residents and tourists for critical services. Consequently, we are vitally concerned with alternatives proposing the elimination of ORV access to areas with the Glen Canyon National Recreation Area.

Corr. ID: 517 **Organization:** Kane County Commission

Comment ID: 175543 **Organization Type:** County Government

Representative Quote: Economic impacts to local, regional and national areas should be brought forward as a Planning Issue.

The GCNRA has attempted to limit the scope of this EIS but all the alternatives could have significant local and national consequences in the social and economic impact areas of concern. Given the current state of the National economy and the concerns of the Administration to create jobs and funding sources we believe the social/economic aspects of an EIS procedure should be included in this EIS.

Local social/economic concerns are; but are not limited to, insuring that the need to adequately evaluate the highest recreational and economic value of the vehicle assessable shoreline and vehicle touring of the unpaved roads in the GCNRA has been brought forth in this, and all future planning alternatives.

The continued need for current and even expanded Shoreline access for that highly desirable recreation experience in a desert setting for significant numbers of Kane County residents and families is evident by their purchases, and current use with-in the GCNRA, of large and small RVs, campers and trucks to pull them , boats of all sorts, numerous ATVs and UTVs for the unpaved backcountry road touring, and all the clothing and special equipment to enhance their recreation experiences. These purchases also occur across many other States along with the manufacturing, distribution and service jobs created in support of vehicle assisted recreation.

Tourism expenditures from the high numbers of U.S. and world-wide visitors to the GCNRA are a considerable factor in contributing to the overall economic health in all Kane County communities. Special taxes support infrastructure needs and a sales tax helps fund the Kane County Hospital. Support services maintain and create many local jobs as well as jobs all along the travel routes used by all visitors en route to the CGNRA.

Studies of Off Highway Vehicle Recreation economic benefits have shown the annual economic benefit of \$4.2 billion dollars to the state of Arizona in 2002 and another recent study in Colorado indicates an annual state wide \$3 billion dollar benefit. Both studies report thousands of jobs created.

Corr. ID: 517

Organization: Kane County Commission

Comment ID: 175544

Organization Type: County Government

Representative Quote: Any loss of shoreline camping and unpaved road access for responsible visitors will significantly reduce these very far reaching and very positive economic stimulus generators.

Adequate recognition of the true value of shoreline access and unpaved road touring could also indicate to GCNRA Management that choosing to mitigate user effects is significantly more beneficial than generating the immediate and prolonged hidden costs of implementing unnecessary closures or restrictions.

Corr. ID: 530

Organization: *Not Specified*

Comment ID: 175948

Organization Type: Unaffiliated Individual

Representative Quote: 15. Page, AZ could have a positive economic impact from off-road travel.

Corr. ID: 532

Organization: *Not Specified*

Comment ID: 176003

Organization Type: Unaffiliated Individual

Representative Quote: Continue to allow ATV use on Hole-in-the-Rock Road - as it's important to the local economy.

TE4000 - Threatened And Endangered Species: Impact Of Proposal And Alternatives

Concern ID: 27388

CONCERN

STATEMENT:

One commenter stated that the NPS must consult with the USFWS regarding the federally listed species that occur in the NRA in order to comply with the ESA. In addition, the commenter stated that the NPS must assess the potential impacts of the ORV Management Plan on the state sensitive species and adopt the alternative that best conserves these species.

Representative Quote(s): **Corr. ID:** 542 **Organization:** Southern Utah Wilderness Alliance

Comment ID: 176125 **Organization Type:** Conservation/Preservation

Representative Quote: Comment: The Glen Canyon NRA has several federally listed and state sensitive species and/or has habitat for these species including: Colorado pike minnow (federally listed as endangered), humpback chub (federally listed as endangered), Townsend's bigeared bat, bluehead sucker, flannelmouth sucker, roundtail chub, yellow-billed cuckoo, bald eagle, long-billed curlew, black tern, burrowing owl, ferruginous hawk, osprey, peregrine falcon, big free-tailed bat, northern rock mouse, desert shrew, western red bat, fringed myotis, ringtail cat, cycladenia jonesii (federally listed as threatened), dalea flavescens var. epica, astragalus monumentalalis, phacelia puscella var. sabulonum, astragalus malcoides, sphaeralcea leptophylla var. janeae. NPS must consult with the USFWS for the federally listed species in order to comply with the ESA. In addition, NPS must assess the potential impacts of the ORV Management Plan on the state sensitive species and adopt the alternative that best conserves these species.

VE4000 - Visitor Experience: Impact Of Proposal And Alternatives

Concern ID: 27389

CONCERN

STATEMENT:

Commenters stated that education is an important aspect of this plan, particularly in order to educate ORV users why certain areas are closed to ORV traffic.

Representative Quote(s): **Corr. ID:** 143 **Organization:** SUWA

Comment ID: 172309 **Organization Type:** Unaffiliated Individual

Representative Quote: I feel it is very important, especially now, to protect the natural resources and public lands from ORV impacts, to promote public safety of all users of those lands, and to minimize impacts to natural resources and the conflicts among various users of those lands, and to allow ATV and other ORV use on routes and in "open areas" only after NPS has determined that such use will not affect the natural, aesthetic or scenic values of the areas in which the routes or "open" areas are located.

Please comply with Executive order 11644 governing ORV use in the GCNRA. The quality of our public lands, not just for ourselves but also for future generations, depends on your prudent, firm, unswerving stewardship. Please don't allow core values to be compromised to placate temporary private interests.

Further, I urge you especially to protect lands recommended for wilderness designation, as well as the irreplaceable cultural resources of the GCNRA from the impacts of off-road vehicle use.

Corr. ID: 514 **Organization:** *Not Specified*

Comment ID: 175262 **Organization Type:** Unaffiliated Individual

Representative Quote: while it may necessary to close or severely restrict access to certain routes, it is vitally important that users be educated about why the closure was absolutely necessary. Indiscriminate restrictions and closures tend to (1) frustrate users, (2) create resentment toward all regulations, and (3) does not equate to management but rather to a lack of management.

In light of these observations, I would urge the general adoption of Alternative A with the changes that I have mentioned above.

Corr. ID: 533 **Organization:** *Not Specified*

Comment ID: 176027 **Organization Type:** Unaffiliated Individual

Representative Quote: There needs to be education; there needs to be signs; there needs to be consequences (of breaking the laws). There needs to be maps made available.

VH100 - VALUES - Value the history or cultural resources

Concern ID: 27390

CONCERN STATEMENT: [Commenters urged the park to protect the cultural resources within the NRA.](#)

Representative Quote(s): **Corr. ID:** 118 **Organization:** *Not Specified*

Comment ID: 172181 **Organization Type:** Unaffiliated Individual

Representative Quote: Finally, please protect the lands recommended for wilderness designation and the irreplaceable cultural resources of the GCNRA from the impacts of off-road vehicle use.

Corr. ID: 225 **Organization:** suwa. welc, Wild Earth Guardians....

Comment ID: 173516 **Organization Type:** Unaffiliated Individual

Representative Quote: I urge minimizing the impacts of ORV use in the GCNRA as follows:

I have visited the GCNRA for hiking, backpacking and kayaking and simply enjoying the scenery several times. I find my greatest enjoyment comes from experiencing the area in its natural state plus undisturbed cultural resources.

Roads themselves and the impacts from ORV/ATV access within a few hours walk of cultural and historical sites and of interesting geological forms, plant sites and animal viewing sites generally results in their degradation in my experience. Roads destroy cryptogamic (organic) soils and disturb other soils resulting in dust and erosion from ORV use. I thrill at viewing animals in their natural habitat, but when that habitat is disturbed by ORV access, viewing is less likely for some species. ORV access appears to result in illegal hunting sometimes too.

Corr. ID: 238 **Organization:** citizen

Comment ID: 173679 **Organization Type:** Unaffiliated Individual

Representative Quote: My family and I are most concerned about the negative impact human beings and vehicles have on this beautiful, irreplaceable environment. We are professional archaeologists and know all

too well the results of human impact on archaeological sites. ORV bring in poachers, pot hunters, pollution and ruin the quiet of the wilderness, impacting other flora and fauna negatively. It is impossible to hike with ORV on the paths. They are noisy and ruin the effect of being in the wild. LEAVE THE ENVIRONMENT ACCESSIBLE AND REDUCE THE IMPACT OF VEHICLES. DO NOT ALLOW ORV'S IN THE UTAH WILDERNESS!!!!!!!!!!!!!!!!!!!!

Corr. ID: 253 **Organization:** *Not Specified*

Comment ID: 173964 **Organization Type:** Unaffiliated Individual

Representative Quote: The cultural sites and wildlife habitat, not to mention the truly wild aspect of the undeveloped lands must be preserved. Allowing or increasing access to off road vehicles in these areas mitigates against the continued maintenance and protection of these functions.

VN100 - VALUES - Value the natural resources or setting (flora, fauna, views, natural quiet, undeveloped areas)

Concern ID: 27391

CONCERN STATEMENT: One commenter stated that they would not be able to enjoy the natural resources and scenery within the NRA if they were prohibited from driving ORVs.

Representative Quote(s): **Corr. ID:** 108 **Organization:** *Not Specified*

Comment ID: 172170 **Organization Type:** Unaffiliated Individual

Representative Quote: I am a 67 year old Viet Nam Veteran, and retired after 29 years of service with the North Las Vegas Police Department. My years of service have taken a toll on me physically, with two bad knees rendering me to be mostly disabled. However, my wife Jan, (who is also 67) and I still enjoy going out camping, sightseeing and riding our ATV's. Residing east of Kanab, Utah, we recreate on our ATV's in some fashion almost every week. We are volunteer OHV Instructors for Utah Parks and have trained numerous people in OHV safety and the use of OHV's in a responsible manner. I have volunteered my time and service in various ways to the Grand Staircase, Escalante National Monument.

Jan and I have experienced and enjoyed riding our ATV's on many of the routes in the southern section of the Grand Staircase, Escalante National Monument and many other routes in Southern Utah and Northern Arizona. We are both proud members of the Utah/Arizona ATV Club of Kanab, Utah. This organization has demonstrated by example the responsible use of OHV's and through its volunteerism, contributes to conserving the beauty and enjoyment of our public lands.

My wife and I both individually or with our ATV Club visit and enjoy riding the roads of the Glen Canyon National Recreational Area frequently. The vast majority of our ATV Club members are senior citizens and many like me would not be able to visit and enjoy the Glen Canyon National Recreational Area backcountry if it were not for our ability to ride our ATV's. As for my wife and I, we would not be physically able to enjoy the many overlooks and back country sights of the Glen Canyon National Recreational area if you choose to close designated roads to ATV's. Additionally, we would be prevented from passing through the Recreational Area while riding routes within the Grand Staircase, Escalante National Monument that enter, exit or pass through the Glen Canyon National

Recreational Area.

VS4000 - Visitor Conflicts And Safety: Impact Of Proposal And Alternatives

Concern ID: 27392

CONCERN STATEMENT: Commenters stated that ORV use and lack of trail maintenance within the NRA would result in negative impacts to visitors' health and safety.

Representative Quote(s): **Corr. ID:** 303 **Organization:** National Parks And Conservation Association

Comment ID: 174670 **Organization Type:** Unaffiliated Individual

Representative Quote: My family, and I, visit our national parks to escape the modern trappings of noise, high-speed living, and high-speed thrill machines. We truly appreciate the beauty, and solace, a good hike affords those willing to invest the time, and energy, to escape into wilderness. It renews the human soul, and brings a sense of hope, and well-being. Here in Wisconsin, in our state, and national forests, I have seen the results of OVR use. Trash, noise, fumes, damaged topography, (Ruts, and erosion.) and waterways, are all part, and parcel, of OVR operation here. If you show me an authorized OVR trail, I'll show you three more unauthorized trails, forged by OVR riders for their own convenience, at the expense of the forest topography. Every year, deaths result in the operation of ORV's. If people want thrills on high speed rides, they should go to an amusement park, not a national park. Despite the many challenges our national parks face,(IE. Encroachment of human development, mining, timber operations, and underfunding.) they remain the breathtaking crown jewels of America. Let's keep them that way, by keeping them OVR free zones.

Corr. ID: 434 **Organization:** *Not Specified*

Comment ID: 175794 **Organization Type:** Unaffiliated Individual

Representative Quote: One little-addressed issue when dealing with ORV use is the safety element involved with ORVs and maintained dirt roads. I have personally witnessed one near-fatal crash, and know of a colleague who lost a spouse due to ORVs being driven too fast on approved roads.

I think the roads in the GCNRA give the illusion of safety and accessibility, in that people think their traffic is permissible, and therefore supported. This is accompanied by forgetting how far they would be from emergency care. Promoting mixed use on the access roads will only increase the number of accidents from ORV's being driven like automobiles in a manner that affects people's health and well-being.

Corr. ID: 517 **Organization:** Kane County Commission

Comment ID: 175495 **Organization Type:** County Government

Representative Quote: In addition to the legal and coordination requirements addressed above, the GCNRA should consider the health and safety of people travelling the NRA for a variety of purposes ranging from recreation to ranching. The GCNRA's refusal to maintain the roads within the NRA that it claims to own and over which it exercises unilateral management authority has resulted in wide-extant public safety hazards existing on roads within the NRA. The lack of federal road maintenance has resulted in private persons, primarily ranchers, performing or contracting for road maintenance on roads within the NRA. The welfare of the travelling public using ATVs, motorcycles, jeeps and conventional vehicles should be addressed through coordination with the County to resolve the jurisdiction of roads within the NRA.

Corr. ID: 523 **Organization:** National Parks Conservation Association

Comment ID: 175309 **Organization Type:** Unaffiliated Individual

Representative Quote: Although we understand the challenges with limited staff capacity, it is essential that GCNRA assess issues such as: ...existing and future ORV/ATV related regulations to protect visitors and resources.

Corr. ID: 542 **Organization:** Southern Utah Wilderness Alliance

Comment ID: 176104 **Organization Type:** Conservation/Preservation

Representative Quote: Comment: In light of the recent USGS report (Beisner et al. 2007, SIR 2010-5108)(Footnote: Beisner, K.R., Marston, T.M., Naftz, D.L., Snyder, Terry, and Freeman, M.L., 2010, Assessment of nonpoint source chemical loading potential to watersheds containing uranium waste dumps and human health hazards associated with uranium exploration and mining, Red, White, and Fry Canyons, southeastern Utah, 2007: U.S. Geological Survey Scientific Investigations Report 2010-5108,30 p.) that found off-road vehicle users in the vicinity of Red, White, and Fry Canyons to be exposed to radiation levels from uranium-contaminated dust that exceeded EPA limits, we strongly urge NPS to incorporate this information into its analysis. Glen Canyon NRA campgrounds in this area include Red Canyon, Blue Notch, White Canyon, and Farley Canyon. We request that NPS prohibit ATV use on the routes leading to these campsites and to prohibit all off-road vehicle use to help minimize the fugitive dust created by motor vehicle use in this area to protect the health and safety of visitors. And, as noted above, the routes leading to the Red Canyon and Blue Notch campsites are located on BLM land proposed for wilderness and we urge NPS to prohibit all motor vehicle use on these routes. NPS should also consider the locations of other abandoned mines when finalizing the Off-Road Vehicle Management Plan.

Concern ID: 27528

CONCERN STATEMENT: Commenters suggested that safety requirements should be included in the ORV management plan, and consistent with state law.

Representative Quote(s): **Corr. ID:** 531 **Organization:** *Not Specified*

Comment ID: 175984 **Organization Type:** Unaffiliated Individual

Representative Quote: Safety equipment should be consistent with state law (e.g. helmets).

Corr. ID: 532 **Organization:** *Not Specified*

Comment ID: 176007 **Organization Type:** Unaffiliated Individual

Representative Quote: Promote safety and safety gear - water, rain gear (no stores nearby). Even for driving (e.g. sedans going down Hole-in-the-Rock Road).

Concern ID: 27529

CONCERN STATEMENT: One commenter suggested that the scoping brochure failed to inform the public that some conventional vehicles have the same "modifications" as ATV, and that these modifications are strictly for safety.

Representative Quote(s): **Corr. ID:** 543 **Organization:** *Not Specified*

Comment ID: 176011 **Organization Type:** Unaffiliated Individual

Representative Quote: The same lack of an unbiased evaluation could be evident in the booklets definition of a street legal ATV (page 4) in that the printed definition refers to "modifications" to all-terrain type vehicles but fails to educate the reader that the modifications are strictly of a safety nature that are the same as those that are required in "conventional vehicles" using

the GCRA roads. Could the lack of any knowledge of the safety aspects cause a scoping commenter to form an incorrect understanding and application of the type of "modification" to these vehicles and submit a wrongful comment? Did GCRA have a duty to provide a full and complete definition?

Concern ID: 27530

CONCERN STATEMENT: One commenter stated that the NRA should not exclude state licensed vehicle use on open roads without an in-depth study justifying such actions.

Representative Quote(s): **Corr. ID:** 543 **Organization:** *Not Specified*

Comment ID: 176013 **Organization Type:** Unaffiliated Individual

Representative Quote: Street legal requirements and applications to ATVs and ATV operators are a functioning aspect in several states and provide the Federal Agencies an increased level of control over the "uncontrolled ATV use" while also providing both the "outdoor recreation" for responsible use and the "protection" of the environment for everyone GCRA should not exclude State licensed vehicle use on open roads without an in-depth study justifying such actions.

VU4000 - Visitor Use: Impact Of Proposal And Alternatives

Concern ID: 27393

CONCERN STATEMENT: Commenters suggested that restricting or prohibiting ORV use within the NRA would significantly reduce visitor use. One commenter suggested that the NPS establish a baseline evaluation for visitor use and address the potentially significant impact.

Representative Quote(s): **Corr. ID:** 14 **Organization:** Capital Trail Vehicle Association

Comment ID: 175907 **Organization Type:** Unaffiliated Individual

Representative Quote: In all of the hundreds of federal actions in the past 7 years, we have yet to see a meaningful evaluation this cumulative effect. It seems that the BLM, Forest Service, and NPS are using planning and travel management planning as an opportunity to close as many motorized recreational opportunities as fast as possible. We are asking that this project establish a baseline evaluation and address this significant impact.

Corr. ID: 544 **Organization:** UT/AZ ATV club

Comment ID: 176057 **Organization Type:** Unaffiliated Individual

Representative Quote: For the record, my name is Ray Wells. I live in Kanab Utah, along with my wife Sharon. I am the current president of the UT/AZ ATV club, and my wife is secretary. We are both seniors and active outdoor people. We love to hike, camp and ride our ATV's. We have hiked to the bottom of the Grand Canyon more than once. My son and I hiked rim to rim last November. But those days are done for my wife due to age and knee surgery and I'm not that far behind. Physical restrictions don't curb our desire to recreate in the outdoors, just the way we have to do it! ATV's have made it possible for us to continue to enjoy the outdoors.

With that in mind, I don't feel that any of your alternatives are fair, for there are no increased recreation opportunities for people like us. Just the opposite is true, you are considering limiting our opportunities not enhancing them. You are managing a RECREATION AREA, not a Park! Please keep that in mind as you make your decisions!

Concern ID: 27532
CONCERN STATEMENT: One commenter stated that conventional motor vehicle use will be significantly impacted by the implementation of the plan.
Representative Quote(s): **Corr. ID:** 505 **Organization:** *Not Specified*
Comment ID: 176097 **Organization Type:** Unaffiliated Individual
Representative Quote: CONVENTIONAL MOTOR VEHICLES:
The ORV Plan states, "Use of conventional motor vehicles on all GMP roads is not within the scope of this plan" (page 3, Scope of this ORV Management Plan/EIS). However, that statement is not completely accurate for two reasons. First, many "conventional motor vehicles" are capable of traversing terrain similar to that of ATVs/ORVs and are often used as such. Second, many of the areas being considered in the ORV Plan are used frequently for shoreline accessibility by conventional! motor vehicles. Conventional motor vehicle use will be significantly impacted by the implementation of the final plan. As such, some of my comments will include issues relating to conventional motor vehicles.

Concern ID: 27534
CONCERN STATEMENT: One commenter stated that restricting roads and access routes by designating them as "Administrative Use Only" offends the public and encourages off road travel.
Representative Quote(s): **Corr. ID:** 520 **Organization:** *Not Specified*
Comment ID: 176092 **Organization Type:** Unaffiliated Individual
Representative Quote: The restriction of roads and access routes by designation as "administrative use only" is offensive to the public. "Administrative use only" roads should only be designated for roads in developed areas to protect NPS facilities ... designation of remote roads as "AUO" serves only to lock out visitors from areas of valuable interest, and further encourages "off road travel".

VV100 - VALUES - Value the visitor opportunities (activities, programs, recreation)

Concern ID: 27394
CONCERN STATEMENT: Commenters noted the values they place on visitor opportunities at the NRA, including ORV travel, camping, hiking, kayaking, and fishing.
Representative Quote(s): **Corr. ID:** 14 **Organization:** Capital Trail Vehicle Association
Comment ID: 175902 **Organization Type:** Unaffiliated Individual
Representative Quote: We feel strongly about OHV recreation for the following reasons:

Enjoyment and Rewards of OHV Recreation

- Opportunity for a recreational experience for all types of people.
- Opportunity to strengthen family relationships.
- Opportunity to experience and respect the natural environment.
- Opportunity to participate in a healthy and enjoyable sport.
- Opportunity to experience a variety of opportunities and challenges.
- Camaraderie and exchange of experiences.

Acknowledged Responsibilities of Motorized Visitors

- Responsibility to respect and preserve the natural environment. We are practical environmentalists who believe in a reasonable balance between the protection of the natural environment and the human environment.

- Responsibility to respect all visitors.
- Responsibility to use vehicles in a proper manner and in designated places.
- Responsibility to work with land, resource, and recreation managers. We are committed to resolving issues through problem solving and not closures.
- Responsibility to educate the public on the responsible use of motorized vehicles on public lands.

Corr. ID: 75 **Organization:** *Not Specified*

Comment ID: 175421 **Organization Type:** Unaffiliated Individual

Representative Quote: For more years than I can remember I have enjoyed camping, kayaking, and fishing on the shores of Lake Powell. Families like mine would like to pass along that tradition of heading to that "little-known special spot" on the lake.

Corr. ID: 114 **Organization:** BlueRibbon Coalition

Comment ID: 175275 **Organization Type:** Unaffiliated Individual

Representative Quote: We would be remiss if we did not pass along the concerns of BRC's members and supporters who contacted us and who regularly visit GCNRA and utilize its unpaved roads for recreation and access to the NRA. While many families and younger folks enjoy areas such as Lone Rock, the vast majority of our members who enjoy traveling the unpaved roads within the NRA are elderly and disabled. At least two members who contacted us are Veterans. They use unlicensed and licensed ATVs and UTVs to enjoy the spectacular and remote landscapes offered by the NRA. The opportunity available for this type of recreation has been drastically reduced over the years . The unpaved roads existing in the GCNRA offer some of the last remaining opportunity available for this type of use. Our members have asked us to amplify some specific concerns in these comments and wish us to point out that the vast majority of Off Highway Vehicle (OHV) recreationists are law-abiding citizens who regularly partner with the Bureau of Land Management and other agencies to manage OHV use. They also care very deeply about protecting the environment. They have asked us to encourage you not to let the "threat" of impacts, or any other undocumented concerns expressed by the staff or via public comments, be used as a rationale to close these roads to licensed or unlicensed ATVs and UTVs .

Corr. ID: 230 **Organization:** SUWA

Comment ID: 173573 **Organization Type:** Unaffiliated Individual

Representative Quote: I am an avid kayaker and enjoy multiple trips per year to Lake Powell to find solitude and spectacular scenery. Being that it is hard to find places on the lake that are free from the noise and site of motor boats, it is refreshing to be able to hike up the side canyons. If ORV's/ATV's are allowed to access so many areas, the capability to find solitude will be very difficult. There are enough existing places for ORV's/ATV's to use throughout Utah. An NPS land should be very restrictive of such vehicles since so many other lands are not.

WH4000 - Wildlife And Wildlife Habitat: Impact Of Proposal And Alternatives

Concern ID: 27395

CONCERN STATEMENT: Commenters stated that ORV use within the NRA has the potential to negatively impact wildlife and wildlife habitat.

Representative Quote(s): **Corr. ID:** 351 **Organization:** Maryland Ornithological Society

Comment ID: 176051 **Organization Type:** Unaffiliated Individual

Representative Quote: Protect Wildlife Values

In the 1.2 million acres of GCNRA, 315 species of birds have been recorded, among them 80 species that breed here. Diverse wildlife habitats support diverse bird populations, from aquatic birds on Lake Powell reservoir to raptors and desert birds in the remote canyons and mesas. Notable species include Bald and Golden Eagles, California Condor (reintroduced), Peregrine Falcon, Mexican Spotted Owl, White-throated Swift, Southwestern Willow Flycatcher, Juniper Titmouse, Rock Wren, Canyon Wren, Green-tailed Towhee and Black-throated Sparrow. Some notable mammals are desert bighorn sheep, mule deer, bison (reintroduced), Ord's kangaroo rat, four species of woodrats, and mountain lion.

Tributaries such as the Escalante River, Dirty Devil River and many side canyons contain riparian habitat that serves as migration corridors for migrant birds moving across the arid Colorado Plateau in spring and fall. MOS members saw these canyons loaded with migrating birds on a visit early in May. They also saw riparian habitat damaged by ORVs on BLM public lands near Glen Canyon. We ask NPS to protect this habitat by keeping ORVs out of these canyons within the NRA. In addition, NPS management should not promote or facilitate ORVs riding into contiguous BLM canyon habitat. The EIS should analyze ORVs' impacts on wildlife habitat, with attention to specific routes and the wildlife and wilderness values affected by each.

Corr. ID: 360

Organization: *Not Specified*

Comment ID: 176138 **Organization Type:** Unaffiliated Individual

Representative Quote: Impacts from ORVs are great, from noise to rutting roads, to driving on sensitive soil, to cutting new pathways, to ruining wildlife and habitat patterns.

Corr. ID: 542

Organization: Southern Utah Wilderness Alliance

Comment ID: 176126 **Organization Type:** Conservation/Preservation

Representative Quote: Examples of direct, indirect and cumulative impacts of motor vehicle routes on wildlife and their habitats identified in the biological sciences literature include:

- Fragmentation of connected habitats including the loss of core habitat areas and habitat connectivity for wildlife movements and dispersal;
- Adverse genetic effects such as reducing genetic diversity by isolating populations;
- Increased potential for extirpation of localized populations or extinction of narrowly distributed species from catastrophic events;
- Modifications of animal behavior through reductions in habitat use due to human activity and interference with wildlife functions such as courtship, nesting, and migration;
- Disruption of the physical environment in many ways including direct removal of habitat due to route construction, reduction of cover and habitat security, increasing dust and erosion;
- Alteration of the chemical environment through vehicle emissions and herbicides;
- Changes in habitat composition by direct loss of vegetation from road construction and changes in microclimates in road edge habitats potentially resulting in changes in type and quality of food base and reduction in habitat cover;
- Spread of exotic species that may lead to competition with preferred forage species;
- Degradation of aquatic habitats through alteration of stream banks and increased sediment loads;

- Changes to flows of energy and nutrients such as changes in temperatures in microclimates created at road edges;
- Increased alteration and use of habitats by humans through activities including increased unethical hunting practices and increased dispersion of recreation impacts, particularly by off-road vehicles due to a proliferation of roads;
- Mortality from construction of roads;
- Mortality from collisions with vehicles.

See Trombulak and Frissell 2000.

Concern ID: 27538

CONCERN STATEMENT: One commenter stated that the NPS must analyze and assess the impacts of ORV use to natural resources for each route and "open" area proposed for ORV use and disclose its analysis to the public.

Representative Quote(s): **Corr. ID:** 542 **Organization:** Southern Utah Wilderness Alliance
Comment ID: 176127 **Organization Type:** Conservation/Preservation

Representative Quote: There are many ways to measure habitat fragmentation to determine where and how impacts should be mitigated. Three of the most useful metrics are road density, number and size of core areas, and distance to a road. Road density can be calculated by measuring the length of road divided by the area in a given region and reported as miles of road per square mile (mi/mi²). Core areas are defined as the area of land beyond a given distance, or road effect zone, from transportation routes. See Richard T. T. Forman, Horizontal Processes, Roads, Suburbs, Societal Objectives and Landscape Ecology, Landscape Ecological Analysis: Issues and Applications at 35-53 (Springer-Verlag, New York) (1999). The number and sizes of core areas can be measured, as can the total amount of core area beyond a given distance or effect zone from roads. Because wildlife species respond at varying distances to road disturbances (and depending on the road type and activity level), it is important to determine measures of core area for a range of effect zone widths associated with disturbances for specific species (e.g., of 100 ft., 500 ft. and 1320 ft.). Measuring the amount of land within a given distance to a road or within an effect zone is the inverse of measuring the acreage of core areas, and represents a measure of the affected habitat.

Comment: In formulating the Glen Canyon ORV Management Plan, NPS must pay particular attention to the effects that roads and other motor vehicle routes and "open" play areas may have on the wildlife habitat and the fragile ecosystems in the NRA. In order to comply with the requirements of NEPA, NPS must conduct an analysis of the direct, indirect and cumulative impacts of the ORV management alternatives on wildlife habitat fragmentation and use this information to inform its ORV management decisions and mitigate impacts of route designations, and ORV and other motor vehicle use on wildlife habitat.

Corr. ID: 542 **Organization:** Southern Utah Wilderness Alliance
Comment ID: 176099 **Organization Type:** Conservation/Preservation

Representative Quote: **Comment:** NPS must analyze and assess the impacts of ORV use to natural and cultural resources, and other recreational users for each route and "open" area proposed for ORV use and disclose its analysis to the public so that the decision-maker and the public will have the necessary information to form an opinion as to whether ORV use on the proposed routes and areas will minimize the impacts to the natural and cultural resources, as required by the Executive Order.

Corr. ID: 542 **Organization:** Southern Utah Wilderness Alliance

Comment ID: 176128 **Organization Type:** Conservation/Preservation

Representative Quote: Comment: NPS should include the above-mentioned fragmentation metrics, or a similar quantification, in its analysis to provide NPS decision-makers and the public with the necessary information to adopt an informed ORV management alternative with respect to wildlife habitat.

Comment Distribution by Code

Code	Description	# of Comments	% of Comments
AE 24000	Affected Environment: Wilderness	134	7.21%
AE 25000	Affected Environment: Water Quality	7	0.38%
AE 5050	Affected Environment: Wetlands/Riparians	3	0.16%
AE 7050	Affected Environment: Noise	12	0.65%
AE 9050	Affected Environment: Invasive Species	2	0.11%
AE1000	Affected Environment: Geologic Resources	1	0.05%
AE12000	Affected Environment: Wildlife And Wildlife Habitat	9	0.48%
AE13000	Affected Environment: Cultural Resources	3	0.16%
AE19000	Affected Environment: Other Agencies' Land Use Plans	32	1.72%
AE2000	Affected Environment: Soils	10	0.54%
AE21000	Affected Environment: Socioeconomics	1	0.05%
AE22000	Affected Environment: Visitor Use	3	0.16%
AE26000	Affected Environment: Solitude	12	0.65%
AE7000	Affected Environment: Air Quality	10	0.54%
AE7055	Affected Environment: Noise (Non-Substantive)	1	0.05%
AE8000	Affected Environment: Visual Quality	10	0.54%
AE9000	Affected Environment: Vegetation	3	0.16%
AL 4090	Oppose all ORVs in backcountry/ Wilderness	59	3.18%
AL 5000	Oppose all ATVs	26	1.40%
AL 5005	Oppose all ORVs in park	108	5.81%
AL 5010	Support ORV use	126	6.78%
AL 5020	Oppose new roads/ORV areas	11	0.59%
AL 5030	Support new roads/ORV areas	23	1.24%
AL 5040	Support ORV Accessible Shorelines	19	1.02%
AL 5060	Recognize RS 2477ROWS	25	1.35%
AL 5080	Better manage ORV use	93	5.01%
AL 5085	Street-legal / Non-street legal ATVs	55	2.96%
AL 5090	Close specific routes	24	1.29%

Code	Description	# of Comments	% of Comments
AL10000	Alternatives: Alternative E	6	0.32%
AL10100	Alternatives: Support Alternative E	10	0.54%
AL10200	Alternatives: Oppose Alternative E	5	0.27%
AL11000	Alternatives: Access for those with Disabilities	42	2.26%
AL11500	Alternatives: Access for those with Disabilities (Non-Substantive)	1	0.05%
AL4000	Alternatives: New Alternatives Or Elements	179	9.63%
AL5075	Suggestions for Fees	6	0.32%
AL5095	Open Specific Routes	55	2.96%
AL5097	ORVs not appropriate in all areas	32	1.72%
AL6000	Alternatives: Alternative A	8	0.43%
AL6100	Alternatives: Support Alternative A	116	6.24%
AL6200	Alternatives: Oppose Alternative A	4	0.22%
AL7000	Alternatives: Alternative B	3	0.16%
AL7100	Alternatives: Support Alternative B	8	0.43%
AL7200	Alternatives: Oppose Alternative B	2	0.11%
AL8000	Alternatives: Alternative C	3	0.16%
AL8100	Alternatives: Support Alternative C	7	0.38%
AL8200	Alternatives: Oppose Alternative C	3	0.16%
AL9000	Alternatives: Alternative D	15	0.81%
AL9100	Alternatives: Support Alternative D	40	2.15%
AL9200	Alternatives: Oppose Alternative D	3	0.16%
CC1000	Consultation and Coordination: General Comments	32	1.72%
ED1000	Editorial	11	0.59%
GA1000	Impact Analysis: Impact Analyses	52	2.80%
GA3000	Impact Analysis: General Methodology For Establishing Impacts/Effects	8	0.43%
MT1000	Miscellaneous Topics: General Comments	101	5.44%
ON1000	Other NEPA Issues: General Comments	18	0.97%
PN1000	Purpose And Need: Planning Process And Policy	21	1.13%
PN2000	Purpose And Need: Park Purpose And Significance	50	2.69%

Code	Description	# of Comments	% of Comments
PN3000	Purpose And Need: Scope Of The Analysis	52	2.80%
PN4000	Purpose And Need: Park Legislation/Authority	31	1.67%
PN6000	Purpose And Need: Land Management Laws, Exec Orders	142	7.64%
PN8000	Purpose And Need: Objectives In Taking Action	3	0.16%
PN9000	Purpose And Need: Issues And Impact Topics Selected For Analyses	3	0.16%
PO4000	Park Operations: Impact Of Proposal And Alternatives	12	0.65%
SE4000	Socioeconomics: Impact Of Proposal And Alternatives	17	0.91%
TE4000	Threatened And Endangered Species: Impact Of Proposal And Alternatives	2	0.11%
TQ0001	Topic Question 1	258	13.89%
TQ0002	Topic Question 2	243	13.08%
VE4000	Visitor Experience: Impact Of Proposal And Alternatives	20	1.08%
VH100	VALUES - Value the history or cultural resources	103	5.54%
VN100	VALUES - Value the natural resources or setting (flora, fauna, views, natural quiet, undev. areas)	137	7.37%
VS4000	Visitor Conflicts And Safety: Impact Of Proposal And Alternatives	12	0.65%
VU4000	Visitor Use: Impact Of Proposal And Alternatives	8	0.43%
VV100	VALUES - Value the visitor opportunities (activities, programs, recreation)	39	2.10%
WH4000	Wildlife And Wildlife Habitat: Impact Of Proposal And Alternatives	11	0.59%
XX100	Duplicate/Blank Comment	22	1.18%
Total		1858	100.00%

Distribution by Correspondence Type

Type	# of Correspondences	% of Correspondences
Other	6	1.08%
Web Form	479	86.00%
Park Form	23	4.13%
Letter	43	7.72%
E-mail	6	1.08%
Total	557	100.00%

Correspondence by Organization Type

Organization Type	# of Correspondences	% of Correspondences
Town or City Government	1	0.18%
County Government	2	0.36%
Business	2	0.36%
Federal Government	1	0.18%
Conservation/Preservation	3	0.54%
Recreational Groups	13	2.33%
State Government	1	0.18%
Unaffiliated Individual	534	95.87%
Total	557	100.00%

Correspondence Distribution by State

State	# of Correspondences	% of Correspondences
AK	3	1%
AR	2	0%
AZ	52	9%
CA	44	8%
CO	47	8%
CT	1	0%
DC	2	0%
DE	1	0%
FL	3	1%
GA	3	1%
HI	1	0%
IA	1	0%
ID	1	0%
IL	6	1%
IN	2	0%
KS	1	0%
KY	1	0%
MA	6	1%
MD	6	1%
MI	3	1%
MN	3	1%
MO	5	1%
MT	6	1%
NC	7	1%
NH	1	0%
NJ	6	1%
NM	18	3%

State	# of Correspondences	% of Correspondences
NV	7	1%
NY	10	2%
OH	6	1%
OK	2	0%
OR	15	3%
PA	6	1%
SC	1	0%
SD	2	0%
TN	1	0%
TX	6	1%
UN	6	1%
UT	235	42%
VA	6	1%
VT	2	0%
WA	14	3%
WI	3	1%
WY	1	0%
Total	557	100%