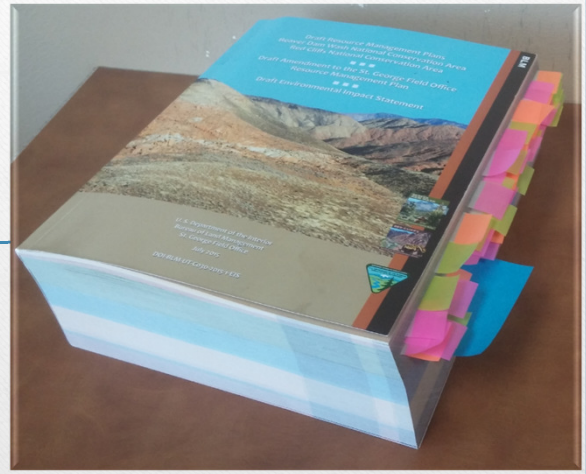
BLM Draft RMP Concerns

Proposals that may negatively affect the county, municipalities, and other interested local groups.



General Background Information



- Resource Management Planning – process and implications
- Washington County Lands Bill
- Current, one-sided, nature of most comments

California Condors

Table 2-15 Special Status Bird Species: California Condor

Table 2-15 Special Status Bird Species: California Condor			
Alternative A (No Action)	Alternative B	Alternative C	Alternative D
Goal			
	California condor (*Gymnogyps californianus*) populations that may utilize habitats in the NCA would be stable or increasing, helping to meet recovery and delisting goals for this species.		
Objectives			
No similar action.	Native vegetation communities and riparian areas sustain potential roosting sites and a high quality prey base for California condors. Environmental hazards that may affect California condors are reduced or eliminated.		
Management Guidance Common to All Alternatives			
Management of habitat would be consistent with the *Recovery Plan for the California Condor* (USFWS 1996) and Biological Opinions issued by USFWS.			
Management Actions			
No similar action.	Authorize the reintroduction, translocation, and supplemental releases of California condors into historic habitats in coordination with USFWS. Maintain a database of observations of California condors and their prey should they be observed using the NCA. Coordinate with partners (e.g., UDWR, National Audubon Society, National Wildlife Federation) to promote the use of non-lead ammunition in the NCA.		

RMP page 94

California Condors

California Condor

With a face only a mother could love, *Gymnogyps californianus* is a member of the vulture order. Like other vultures, condors are scavengers, feeding on dead mammals. The young, however, are fed by regurgitation. A wing span of nine to ten feet allows condors to soar on air currents to heights of 15,000 feet and travel hundreds of miles in one flight.

including 104 in the captive flock, and 17 in the wild. On October 16, 1996, USFWS announced plans to reintroduce California condors into northern Arizona and designate these birds as nonessential experimental populations, as provided by Section 10j of the ESA (USFWS 1996b). A portion of Washington County is within the experimental population area (USFWS 1996b; USOFR 1997); however, California condors observed in NCA would be outside the boundary of the experimental non-essential population areas, and subject to the full protection of the ESA.

3.11.1.4 Mojave Desert Tortoise

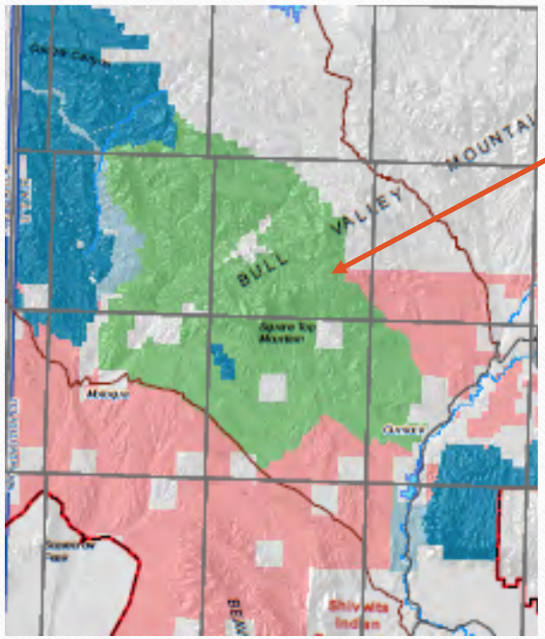
Since 1971, the population of desert tortoise (also known as Agassiz's land tortoise) on the Beaver Dam Slope (Slope) of southwestern Washington

Photo 3-43 California Condor, Federally-Listed Endangered Species



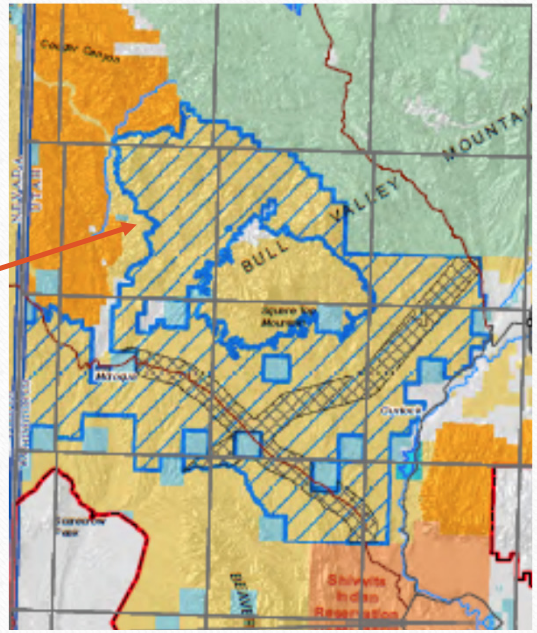
RMP page 392 and 213

Loss of ATV Open Ride Area



Current open ride area

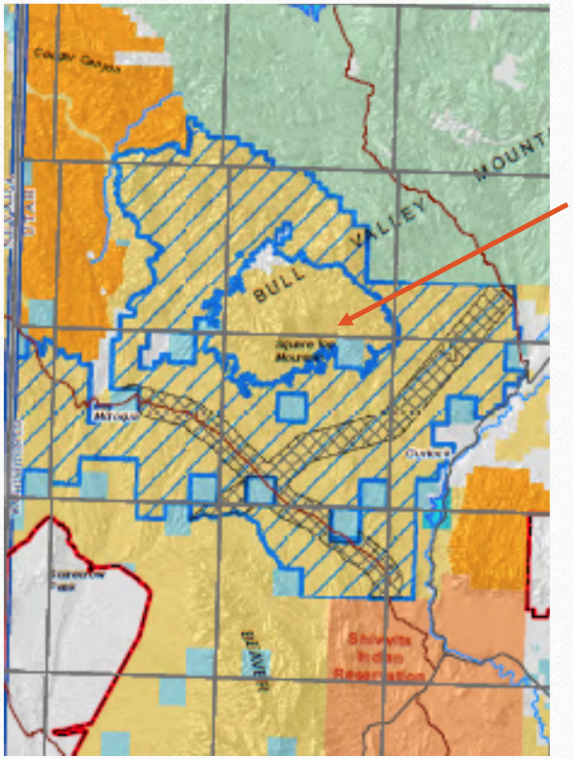
Proposed multi-species management area



RMP Page 320

RMP page 314

Bull Mountain Multi-Species Management Area



Current gold mining area

Table 2-71 Bull Valley Mountains Multi-Species Management Area

Table 2-71 Bull Valley Mountains Multi-Species Management Area			
Alternative A (No Action)	Alternative B	Alternative C	Alternative D
Goal			
	Fulfill the mandate from OPLMA at Section 1979 to identify and manage areas where biological conservation is a priority.		
Objectives			
No similar action.	Manage public lands to conserve and restore plant and animal species and natural communities.		
Management Actions			
No similar action.	As directed by OPLMA Section 1979 and supported by Secretarial Order 3289 and Executive Order 13443, identify and manage the approximately 87,031 acre Bull Valley Mountains Multi-Species Management Area (Management Area) as a priority biological conservation area. (Map 2-50).		
Land Tenure Adjustments:			
Public lands… may be transferred (other than under land sale authority) if subsequent analysis determines that such transfer will meet the land transfer criteria. (SGFO RMP LD-06)	Retain approximately 87,031 acres of public land in the Management Area in federal ownership. Acquire non-federal lands within the Management Area through purchase, exchange, transfer, or donation. Manage acquired lands consistent with the management prescriptions of the adjacent public lands.		

RMP pages 313-315

Special Recreation Management Area

Beaver Dam Wash

ERMA – Extensive Recreation Management Area

SRMA – Special Recreation Management Area

Alternative B →

Recreation and Visitor Services			
ERMA management would provide the minimum level of recreation management and opportunities.	Establishing SRMAs and RMZs in the NCA and increased public education efforts would provide more focused recreation opportunities and better visitor information. Also, some commercial, competitive, large-group, and camping opportunities could be reduced or have more restrictions because of efforts to protect special status species habitats. Expanding the non-motorized trail systems in the NCAs would increase opportunities for backpacking and hiking.	Impacts on recreation and visitor services would be similar to Alternative B, except increased efforts to protect critical habitats could increase some of the restrictions on recreation use.	Impacts on recreation and visitor services would be similar to Alternative B, except some restrictions on competitive events and camping would be reduced.

RMP Page 175

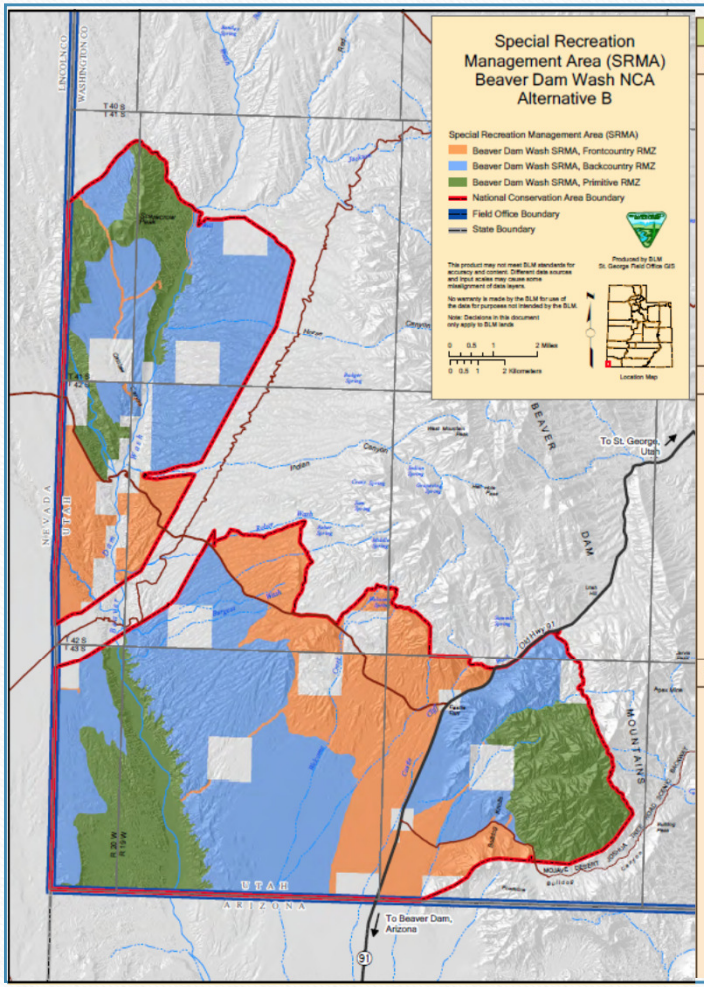


Table 2-32 Beaver Dam Wash NCA Recreation Management Zone Descriptions
FRONTCOUNTRY ZONE
• Accessed from Old Highway 91 and County roads. • Accommodates a large number of visitors. • Large number of management controls consisting primarily of directional, educational, and regulatory signs. • BLM staff presence is consistent. • Law enforcement patrols are irregular and often based on incident or emergency response. • Significant amount of infrastructure; includes all roads, parking, and future trailheads. • Motorized use is restricted to designated roads and trails. • Mechanized use is restricted to designated roads and trails. • Majority of zone is within critical tortoise habitat. • Outside of Congressionally designated road areas. • Varies in size by alternative.
BACKCOUNTRY ZONE
• Accessed from the Rural Zone trailheads or Frontcountry Zone trails. • Less recreational use than the Frontcountry Zone, but still accommodates a significant number of visitors. • Fewer management controls consisting primarily of directional and regulatory signs. • BLM staff presence is infrequent and generally based on project-specific need. • Law enforcement patrols generally limited to incident and emergency response. • Motorized use is restricted to administrative purposes and emergency response. • Mechanized use is restricted to designated trails. • Portions of zone are within critical desert tortoise habitat. • Corresponds with Congressionally designated road areas in all Alternative. • Varies in size by alternative.
PRIMITIVE ZONE
• Accessed from the Frontcountry or Backcountry Zones. • Accommodates the fewest number of visitors. • Limited management controls consisting primarily of directional and regulatory signs. • BLM staff presence is very low. • Law enforcement presence limited to emergency response. • Motorized use prohibited except for emergency response. • Cross-country travel is allowed. All visitors must be on foot or horseback. • No constructed or maintained trails. • Portions of zone are within critical tortoise habitat. • Corresponds with Congressionally designated road areas in all Alternative. • Varies in size by alternative.

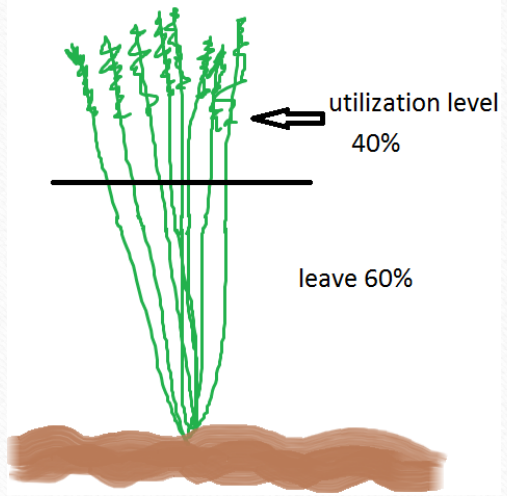
The Beaver Dam Wash SRMA would significantly restrict recreational uses in an area that is currently under the less restrictive ERMA.

Map RMP page 142

Definitions RMP page 156

Grazing

Table 2-11 Vegetation Resource Uses: Livestock Grazing			
Alternative A (No Action)	Alternative B	Alternative C	Alternative D
No similar action.	Establish grazing utilization levels at 40% of current year's growth on allotments in designated critical habitat for the desert tortoise.	Public lands within the NCA would be unavailable to grazing over the life of the RMP.	Establish grazing utilization levels at 45% of current year's growth on allotments in designated critical habitat for the desert tortoise.
No similar action.	When grazing permits and preference are voluntarily relinquished, the allotment or portion of the allotment associated with the permits within the NCA would no longer be available for livestock grazing over the life of the RMP.	Public lands within the NCA would be unavailable to grazing over the life of the RMP.	No similar action.



RMP page 84

Table 2-11 Vegetation Resource Uses: Livestock Grazing			
Alternative A (No Action)	Alternative B	Alternative C	Alternative D
place emphasis on nontortoise management (see Map 2.9). Winter grazing on these allotments will continue in accordance with current grazing prescriptions from November 1 to March 15. Otherwise, grazing will be managed in accordance with the *Desert Tortoise Recovery Plan*, BLM's Rangewide Desert Tortoise Plan, and other applicable studies. Provide 3,099 initial AUMs of livestock forage within the NCA. AUM numbers may be adjusted depending on the results of ongoing rangeland monitoring. Provide 3,099 initial AUMs of livestock forage within the NCA. AUM numbers may be adjusted depending on the results of ongoing rangeland monitoring. (Map 2-1)	a) Beaver Dam Slope; b) Castle Cliffs; c) Cedar Pocket; d) Scarecrow Peak. Provide 1,861 initial Animal Unit Months (AUMs) of livestock forage through a reduction of permitted use to the 20 year average of actual use in the NCA. AUM numbers may be adjusted depending on the results of ongoing rangeland monitoring. (Map 2-1)	a) Beaver Dam Slope; b) Castle Cliffs; c) Cedar Pocket; d) Scarecrow Peak; e) Within designated critical habitat for the Mojave desert tortoise within the ROW corridor that bisects the NCA. Eliminate 3,099 AUMs of livestock forage over the life of the RMP. (Map 2-2)	a) Beaver Dam Slope; b) Castle Cliffs; c) Cedar Pocket; d) Scarecrow Peak. Provide 3,099 initial AUMs of livestock forage within the NCA. AUM numbers may be adjusted depending on the results of ongoing rangeland monitoring. (Map 2-1)



RMP page 81

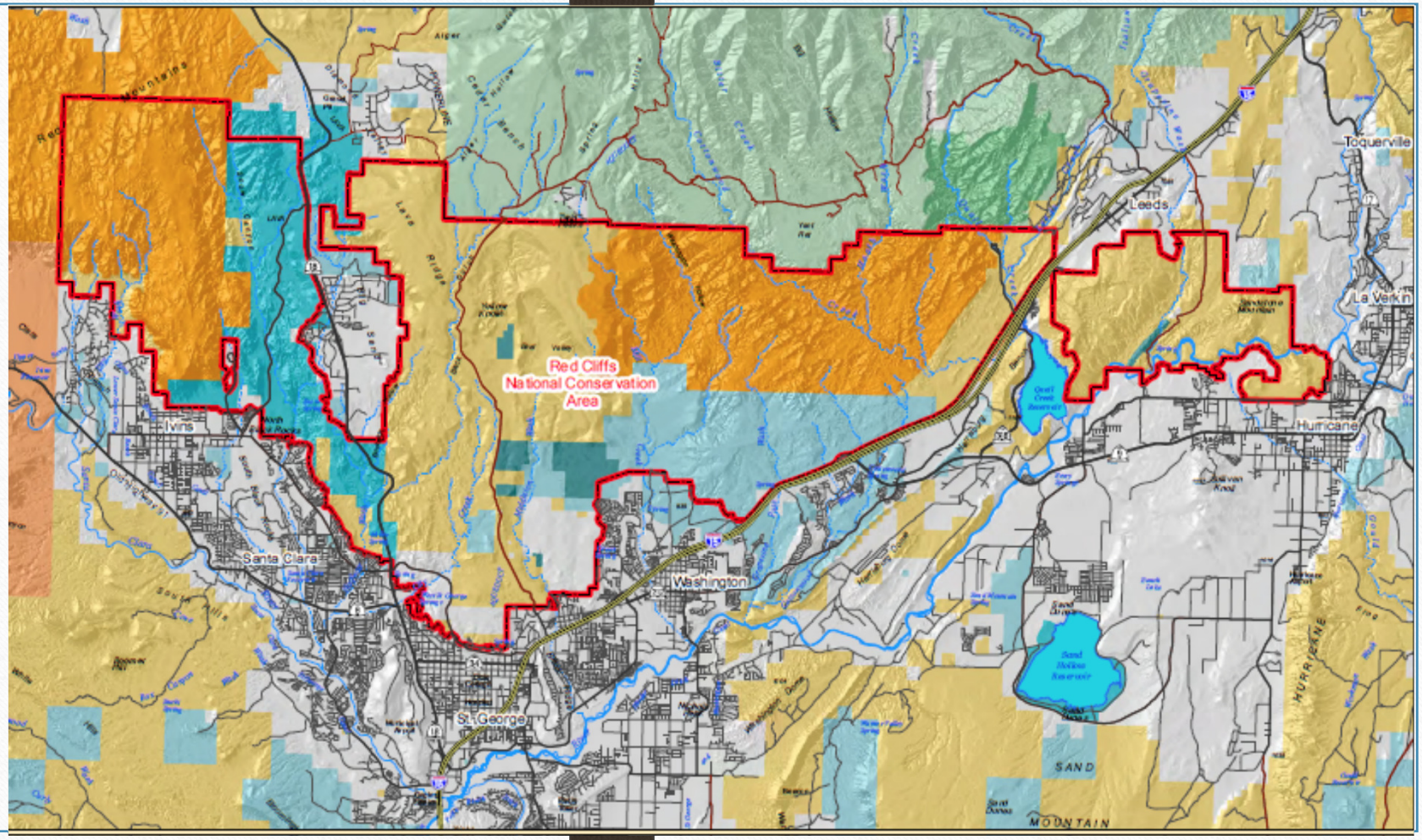
Water Rights



Management Actions	
BLM will coordinate with local and state agencies as water protection plans are developed to ensure that federal land management actions or practices do not jeopardize drinking water quality. Meet the goals of the Colorado River Basin Salinity Control Act by implementing administrative actions in this Plan and continuing to prevent the movement of salts into drainages and waterways that flow into the Virgin River or its tributaries.	Pursue acquisition of non-federal lands from willing sellers within the NCA that would benefit the conservation and protection of surface and groundwater resources. Pursue acquisition of surface and groundwater rights from willing sellers to benefit the conservation and protection of wildlife and improve aquatic habitats and riparian resources. Do not authorize land uses that would export water from the NCA. Work through the State of Utah's water rights system to ensure that BLM obtains water rights on all inventoried point water sources (springs, seeps, wells, reservoirs, etc.) for authorized beneficial uses of water within the NCA, including wildlife, recreation, domestic use within visitor facilities, and the improvement of aquatic habitats and riparian resources.

RMP page 56 and 179

The Red Cliffs NCA borders much of the most densely populated area in Washington County. Keeping all water on the NCA would affect municipal water supplies and growth.

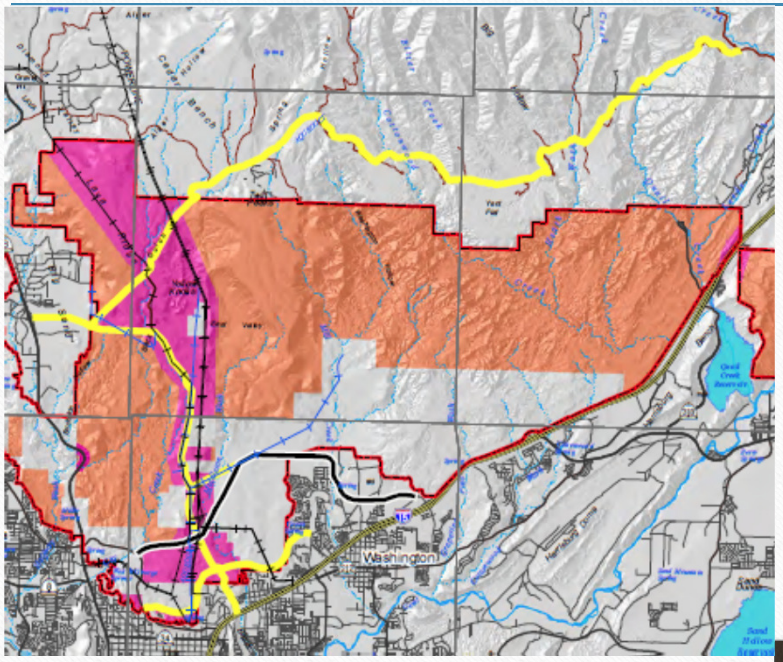


Collaboration and cooperation with local governments language is removed from alternatives B-D

Table 2-2 Water Resources			
Alternative A (No Action)	Alternative B	Alternative C	Alternative D
Goal			
	Water resources are conserved and protected to fulfill the purposes of the NCA and sustain ecosystem resiliency under changing climatic conditions.		
Objectives			
BLM's objectives for soil and water resources will be to work with municipalities, state and local agencies, and other interested parties to: a) Protect community watersheds and sources of culinary water; b) Reduce erosion, stream sedimentation, and salinization;	Surface water quality is suitable for appropriate beneficial uses, complies with approved federal and state standards, and meets or exceeds the applicable Utah Standards and Guides (Appendix D). Salinity and sediment loads in the Beaver Dam Wash do not increase as a result of land uses and authorized activities on public lands in the NCA. Research is supported that increases the understanding of ecosystem processes, cycles, and anthropogenic factors that affect water resources (e.g., fire cycles, vegetation succession) and that may influence climate change.		

RMP page 57

Northern Corridor Route



Black line – county preferred route

Yellow lines – other routes studied by the county

Pink area – BLM proposed corridor

RMP page 283

Areas of Critical Environmental Concern

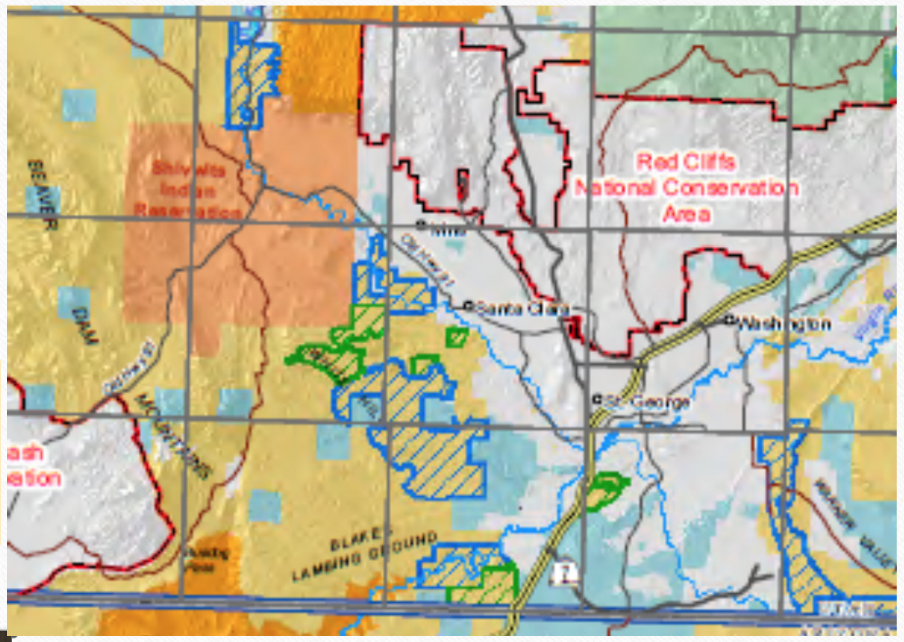
3 New ACECs proposed in Alternative B



ACECs are intended to protect sensitive species like the Geirish mallow. They would impose restrictions on current mountain biking, OHV, and hiking areas.



RMP page 296

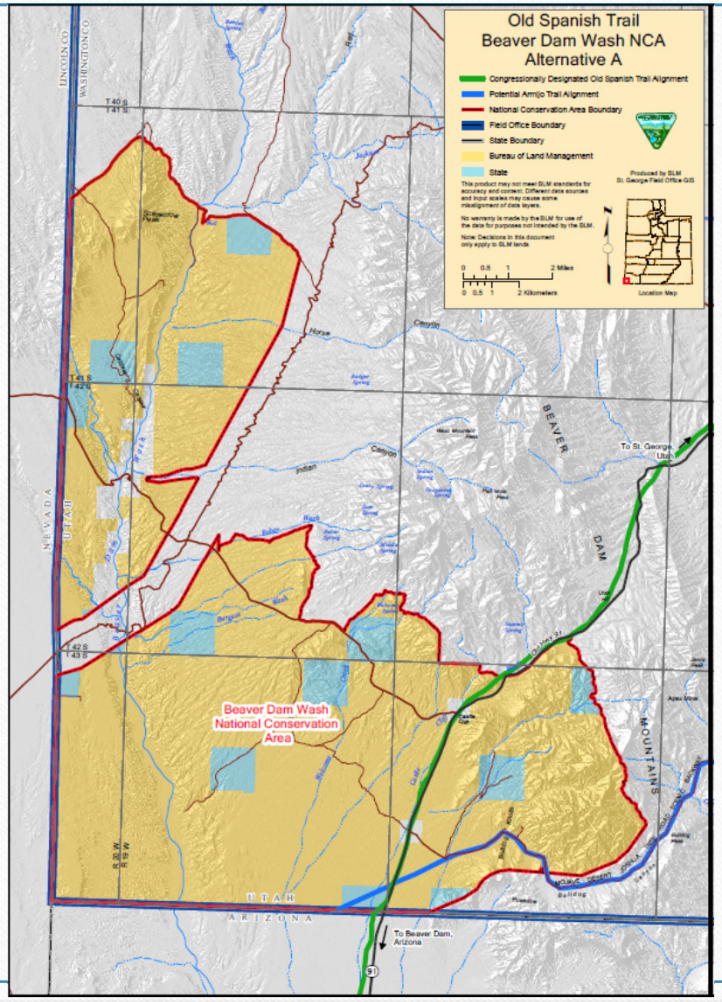


Old Spanish Trail Corridor

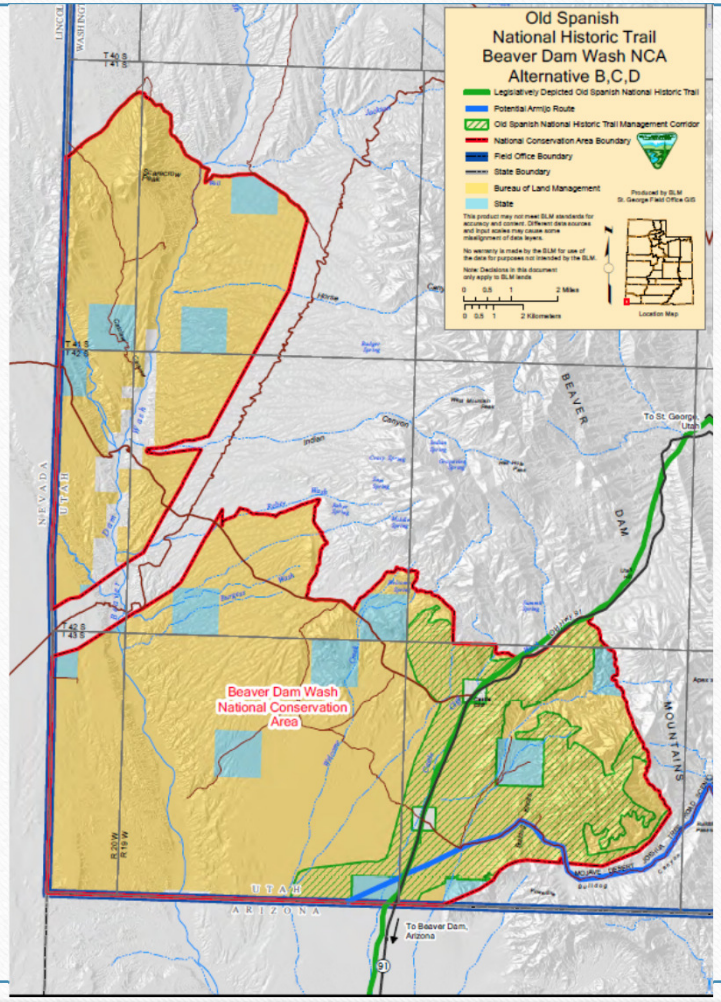
Table 2-25 National Historic Trails (Old Spanish National Historic Trail)

Table 2-25 National Historic Trails (Old Spanish National Historic Trail)			
Alternative A (No Action)	Alternative B	Alternative C	Alternative D
Goal			
	Fulfill the conservation and public purposes for which Congress designated the Old Spanish Trail (OST) to the National Trails System through Public Law 107-325 in 2002.		
Objectives			
No similar action.	Establish an OST National Historic Trail Management Corridor that provides diverse opportunities for the public to connect with and experience trail history and resources. Manage the OST National Historic Trail Management Corridor to identify, conserve, and protect the historic trail and historic remnants and artifacts for their historic, scientific, educational, interpretative, and recreational values. Manage the OST National Historic Trail Management Corridor to conserve and protect the associated visual setting and natural landscape elements that are evocative of the period of trail significance and contribute to resource protection. Manage the OST National Historic Trail Management Corridor to restore altered natural landscape elements of the associated setting to trail-era condition. Enhance opportunities for shared OST stewardship through partnerships with the Old Spanish Trail Association, American Indian Tribes, state, county, and municipal governments, private landowners, and other groups and organizations.		

RMP page 121



RMP pages
122 & 123



Wilderness Characteristics

OPLMA Language

(c) RELEASE OF WILDERNESS STUDY AREAS.—

(1) FINDING.—Congress finds that, for the purposes of section 603 of the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1782), the public land in the County administered by the Bureau of Land Management has been adequately studied for wilderness designation.

(2) RELEASE.—Any public land described in paragraph (1) that is not designated as wilderness by subsection (a)(1)—

(A) is no longer subject to section 603(c) of the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1782(c)); and

(B) shall be managed in accordance with applicable law and the land management plans adopted under section 202 of that Act (43 U.S.C. 1712).

Wilderness Characteristics

Draft RMP Language

Table 2-64 Lands with Wilderness Characteristics

Table 2-64 Lands with Wilderness Characteristics			
Alternative A (No Action)	Alternative B	Alternative C	Alternative D
Goal			
	Lands with wilderness characteristics in the NCA are managed to conserve, protect, and restore those values.		
Objectives			
No similar action.	Inventory all lands with wilderness characteristics in the NCA. Avoid potential project-related impacts through land use authorizations and project design. Naturalness is conserved and protected through appropriate management actions. Naturalness is restored in damaged areas through management actions to re-establish native vegetation communities.		

RMP page 255

Eliminated Recreational Uses



- Collection of fossils and petrified wood
- Competitive equestrian and motorized events
- Metal detecting and geocaching
- Take off and landing of remote controlled aircraft or powered parachutes
- * Dispersed camping and OHV use are further restricted
    - See Table 2-65

Activities Unnecessarily Restricted

Eliminating Options When Management Could Address Concerns



- Closing of grazing allotments rather than management for optimum range health
- No new ROWs (rights of way) rather than management through permitting
- Only allowing native seed planting, even after fires, rather than project specific seeding decisions
- Eliminating wildland fire rather than allowing for management decisions as necessary

Other Possible Sources of Concern

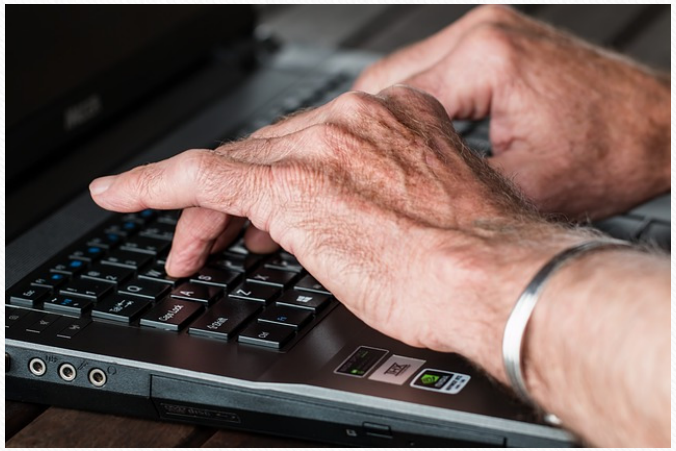
- No discharge of firearms in tortoise habitat except during licensed hunting
- Paleontological or heritage sites "projected to occur" in the NCAs will be allocated to one of the following uses: (how are projections made?)

Table 2-4 Use Allocation Categories		
Use Allocation Categories	Management Action	Desired Management Outcome
Scientific Use	Permit appropriate research	Resource preserved until research potential or data recovery potential realized
Conservation for Future Use	Protective measures; special administrative designations	Resource preserved until conditions for use are met
Public Use	Determine appropriate public uses	Resource preserved long term, with on-site interpretation
Traditional Use	Determine limitations on uses, in consultation with culturally affiliated American Indian Tribes	Resource preserved long term

Effective Comments to the BLM

http://www.blm.gov/ut/st/en/fo/st__george/planning2/nca_resource_management.html

Effective comments refer to specific details of the draft NCA RMPs or draft amendment. They address substantive issues, such as the accuracy of BLM's information sources; or provide new information; or suggest reasonable alternative courses of action.



All comments will be considered during BLM's decision-making process, but *only substantive comments will be addressed in the Proposed NCA RMPs and Proposed RMP Amendment/Final EIS*. We need comments that not only state a preference for certain management actions, but also include the reason for that preference. Tell us what you think of specific aspects of the alternatives—and why.

How to Comment

For Commenting instructions go to: www.blm.gov/sgfo

Comments can be submitted in using the following methods:

- E-mail: utsgrmp@blm.gov
- Mail: Bureau of Land Management, Attention: St. George RMP Planning Team, 345 East Riverside Drive, St. George, Utah 84790.
- Fax: (435) 688-3252, Attention: St. George RMP Planning Team.
- Open House: Attend an open house in September and submit your comments in person.



The comment period ends on **October 15, 2015.**