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February 28, 2005

RJ Hughes
Bureau of Land Management
345 E. Riverside Dr.
St. George UT 84790

Subject:

Environmental assessment for proposed Tri-State ATV Jamboree
Event (EA)

Dear Mr. Hughes:

These comments are responsive to the above environmental
assessment (EA).

The Utah Native Plant Society is a 501(c)(3) non-profit organization
established in 1978 to promote the conservation, appreciation and
appropriate use of plants native to Utah and the Intermountain West.
The society has members and chapters throughout the state of Utah
including Washington County and Kane County.

We incorporate by reference herein our comments dated February 23, 2005 made with respect to the proposed environmental assessment for the Rhino Rally Motorcycle Event. All of the same concerns and issues raised in response to that EA equally apply to this EA, some of which we will reiterate here.

The entire region should undergo a thorough, updated biological soil crust analysis so that these impacts can be dealt with on a comprehensive rather than piecemeal basis. Similarly, a comprehensive off-road vehicle management plan with education and law enforcement components needs to be implemented.

The EA evidences the need for comprehensive planning. Page 5 of the EA alludes to the fact that the event may help to define recreational activities in the region and the development of suitable management techniques with landowners and land managing agencies. Yet, this EA has been developed in isolation and separate from other proposed activities, including the recent Rhino Rally Motorcycle Event EA. Page 36 similarly indicates that other groups may also decide to start their own events in the Sand Mountains area depending on the popularity of this and other events. Management cannot properly respond to each and every event request without a comprehensive plan that establishes limits in terms of time of year, maximum allowable impact quantified in a number of different ways, etc. Granting a permit for a ten year period under these circumstances seems questionable.

Pre-ride education should include a significant section devoted to biological crusts and fragile ecosystems which host rare and endemic plants and the critical need to stay on existing trails both in connection with this event but in connection with all ATV or OHV activities. This education should provide information relating to the time it takes for the land to recover from vehicle impacts that likely extends well past the life span of the casual user who causes the damage. See Webb, 1983.

Pre-ride education should also explain to ATV/OHV users that trail restrictions include not riding vehicles on open dunes. For example, ATV users should know that except in specifically identified and marked areas, no riding should occur on the Coral Pink Sand Dunes.

The fact that a given area has been extensively used for recreation and livestock grazing as stated a number of times in the EA does not per se indicate that such use should continue at recent historic levels

nor should it be used as the basis that such recreation and livestock grazing continue unabated.

The sheer number of ACECs identified by the EA is indicative of the region's uniqueness as well as the potential for negative impacts that ATV events in these areas involving many participants, onlookers and vehicles of all kinds may cause.

Once again it appears that this EA ignores plant species other than those that are federally listed. Special status species are referred to in the context of the Beaver Dam Slope ACEC, but nowhere else. Why? Suppose that a currently federally listed species such as *Pediocactus sileri* was delisted. Would this mean that it ultimately would no longer be considered in any planning on federal lands despite its rarity and even it may still be considered by the Utah BLM as a sensitive species? If Utah BLM sensitive or BLM Arizona Strip special status plant species are not considered in environmental impact statements, inevitably that may lead to the need for those species to be listed (representing a potentially significant cost to taxpayers). The need for listing can be avoided by properly considering and avoiding impacts to rare plant species in any and all impact analyses. The area is rich in species diversity with many rare and endemic plant species. *Townsendia smithii* occurs near the Seegmiller/Black Rock Canyon proposed routes. *Petalonyx parryi* occurs within many of the proposed routes and we witnessed some of its habitat being destroyed for residential development in May of 2004 south of the town of Washington. These are only examples. The yet to be established Castle Cliff route likely intersects the habitat of a number of rare plant species and requires close scrutiny.

The EA indicates that *Pediocactus sileri* does not occur in the Hurricane Cliffs area yet we provided you an example where it does occur in that area in our response to the Rhino Rally EA proposal.

Recreation use in ALL of the proposed route areas includes wildflower walks and native (including rare) plant field trips. Education can also be recreation and these areas represent an outdoor classroom for school children and students of all ages. This is an underemphasized use of the areas involved. These uses are not consistent with heavy mechanical uses that produce dust (which clouds the air and reduces visibility for sightseers, and as an aside may also even interfere with pollination), air pollution which has clearly negative human health impacts, soil and water contamination (see below) and significant amounts of noise which creates stress not only for birds and other

creatures but also for people. So, even if no new trails are created and ATV riders in fact stay on those trails, this does not mitigate other real impacts created by the growing number of events in the county such as this one.

ORVs driven near streams create a serious water pollution threat (Havlick, 2002). ATVs cause tens of millions of gallons of gasoline and motor oil to be dumped into soils and waterways on public lands each year due to inefficient combustion and emissions (Havlick, 2002). Noise caused by ORVs negatively impact the senses of certain small mammals and reptiles (Taylor, 2002?). Scientific research and literature overwhelmingly documents the negative impact of ORVs on the environment (Taylor, 2002?).

An unidentified recreation use in the area is the frequent use of open spaces as firearms target practice which is a threat both to all pedestrian travelers (which many of us can attest to from having dodged bullets in these areas including the Red Bluffs ACEC and on Warner Ridge and the large number of scattered bullet shells) and to ATV/OHV/mountain bike users and onlookers. That "recreation" use is inconsistent with all other types and represents a serious unaddressed problem. Since the BLM lacks adequate law enforcement to patrol these areas under even normal circumstances, will the permittee be required to hire enforcement staff to help ensure the safety of participants and avoid conflicts with other authorized and unauthorized recreational uses when the event is held and especially in light of the wide area over which the events will occur?

An unidentified impact is that with the increased publicity associated with events like the Rhino Rally Motorcycle Event and this jamboree held over an incredibly wide and diverse area, this may lead to increased OHV use by non-educated OHV users who will not observe the rules of responsible ATV use. So an outreach effort must be made to those individuals/families who do not belong to ATV/OHV groups but who are currently causing significant damage to public and other lands in the area outlined by this EA.

No ATV use associated with this or other events should be allowed through the Red Bluffs ACEC. If participants have any chance of even coming close to running over the dwarf bearclaw poppy (*Arctomecon humilis*), an impact indicated on page 30 of the EA as one that should be avoided, then the trail routes have not been properly planned. Mountain bike/ATV/motorcycle use in the Red Bluffs ACEC is already out of control and users are not staying on trails as it is. To ensure

the long term survival of several of the rare plant species in the mapped areas contained in the appendix of the EA including *A. humilis*, undisturbed or recovering soils with high gypsum content require every possible means of protection.

It would appear that some of the proposed trails might conflict with areas impacted by the proposed Southern Corridor in terms of potentially both trail access as well as direct conflict with trail systems. This EA demonstrates how the Southern Corridor and the yet to be formally proposed Western Corridor will decrease recreation opportunities in the area for everyone and how total cumulative impacts are not being taken in account in connection with the multitude of disturbances that are either now occurring or which are being planned for the area as a whole. Without a master plan that in general controls growth in the area, there will be fewer and fewer places for wildflower lovers and ATV enthusiasts alike and many species will become extinct in the process.

We note that the notice of assessment letter was dated February 3, 2005 with comments due by March 5, 2005 (a Saturday). The EA indicates that the next event is to be proposed to be held March 10-12, 2005. We do not understand how there could possibly be enough time prior to the next event to receive and evaluate comments, allow for due process, prepare appropriate pre-ride education materials and complete remaining trail assessments prior to the next event.

Finally, it is improper to indicate that the "no action" alternative would not provide ATV user education about threatened and endangered plants. This is the kind of *non-sequitur* that has been often used in other EIS/EA documents to attempt to indicate a positive benefit for a living thing in conjunction with projects which by their very nature instead represent disturbances to living things; it is a misleading way to try to make the public feel better about something that otherwise has negative impacts. The BLM and other organizations could, if they chose to do so, provide ATV users with appropriate education in many different forums and in the context of many other events or activities which could be at the very least equally as effective as this annual jamboree. There is no reason to wait for someone to propose a jamboree (or anything else for that matter) to educate the public and this cannot be seriously stated as a disadvantage to a "no action" alternative. Following the logic in the proposed EA, there should be an OHV or ATV event every week (or better yet, every day) since that would allow even more ATV users to potentially receive education about threatened and endangered plants. This is of course nonsense.

The sentence in paragraph 4.2.2.4 relating to potential user education under the no action alternative should be stricken. (The same would apply to statements made concerning wilderness, threatened and endangered animals, ACECs, cultural resources and so forth.)

Thank you for consideration of these comments.

Sincerely,

Utah Native Plant Society

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References:

Havlick, David G. 2002. *No Place Distant: Roads and Motorized Recreation on America's Public Lands*. Island Press. Washington D.C. 297 pp.

Taylor, Richard B. 2002? *The Effects of Off-Road Vehicles on Ecosystems*. Texas Parks and Wildlife. 12 pp.

Webb, R. H., H. G. Wilshire, and M. A. Henry. 1983. Natural recovery of soils and vegetation following human disturbance. Pages 279-302 in R. H. Webb and H. G. Wilshire, editors. *Environmental effects of off-road vehicles: impacts and management in arid regions*. Springer-Verlag, New York

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