

# 2010 Report Card

## Assessing Utah BLM's Management of Off-Road Vehicles



Off-road vehicle (ORV) damage to public lands has long been the bane of visitors to southern Utah and is an increasing challenge to the Bureau of Land Management (BLM), the federal agency in charge of ensuring that ORVs do not harm natural resources. This report card provides a snapshot of BLM's ORV management on Utah's public lands and shows that in too many categories BLM continues to come up short, resulting in water degradation, soil erosion, archaeological site damage, and visitor conflicts.

With over 200,000 registered ORVs in Utah (and a similar number of unregistered vehicles) and thousands more coming to Utah's fragile desert lands from bordering states, management is a challenge. Part of the problem lies in the fact that BLM has only recently attempted to designate trails and keep off-roaders on them; putting the genie back in the bottle is difficult.

Thankfully, BLM has transitioned from a free-for-all approach on the 23 million acres of public land the agency manages in Utah, to limiting ORV use to designated trails, but it has not done enough homework to support its trail designations. BLM has not, for example, ensured that impacts to other resources like water, wildlife, and quiet recreation are "minimized" as the law requires. Nor did BLM check to make sure that the ORV trails it designated do not disturb archaeological sites or facilitate looting.

Instead, in 2008, when the BLM developed its first large-scale trail maps, it designated a whopping 20,000 miles of ORV routes in southern and eastern Utah alone—enough to reach from LA to New York more than seven times. Worse, the newly-designated routes are in some of the most ecologically sensitive areas: in streambeds and riparian areas, in wildlife habitat, and in areas rich with cultural resources. And with these recent trail designations, BLM authorized approximately 3,000 miles of routes in undeveloped wilderness-quality landscapes.

There is widespread public support by Utahns for BLM to do a better job. In a 2005 poll by Dan Jones and Associates, **78% said that ORV use needs to be more closely managed on Utah's public lands**, and only 27% thought that the rules for using ORVs were adequately enforced. Sixty percent (60%) believe that ORVs conflict with other users such as hikers, hunters, birders, mountain bikers and those on horseback. **Sixty-seven percent (67%) said that southern Utah's wilderness areas are put at risk by ORVs.**

Importantly, although BLM's own visitor survey (*National Visitor Use Monitoring Results for Moab Field Office*) indicates that only 10% of visitors use ORVs on public lands, the agency's 2008 ORV plans make 85% of the lands in eastern and southern Utah available for ORV use via "open" and "designated route" areas. These plans are out of balance.



## GRADES

The Southern Utah Wilderness Alliance assessed BLM's performance across a spectrum of ORV management categories:

### Shows Progress

**Grade B:** BLM's 2008 ORV plans are an improvement over the unlimited cross-country use that existed prior to the plans. By limiting ORV use to designated routes and closing a few ORV play areas, such as the Butler Wash area near Cedar Mesa, the agency took a step in the right direction. BLM also showed progress by retaining ORV closures—implemented to protect natural and cultural resources—for Factory Butte and Recapture Canyon.

### Protects the Environment from ORV Damage

**Grade D:** Scarce desert streams support 75-80% of all wildlife, yet BLM ignored scientific studies documenting the importance of Utah's streams and designated ORV routes in nearly all the streams in southern Utah, putting these rare and valuable resources—accounting for less than 1% of Utah's public lands—at unnecessary risk. Further, most scientists agree that protecting large, undeveloped areas is the best strategy to promote adaptation in the face of climate change; however, BLM designated over 3,000 miles of ORV routes across large tracts of undeveloped wilderness-quality land.

### Understands and Appreciates History and Other Cultures

**Grade F:** Ignoring the sad and deplorable history of looting and vandalism of cultural resources in southern Utah, BLM failed to survey potential ORV routes for cultural resources before designating the routes, even though scientific research confirms that vandalism and looting of artifacts are more likely to occur at archaeological sites visible from routes. As a result of BLM's indifference to these irreplaceable resources, ORV routes were designated directly through cultural resource sites eligible for the National Register of Historic Places.

### Understands and Applies Scientific Findings

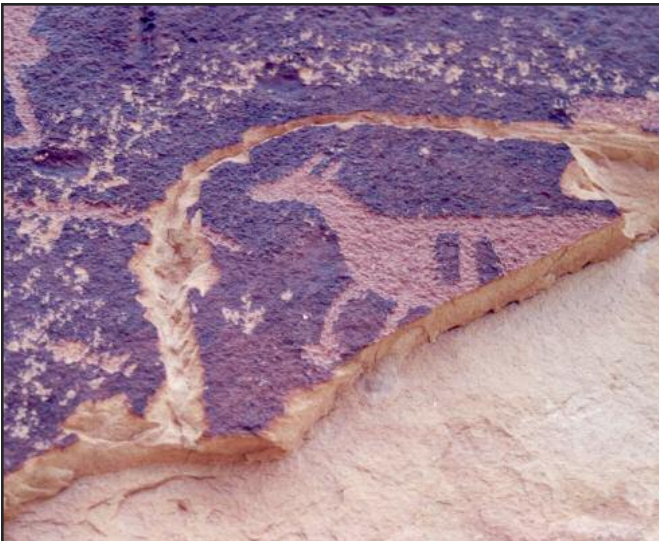
**Grade D:** Climate change is already affecting the Colorado Plateau and the U.S. Geological Survey has concluded that ORVs make the problem worse by degrading water supplies, spreading flammable weeds, eroding soil, and contributing to dust storms that blanket the southern Rockies with snow. BLM failed to consider climate change when designating 20,000 miles of ORV routes in the 2008 plans.

### Follows Directions

**Grade F:** When BLM issued its 2008 ORV plans, it ignored the federal mandate to “protect” the “scientific, scenic, histor-



*One of dozens of stream crossings on the designated trail in Tenmile Canyon.*



*Vandalism of ancient rock art.*



*Dust and soil erosion caused by ORV use near Factory Butte.*

ical, ecological, environmental, air, water and archeological” values of our public lands, as well as the federal directive that ORV routes must minimize conflicts with other visitors and minimize impacts to streams and watersheds, wildlife, scenery, and wilderness attributes. Instead, the agency blanketed Utah’s canyon country with a dense network of routes—20,000 miles total—regardless of the conflicts with other visitors and the impacts to natural resources.

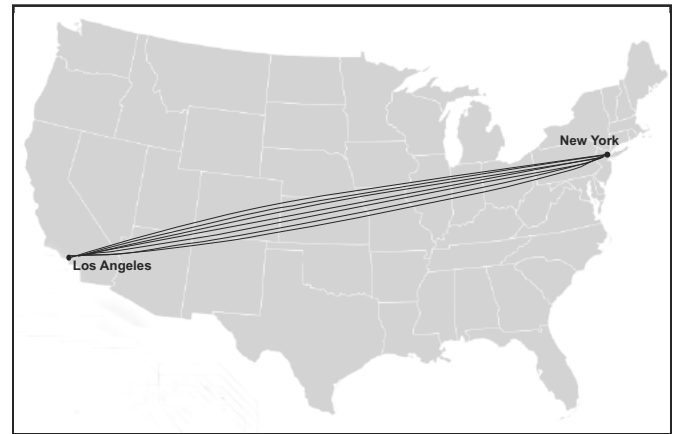
### Does Quality Homework

**Grade I:** BLM merely copied and largely incorporated the “wish lists” of counties and ORV enthusiasts into its 2008 ORV plans, without doing its own homework to determine if particular ORV routes were appropriate and necessary. The resulting ORV plans are seriously flawed due to BLM’s failure to weed out routes that impact natural resources, ghost routes, and unnecessary routes—all of which will have significant long-term effects on southern Utah’s scenic redrock landscape. BLM must complete its homework, analyze ORV impacts to natural resources, and fix its ORV plans.

### Recognizes and Corrects Mistakes

**Grade F:** Although BLM acknowledged that the “drive anywhere” approach was wrong, the trail system designated by the agency in late 2008 merely enshrined the haphazard trail network the ORV users had pioneered over the years in streambeds and along livestock, wildlife, and old mining trails, without proper environmental reviews. In the end, we had to give BLM a failing grade for not fixing the seriously-flawed ORV trail systems to protect streams, fish and wildlife habitat, wildlands, and significant cultural resources, and to mitigate user conflict and the effects of climate change.

**BLM’s 20,000 miles of designated routes in Utah would stretch from Los Angeles to New York City seven times**



*BLM designated this ORV "ghost route" in its 2008 ORV plan.*

### **Our grading system is based on BLM’s adherence to federal rules and regulations regarding management of ORV use on federal public lands.**

**A** – Exceeds the statutory and regulatory requirements governing off-road vehicle use on public lands, achieving excellence in protecting the full range of natural and cultural resources for which BLM is responsible.

**B** – Meets statutory and regulatory requirements, but falls short of excellence in management or protection.

**C** – Average performance in managing ORV use, resulting in long-term damage to the health of the natural resources in some areas, and displacement of other recreationists and visitors to public lands due to ORV use.

**D** – Poor performance, resulting in widespread damage to resources due to ORV use, including riparian area damage, degraded water quality and wildlife habitat, damaged vegetation, and adverse impacts on wildlife. Improvement of performance should be a priority goal for BLM.

**F** – Fails to provide for the minimum protection required for ORV management, and fails to conduct the analysis required by law as a prerequisite to allowing ORV use on public lands.

**I** – Work not completed by date due. Work must be completed by end of 2010 or a failing grade will be assigned.



BLM's ORV route designations must comply with the Federal Land Policy and Management Act (FLPMA) and the standards set forth in FLPMA's associated Federal Regulations at 43 C.F.R. 8342.1, which state:

(a) Areas and trails shall be located to minimize damage to soil, watershed, vegetation, air, or other resources of the public lands, and to prevent impairment of wilderness suitability.

(b) Areas and trails shall be located to minimize harassment of wildlife or significant disruption of wildlife habitats. Special attention will be given to protect endangered or threatened species and their habitats

(c) Areas and trails shall be located to minimize conflicts between off-road vehicle use and other existing or proposed recreational uses of the same or neighboring public lands, and to ensure the compatibility of such uses with existing conditions in populated areas, taking into account noise and other factors.

(d) Areas and trails shall not be located in officially designated wilderness areas or primitive areas. Areas and trails shall be located in natural areas only if the authorized officer determines that off-road vehicle use in such locations will not adversely affect their natural, esthetic, scenic, or other values for which such areas are established. [emphasis added]

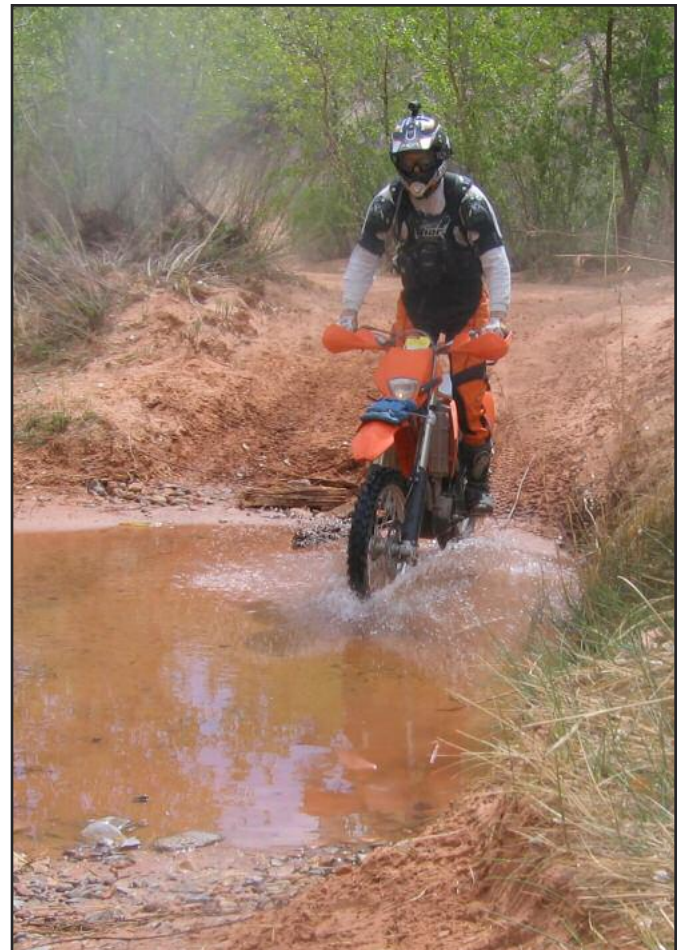


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## RECOMMENDATIONS

- BLM must fix its destructive 2008 ORV plans and designate only those routes that minimize impacts to natural resources and minimize conflicts with other users, based on solid scientific analysis.
- Before allowing further damage to natural and cultural resources, BLM must immediately remove routes in streambeds and undeveloped wild lands as recommended by scientists and climate change experts, and in areas with significant cultural resources.
- The 2008 ORV plans are wildly out of balance, with 20,000 miles of ORV routes crisscrossing Utah's public lands, making it difficult to escape the sight and sounds of ORVs. BLM must acknowledge and document the conflicts between ORV use and non-motorized uses of public lands, and it must manage more areas free of ORVs.
- BLM should designate trails only where there is a realistic possibility of agency enforcement, not in the backcountry where the chances of a BLM ranger encountering a scofflaw is famously small.



*Dirt bikes and other off-road vehicles pollute the stream in Arch Canyon and erode its banks.*