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June 18, 2024

Bureau of Land Management
Moab Field Office
82 East Dogwood
Moab, UT 84532

To be submitted electronically via BLM Eplanning website: <https://eplanning.blm.gov/eplanning-ui/project/2032758/510>

RE: DOI-BLM-UT-Y010-2024-0029-EA- Dolores Travel Management Plan

Dear Travel Management Planning Team:

Thank you for the opportunity to provide scoping comments on the Dolores Travel Management Plan (“TMP”). Mesa County values the collaborative relationship with the Bureau of Land Management (“BLM”), as outlined in Memorandum of Understanding CO-076-97-001. As Mesa County is 73% public lands, and largely surrounded by public lands, decisions regarding federal lands management has the potential to significantly impact the economic and socioeconomic wellbeing of our residents and communities.

While we understand that this plan does not currently include any roads or trails in Colorado, we are concerned that the closure of roads and/or trails in this TMP could impact access to areas within Mesa County. Nearly all of the roads identified in the TMP connect to those in Mesa County. Some, like Route D0002, provide the only access to specific areas of Mesa County’s backcountry, and closing this route would significantly diminish the user experience.

These roads and trails provide access to popular outdoor activities such as four-wheeling, hunting, mountain biking, hiking, and camping, all significant economic drivers for local businesses and governments and cherished pastimes for many residents and visitors of Mesa County. Additionally, the area is identified by the United States Geological Survey (“USGS”) for potential uranium, vanadium, lithium, magnesium, and potash deposits.¹ We believe closing access to these critical resources would be shortsighted. We do not support the closure of any roads or trails and continue to believe that access to federal lands benefits all public land users.

Per Mesa County’s Resource Management Plan, we support the following applicable Resource Management Objective and Policy Statements:

Resource Management Objective

A. Maintain and expand access, where possible, sustainable, and appropriate to federally managed lands in Mesa County for multiple use and purposes such as safety, health, welfare, commercial, and recreational opportunities.

Policy Statements

1. Support designation of all currently open trails, rights-of-ways, and roads as per adopted in the most recent Travel Management Plan as open. No road, trail, or RS 2477 right-of-way should be

¹ U.S. Geological Survey. (2024). Focus areas for data acquisition for potential domestic resources of 13 critical minerals. Retrieved April 4, 2024, from <https://www.usgs.gov/publications/focus-areas-data-acquisition-potential-domestic-resources-13-critical-minerals>

closed unless public safety or health demands its closing and the appropriate analysis and disclosure, in consultation with the County, is completed prior to closure. A road on federally managed lands should [not] be closed without a full NEPA analysis.²

2. Request that any planning process or activity that restricts or eliminates access to federally managed lands to notify and allow the County to initiate coordination and cooperation to resolve any potential conflicts with the County's objectives, principles, and policies, early in the process prior to taking action.

3. Designate historic stock trails as valid access routes for the purpose of trailing livestock between grazing areas in coordination with grazing permittees, the County and appropriate federal agency.

4. Roads on federally managed lands should remain open to provide for the economic benefit, use, and safety of the public. Where road closures are proposed, specific justification for the proposal should be given on a case-by-case basis, and the proposal should be discussed in coordination with Mesa County.

5. The network of roads within the boundaries of the County are necessary and essential for the health, safety, welfare, and commercial opportunities of all people within the County (BOCC 2014-75).

6. The free use of public roads and rights-of-way, which are essentially tied to the access of these resources, and for other uses set forth above, should not be encumbered or impeded by obstructions which create an unauthorized and potentially dangerous impediment to the free use of our roadways, routes of travel, and rights-of-way and pose a clear threat to the health, safety, welfare, and economic well-being of our citizens (BOCC 2014-75).

7. The County reserves its right and responsibility to manage the public ownership of highway rights-of-way accepted pursuant to the grant offered under R.S. 2477 and under the Colorado revised Statutes (BOCC 2014-75).

8. The County supports the use of OHVs for recreational use on public roads as adopted in travel management plans through cooperation with the County. (Ordinance 12)

For any proposed alternative, we urge the BLM to collaborate closely with local user groups to ensure that access to important areas is maintained. Additionally, we request a comprehensive economic analysis for each alternative to identify potential risks and opportunities for Mesa County and its residents.

Please keep us informed as this process continues so that we can participate fully. Thank you for considering our comments.

Sincerely,

Bobbie Daniel, Chair
Mesa County Board of Commissioners

Cody Davis
Commissioner

Janet Rowland
Commissioner

CC: Peter Baier, Mesa County Administrator
Todd Starr, Mesa County Attorney
Mesa County Administration

² The Mesa County Resource Management Plan, as adopted, contains a scrivener's error in the last sentence of Policy Statement one: "A road on federally managed lands should [not] be closed without a full NEPA analysis." The word 'not' has been included in brackets to rectify this error and to clarify Mesa County's position, emphasizing that route closures necessitate a comprehensive NEPA analysis before implementation.