



INTERNATIONAL MOUNTAIN BICYCLING ASSOCIATION



## Public Comment Guide: Shurtz Canyon Hazardous Fuel Reduction Plan

Cedar City, Utah September 2024

The Bureau of Land Management Cedar City Field Office has opened a comment period as the second phase of public involvement in shaping the [Shurtz Canyon Hazardous Fuels Reduction Project](#). The comment period is open until September 11, 2024.

Action is needed to uplift the voices of the outdoor recreation community to support the BLM, to employ trail maintenance best practices to protect the \$1.5 million dollar trails infrastructure identified in the Shurtz Canyon Hazardous Fuels Reduction Project area, and to leverage trail corridor technique that support fire mitigation and ensure healthy, sustainable landscapes for years to come.

For more detailed information, visit IMBA's [News Release](#) "Speak Up for Trails and Fire Resilient Landscapes in Cedar City, Utah", dated September 3, 2024.

## Comment Submission Options

Comments will be accepted until Wednesday, September 11, 2024, and will be accepted via mail or the BLM National NEPA Register.

Submit comments via the web portal: BLM National NEPA Register: Shurtz Canyon Hazardous Fuels Reduction Project ([DOI-BLM-UT-C010-2024-0001-EA](https://www.blm.gov/NEPA/Record-DOIs/2024-0001-EA)).

Select “Participate Now” on the left side of the screen.

Submit comments via mail to:  
Attn: Shurtz Canyon HFRP  
Color County and Paria River Fuels  
Color County BLM District Office  
176 E DL Sargent Drive  
Cedar City, UT 84721



## Substantive Comment Requirement

In order to receive consideration, comments must be substantive. This also shows respect for our BLM partners’ time and expertise. In this instance, substantive is defined as comments that do one or more of the following:

- Question, with reasonable and documented basis, the accuracy of information in the Shurtz Canyon Hazardous Fuels Reduction Project.
- Question, with reasonable and documented basis, the adequacy of, methodology for, or assumptions used for the Shurtz Canyon Hazardous Fuels Reduction Project.
- Present new information relevant to the Shurtz Canyon Hazardous Fuels Reduction Project.
- Present reasonable alternatives other than those analyzed in the Shurtz Canyon Hazardous Fuels Reduction Project.
- Cause change or revisions in one or more of the alternatives.

# Support for Writing Your Substantive Comment

As you craft your substantive, personal comment, please consider including the following from the perspective of professional trail stewards, outdoor recreation enthusiasts, and the mountain biking community.

## General Comments:

### Protect the Asset: An Incredible, \$1.5 Million Dollar Trail System

- Best practice trail building and maintenance techniques that leverage landscape conservation can help protect the trails infrastructure while allowing effective hazardous fuels reduction treatment and maintaining viewsheds and user experiences. Please consider in greater detail how existing, fresh, and scheduled-to-be-built trails can be protected from soil erosion and destruction in this plan.

### Uplift the Economic Impact of Outdoor Recreation and Trails

- Outdoor recreation is a \$646 Billion dollar industry in the U.S. with over 140 million Americans engaged. The economic impact of outdoor recreation was largely under researched and understated in this Hazardous Fuels Reduction Project. With visitors drawn in greater numbers each year to this area, the contribution to local economies by the outdoor recreation infrastructure should not be stunted just as it begins to expand.

### Trails Contribute to Long-term Landscape Health

- Sustainable trail design, maintenance and stewardship contribute to landscape health by mitigating erosion, uplifting viewsheds, and engaging local communities in stewardship. In no world do outdoor recreationists want trails protected over people, and in this case, it is very possible to improve details of treatments to ensure protection for all of the goals and intended outcomes listed in Section 1.2 on page 2 of the Hazardous Fuels Reduction Project.

### Current Maps

- Maps tell the visual tale of projects and impacted areas, and help stakeholders orient themselves and understand the context of any management plan. Please update the maps in this Hazardous Fuels Reduction Project to reflect the recent changes to outdoor recreation infrastructure in the affected areas. [IMBA](#) has provided a map that reflects the current state of professionally designed, engineered, and built trails in and around Cedar City as of 9/1/2024.

### Engage With Local Partners in Outdoor Recreation and Stewardship

- The people and volunteers of local trails, outdoor recreation, and volunteer organizations contribute millions of dollars each year to outdoor recreation infrastructure with their wallets and with their time. Local trails organizations are essential partnerships in the protection, preservation, and stewardship of trails infrastructure, and have connections and insights that can provide another layer of evidence to inform decisions. Reach out to your local non-profit and outdoor recreation partner! We are in this with you, and are proud to support the BLM and partner for America's public lands.

## Protect Places for Kids to Play

- Since 2012, the Utah High School Cycling League (an affiliate league of the National Interscholastic Cycling Association) has been actively engaging increasing numbers of kids in competitive cycling. It was the largest first-year league in NICA history, and just two years later, grew to become the largest league in all of NICA. From hosting 9 races in between two regions in 2016 to expanding to a record 25 races and 6 regions in 2022, the Utah League engages over 5,000 youth and over 2700 registered coaches on Utah's trails every year. Trail systems like the Iron Hills provide invaluable places for Utah's Youth to get outside and move their bodies.

## Thank You!

- Thank you for the opportunity to impact this plan, for the ongoing partnership, and for the stewardship you provide to America's Public Lands. The trails community sees your work, and appreciates all your time, efforts, and interdisciplinary expertise.

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*"Efforts to thin and help create a natural mosaic of forest vegetation are necessary for sustainable outdoor recreation, and can be achieved through an approach that is responsible, resilient, and considerate of economic drivers of local communities." IMBA's Policy Director, Aaron Clark.*

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# Section-by-Section Substantive Comments

## Section 1.4 Land Use Plan Conformance (p. 2)

- **Comment:** Mountain Bike communities across the country have been outspoken supporters of the BLM's [Blueprint for 21st Century Outdoor Recreation](#) that identifies major shifts in how BLM Land Managers will prioritize and support outdoor recreation, not as an afterthought or in a reactive manner, but proactively and in collaboration with outdoor recreation user groups and non-profit organizations. We have also uplifted the positive potential of the 2024 BLM [Public Lands Rule](#), which will serve to safeguard the health of public lands by placing conservation on equal footing with the other multiple uses of public lands. Neither of these new management practices are mentioned or reflected in the Shurtz Canyon Hazardous Fuels Reduction Project Environmental Analysis, instead relying on the standard 1986 Resource Management Plan which received an update in 2005, 19 years ago. Trails and the people that love them in your community can and should be considered assets in fire mitigation strategies.

## Section 3.7.1 How would the proposed action affect developed recreation and viewsheds? (p.48)

- **Comment:** Map 7: Trails and viewsheds within the Shurtz Canyon Hazardous Fuels Reduction Project project area on p. 49 is not up to date. IMBA has provided a map reflecting current trails (last page).
  - Several trails that are shown as proposed trails are finished, existing trails. These trails include Scenic Byway, Round About, and Side Hustle.
  - Trails that are under construction as of summer and fall 2024 are also not represented adequately on the map. The Breaks Trail, connecting Tombstone to the Pyramid Ridge Trailhead, is currently under construction and scheduled to be completed by mid-October, 2024.
  - Identified focus-areas currently undergoing professional trail planning and design, to be constructed in 2025-2028 are not represented in the current version of Map 7.



### Section 3.10.1 Cumulative Effects- Past, Present, and Reasonably Foreseeable Actions (p.61)

- **Comment:** Section 3.7.1 on page 48 that recreation use within the analysis area is moderately high due to the proximity to municipalities. Later in section 3.10.1, it is acknowledged that recreation is a major land use within the analysis area (p. 63). Data from National Park System research is referenced in a thorough, and well-thought analysis of foreseeable actions. Other sources of data this Environmental Assessment could include to measure past, present and foreseeable future actions are participation data from the Utah High School Cycling League which brings hundreds of youth mountain bikers and their families to Cedar City [twice in 2024](#), and local outdoor recreation organizations and trails nonprofits.

### Section 3.10.3 Cumulative Effects-Proposed Action (p. 68)

- **Comment One:** In the final paragraph of this section, the discussion about cumulative impacts to the Iron Hills Trails System states that removal of vegetation may change the scenic quality and shaded nature of the singletrack trails. It acknowledges that treatments will be visible for 3-5 years before the vegetation begins to cover evidence of mechanical work. Please add to these facts that the treatment and removal of vegetation in the Shurtz Canyon Hazardous Fuels Reduction Project will impact water and wind erosion for years to come, and may result in increased erosion and maintenance requirements in the years following the treatments. Taking strategic and informed actions to protect outdoor recreation infrastructure that consider vegetation and soil types will also contribute to healthier recovery from treatments. Our recommendations for these strategies are listed as comments to Appendix B.
- **Comment Two:** If an area of land is clear cut, land managers will need to wait 3-5 years for the soil to stabilize before building new trails infrastructure. This could significantly delay in-process and planned trail construction.

### Section 4.1 Consultation and Coordination- Persons, Agencies or Groups Consulted (p.68)

- **Comment:** The team listed is mighty and effectively represents and interdisciplinary approach to consultation and coordination. Notably, Mike Innes from the BLM's Cedar City Field Office is the only person or group representing outdoor recreation. Please consider inviting consultation with local trails organizations such as Iron Trailcraft, the Utah High School Cycling League, and other local outdoor recreation organizations. In many cases these groups represent both regular users of impacted areas and volunteer stewardship organizations, committed to supporting and assisting land management agencies in the effective, safe, and healthy management of our public lands. For growing, destination-level trail systems like the Iron Hills, regional and national partners such a the Chamber of Commerce, the Tourism Bureau, and [IMBA](#) should be consulted.

## Appendix B: Design Features- Recreation and Visual Resources (REC) (p. 83-84)

- **Comment One:** Introduced in Section 2.2 Alternative 2- Proposed Action (p. 20), Appendix B contains descriptions of design features included to address potential impacts of the proposed action, and to contribute to the designed outcomes listed on page 14. It plays a large role in ongoing interventions in this area. As such, we submit the following best practice recommendations that will contribute to protecting the \$1.5 Million Dollar Trail System, protect viewsheds and user experiences, contribute to the resilience of the landscape, and align with fire mitigation techniques described. Please consider adding these best practice recommendations to Design features listed in the following subsections: Recreational and Visual Resources (REC) (p. 83-84) and/or General Treatment Implementation (GEN) (p. 79.)
  1. Bull hogging or masticator treatments around the newest built trail infrastructure will create exaggerated damage because the soil in these areas isn't given adequate time to settle, which is a natural part of the trail development process. This situation could be compounded by new levels of erosion as a result of other treatments. Special attention will be paid to fire mitigation practices around new trail infrastructure.
  2. No chain dragging or masticating will be done within 50' of the trail center, on either side.
    - a. These activities are deleterious to trail infrastructure and require full rebuilding of the trail asset. There is trail infrastructure in the area currently marked as masticator. Special consideration for this best practice is requested.
  3. Crossing of the trail corridor will be minimized in all treatments. Slash will not be dragged across the trail corridor.
  4. Trails will not be used as mobilization routes.
  5. Trails will not be used as machinery staging areas.
    - a. Stacked burn piles will be kept a minimum of 50' from the trail.
  6. Stacked burn piles will be burned within five years.
  7. In addition to REC-4 on page 83, if an area is cleared immediately adjacent to trails, the linear length of the affected trail should not exceed 100 feet. The affected section of trail should be preceded and followed by sections with a minimum of 500 linear feet of uncleared trail to maintain the trail corridor, prevent erosion, and maintain user experience, and maintain the natural mosaic appearance.
  8. A 20' minimum buffer from the center of the trail on each side is recommended for hand-thinning and lopping.
    - a. If necessary, reduction of ladder fuels and special considerations to ensure that crowns of trees don't touch can be taken. Any vegetation with a greater than 4" DBH (diameter at breast height) should be retained.
    - b. Benefits: This treatment approach will protect the alignment of the trail, ensuring outdoor recreationists don't lose the trail, it will slow water erosion by protecting the older and larger trees, and still allows space for thinning and hazardous fuels reduction.

This will help minimize maintenance costs by mitigating erosion, and will still allow thinning and Rx fuels reduction.

9. Please commit to ongoing, proactive communication with the public and local organizations to protect safety and contribute to better trail user experiences.
- **Comment Two:** High-interest trails appear to be defined as “trails leaving from or returning to developed trail heads, downhill directional, and visitor use” trails (p. 84). We recommend a more robust definition and analysis of which trails are “high-interest and high use current and proposed trail segments” that includes consultation with local trails organizations that can provide qualitative and quantitative data to inform the definition and identification of these trail segments now and into the future. These organizations include, but not limited to Iron Trailcraft and the Utah High School Cycling League.

#### **Appendix C: Monitoring Plan (p.89-90)**

- **Comment One:** Introduced in Section 2.2.2 Alternative 2- Proposed Action (p. 20), Appendix C will guide ongoing monitoring and potential action for recreation resources, treatment of weeds, livestock grazing, and wildlife resources. As such, please include professional trail builders, local trail organizations, and local outdoor recreation organizations in monitoring and assessment for completed and future treatments. Your local trail stewards and user groups can provide invaluable perspective into how treatments are holding up, and how outdoor recreationists are experiencing the treated spaces. They also represent a volunteer-base asset that should not be overlooked when it comes to ongoing monitoring and maintenance of outdoor recreation infrastructure.
- **Comment Two:** Treatments listed in the Hazardous Fuels Reduction Project will result in increased soil erosion from wind and water. Appendix C does not adequately address how the need for more, ongoing maintenance of trails and recreational spaces will be addressed with staff or volunteers. It also doesn't address how the need for additional staff maintenance in this area will be funded. We feel these needs should be addressed in the Hazardous Fuels Reduction Project.

#### **Appendix D: Implementation Checklist (p. 91-92)**

- **Comment:** Introduced in Section 2.2.1 Alternative 2- Proposed Action (p. 20), Appendix D will be used to guide and document initial and ongoing treatment actions. Local partnering trail stewards and outdoor recreation non-profits were not engaged in initial scoping of this project. Please include professional trail builders, local trail organizations, and local outdoor recreation organizations in assessing and completing checklist activities as they continue in this area for completed and future treatments. Your local trail stewards and user groups can provide invaluable perspective into how treatments are holding up, and how outdoor recreationists are experiencing the treated spaces. They also represent a volunteer-base asset that should not be overlooked when it comes to ongoing monitoring and maintenance of outdoor recreation infrastructure.

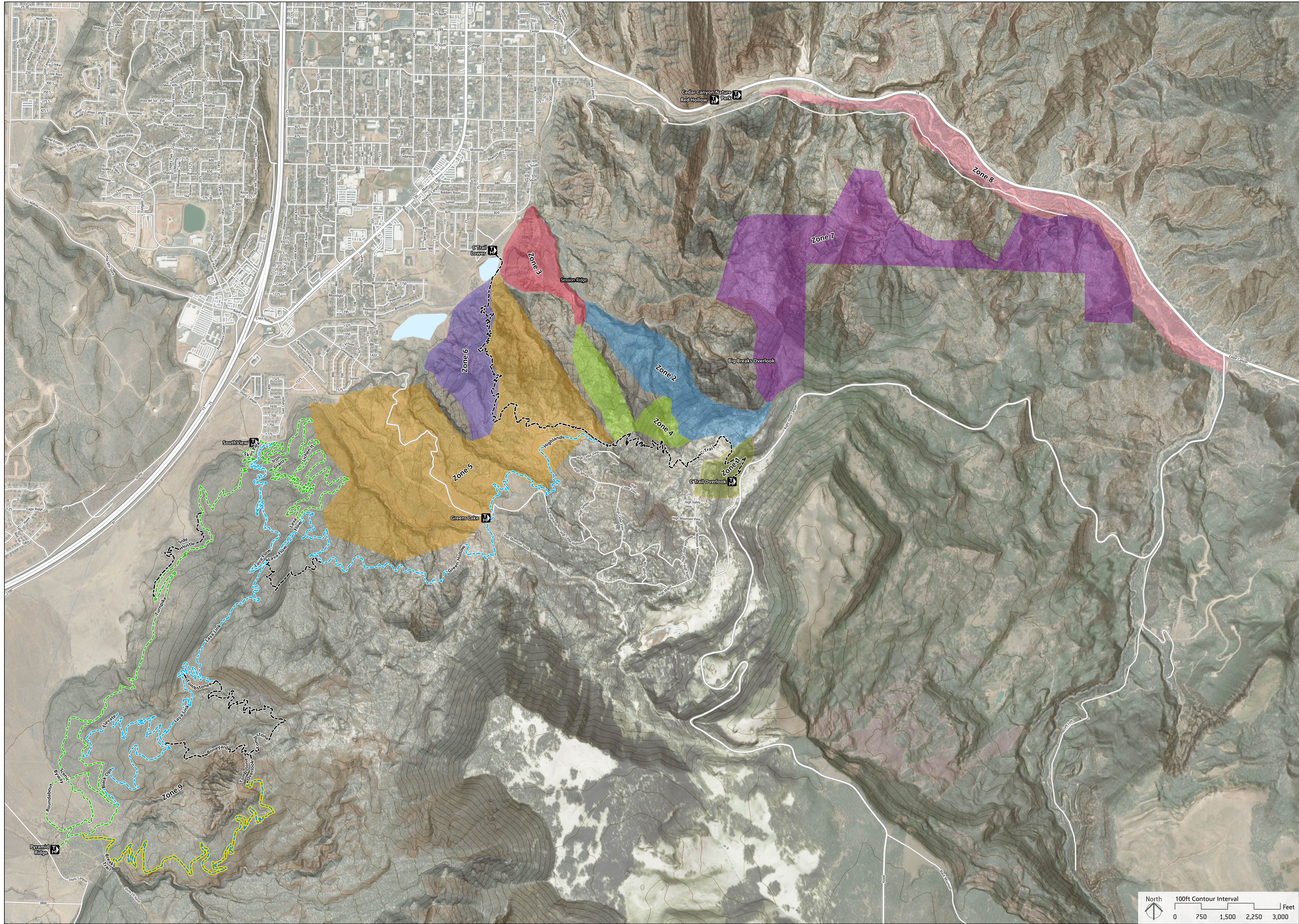




# UT Cedar City Shurtz Canyon EA Recreation

Client: Bureau of Land Management

- Legend**
- Site Access Points**
    - Trailhead
  - Cedar City Existing Trails**
    - Existing Beginner
    - Existing Intermediate
    - Existing Advanced
  - Trails Under Construction**
    - Intermediate Trail
  - Future Development Zones**
    - 1
    - 2
    - 3
    - 4
    - 5
    - 6
    - 7
    - 8



Date: August 2024  
 Prepared for:  
**BLM**

