

**To:** Ashcroft, Tyler[tashcrof@blm.gov]  
**From:** Angus, Allysia  
**Sent:** 2017-04-25T12:01:32-04:00  
**Importance:** Normal  
**Subject:** Re: word version of campground NEPA  
**Received:** 2017-04-25T12:02:16-04:00  
[Deer Creek Decision Record \(1\).docx](#)  
[Deer Creek EA FONSI \(1\).docx](#)  
[Deer Creek EA Final \(FINAL\).docx](#)  
[White House Decision Record FINAL.docx](#)  
[White House EA FONSI FINAL.docx](#)  
[White House EA FINAL appendices not inserted.docx](#)  
[Calf CreekRA ImprovementsEA FINAL \(1\).docx](#)

Here you go.

Calf Creek is being prepped for signature (don't laugh or copy some of it....if you read it carefully you'll see what a mean...I got an 8 page comment letter and the responses are entertaining if nothing else) and will change a tiny bit more (still waiting on IDT final input from wildlife). The other two were signed in the past couple years.

Am sending the FONSI and DRs too just in case they might also help you all. Let me know if you catch stuff in these that you think should be edited for future reference.

Good luck...

On Tue, Apr 25, 2017 at 8:40 AM, Ashcroft, Tyler <tashcrof@blm.gov> wrote:

Allysia,

About a month ago you and Jabe sent me PDF copies of Deer Creek, Whitehouse, and Calf Creek EAs. Do you have any those documents in word format so that I can plagiarize?

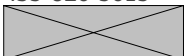
Phanks,

--

Tyler Ashcroft  
Project Manager  
Bureau of Land Management  
(801)-539-4068

--

**Allysia Angus**  
Landscape Architect / Land Use Planner  
***BLM - Grand Staircase-Escalante National Monument***  
755 W Main Street / PO Box 225  
Escalante UT 84726  
435-826-5615



The Presidential Proclamation and the Antiquities Act provide a clear mandate -- to protect the myriad historic and scientific resources in the Monument. To meet this objective, the Monument will be managed according to two basic principles. First and foremost, the Monument will remain protected in its primitive, frontier state.

Second, the Monument will provide opportunities for the study of scientific and historic resources.

*(GSENM Management Plan - 2000)*

# United States Department of the Interior Bureau of Land Management

Environmental Assessment  
DOI-BLM-UT-0300-2015-0013-EA

August 2016

## White House Recreation Site Improvements

**Location:** Highway 89, 43 miles East of Kanab, Utah  
Salt Lake Meridian, Kane County, Utah  
Township 43 South, Range 1 West, Sections 10 and 14

Grand Staircase-Escalante National Monument  
669 South Highway 89A  
Kanab, UT 84741  
Phone: (435) 644-1200  
Fax: (435) 644-1250



**NATIONAL  
CONSERVATION  
LANDS**

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## **White House Recreation Site Improvements**

### **DOI-BLM-UT-0300-2015-0013-EA**

#### **CHAPTER 1**

### **INTRODUCTION AND NEED FOR THE PROPOSED ACTION**

#### **INTRODUCTION AND BACKGROUND**

The Bureau of Land Management proposes to update and improve White House Recreation Site in Grand Staircase-Escalante National Monument (GSENM). See Appendix A – Project Area Map for project location and area. These existing recreation facilities are located in the Monument's Frontcountry Management Zone approximately 43 miles east of Kanab, Utah in Kane County.

The White House Recreation Site is approximately five acres and provides camping amenities and trailhead parking. It is located two miles south of Highway 89 and the Paria Contact Station at the end of Monument road #751 adjacent to the Paria River.

The site provides access for hikers and overnight backpackers hiking the Paria River into the Paria Canyon-Vermilion Cliffs Wilderness Area which is jointly managed by Vermilion Cliffs National Monument (VCNM) in the BLM- Arizona Strip Field Office and the BLM-Utah Kanab Field Office (KFO). VCNM and the KFO jointly administer the Special Recreation Permit Fee Program for hiking access into this area and the KFO and GSENM jointly administer the Recreational Use Permit (Expanded Amenity) Fee Program at White House Campground. A three-office Memorandum of Understanding (MOU) and annual operating plan guides the roles and responsibilities of each BLM office in administering and managing fees and operations at the White House Recreation Site.

The recreation site currently contains the following amenities and site fixtures:

- 2 car-camping sites and 3 walk-in campsites, with tables and fire rings
- 2 vault toilets
- A fee station with fee tube, register and information kiosks
- A gravel/natural surface parking lot
- A bicycle rack
- Fencing and cattle guard
- Small signs

Trash collection and water are available year-round at the Paria Contact Station.

Prior development of facilities at this recreation site was addressed in this environmental compliance document:

*White House Trailhead Campground Maintenance 92-35 CX (1992)* - The replacement of the existing vault toilets with two new SST vault toilets and an accessible walkway was authorized.

BLM has secured deferred maintenance funds to replace the vault toilets. Recreation fees would be used to fund the other site improvements. If approved, some of the proposed recreation site improvements could be implemented as soon as Summer 2016.

#### **PURPOSE AND NEED FOR THE PROPOSED ACTION**

The purpose of the proposed action is to replace old, deteriorated site amenities, slightly increase capacity for camping and trailhead parking, and improve the functionality and accessibility of the site, thereby improving the recreational experience for site users.

The White House Recreation Site facilities are deteriorating and do not meet visitor expectations for site functionality. The current site layout is disorganized, inefficient, and confusing to use, and some aspects of the site do not meet the *Architectural Barriers Act Accessibility Guidelines for Outdoor Developed Areas*. The lack of natural shade currently limits camping use, especially during summer months. These issues diminish the quality of the recreational experience provided for visitors.

The old vault toilets in the campground do not meet accessibility standards, do not vent properly, and have deteriorated to the degree that they've been sided with plywood. Two of the campsites are adjacent to the parking area and the remaining three are up on the hill scattered in the trees. They are poorly defined and have little to no shade. The parking area, which is used by both campers and those hiking into the canyon, is a long oval marked with many small signs directing users how to park because it is not intuitive. It is highly likely that users doing multi-day backpack trips down the Paria River park adjacent to the campsites, blocking ready access for days for those wishing to car camp. The fee station area with information about both the White House camping fees and overnight and day-use fees for the Paria Canyon Permit Area is often confusing for the public to use and understand.

#### **CONFORMANCE WITH BLM LAND USE PLAN**

The proposed action is in conformance with the *Grand Staircase-Escalante National Monument Management Plan* (MMP), effective February 2000, and is supported by the following plan decisions:

**FAC-6** *All facilities and parking areas will be designed to be unobtrusive and to meet the visual resource objectives.*

**FAC-10** *Calf Creek and White House Campgrounds are the only developed campgrounds in the Frontcountry Zone.*

**FAC-12** *Existing parking areas may be better delineated with barriers to prevent further expansion. Parking areas could accommodate up to 30 vehicles, but most will be designed for fewer than 10 cars. Construction of small spur routes or trails may be allowed to access parking areas or other facilities. Trails and parking areas will not be paved.*

The project area is in the Frontcountry Zone where facilities are allowed for visitor use, safety, interpretation, and the protection of Monument resources. It is also located within the HWY 89 Special Recreation Management Area where the recreation experience is to focus on learning about

geology, history, archaeology, biology, and paleontology, in addition to scenic viewing, and opportunities provided are to accommodate all visitors.

#### **RELATIONSHIPS TO STATUTES, REGULATIONS, AND OTHER PLANS**

The proposed action complies with federal environmental laws and regulations, Executive Orders, and Department of Interior, BLM, and GSENM policies and is consistent with state laws and local and county ordinances and plans, including the following:

##### *Omnibus Public Land Management Act of 2009*

The Omnibus Public Land Management Act (OPLMA) established the National Landscape Conservation System (NLCS) in order to conserve, protect, and restore nationally significant landscapes that have outstanding cultural, ecological, and scientific values for the benefit of current and future generations. The Act goes on to require that NLCS units, of which GSENM is one, be managed in a manner that protects the values for which the components of the system were designated. The NLCS includes National Monuments, Wilderness Study Areas, and Wild and Scenic Rivers. The proposal was designed to meet the objectives of OPLMA.

##### *Federal Lands Policy and Management Act of 1976*

The Federal Land Policy and Management Act (43 U.S.C. 1701-1712) directs the development of land use plans for BLM lands. Once land use plans are developed, any approved project must be provided in the land use plan or be consistent with the terms, conditions, and decisions in the approved land use plan. As noted above, this project conforms to the land use plan.

##### *Endangered Species Act of 1973*

The Endangered Species Act (ESA) provides for conserving endangered and threatened species of plants and animals. It requires that federal agencies consult with the U.S. Fish and Wildlife Service to ensure that any actions that they authorize, fund, or carry out are not likely to jeopardize the continued survival of a listed species or result in the adverse modification or destruction of its critical habitat. This proposal was designed to avoid impacts to species listed under ESA.

##### *National Historic Preservation Act of 1966*

The National Historic Preservation Act requires federal agencies to take into account the effect of any undertaking on historic resources and to provide the Advisory Council on Historic Preservation a reasonable opportunity to comment on the undertaking. Federal agencies must determine whether the undertaking is a type of activity that could affect historic properties. Historic properties are ones that are included on the National Register of Historic Places or that meet the criteria for inclusion on the National Register. If the agency determines that it has no undertaking, or that its undertaking is a type of activity that has no potential to affect historic properties, the agency has no further Section 106 obligations.

##### *Wild and Scenic Rivers Act of 1968*

The Wild and Scenic Rivers Act (WSRA) requires BLM to identify all rivers on BLM-administered lands that possess free-flowing condition or outstanding remarkable values and therefore may have potential for addition to the National Wild and Scenic River System (NWSRS). The Paria River, from its source on the Paunsaugunt Plateau to where it meets the Colorado River, was inventoried and approximately 112 miles of the main stem of the Paria River and its tributaries were recommended suitable for inclusion in the NWSRS as required by Section 5(d) (1) of the WSRA. BLM's policy goal



for inventoried eligible or suitable Wild and Scenic River segments is to manage and maintain their free-flowing condition, water quality, tentative classifications, and any identified outstanding remarkable values (ORV) until designated or released in a subsequent land use plan.

*Federal Lands Recreation Enhancement Act of 2004*

The Federal Lands Recreation Enhancement Act (FLREA) provides legal criteria for the collection of recreation fees at federal campgrounds or expanded amenity sites. It also directs BLM to provide a specific set of amenities in order to collect fees in campgrounds or special management areas.

*Architectural Barriers Act (Public Law 90-480)*

The Architectural Barriers Act (ABA), enacted in 1968, requires that all buildings and facilities constructed in whole or in part using Federal funds must be accessible to, and usable by, physically disabled persons. This includes any construction, renovation, restoration, remodeling, or site development completed by Federal agencies.

*Grand Staircase-Escalante National Monument Proclamation (1996)*

The Proposed Action and No Action Alternative have been evaluated for consistency with the Proclamation, particularly in reference to the specific objects that were identified within the Proclamation. No effects of the proposed action, with the included design features, are anticipated on any of objects identified within the Proclamation.

*BLM Manual 6220 – National Monuments, National Conservation Areas, and Similar Designations (2012)*

BLM Manual 6220 states that “BLM will inventory existing facilities within Monuments and National Conservation Areas and determine whether to remove, maintain, restore, enhance, or allow natural disintegration of each facility” (p. 1-10). White House Campground is identified in the GSENM Management Plan as one of “the only developed campgrounds” in the Frontcountry Management Zone. The proposed action will maintain and improve this existing facility.

*BLM Manual 6400-National Wild and Scenic Rivers (2012)*

Manual 6400-National Wild and Scenic Rivers (3.6.D.Recreation Development) states that a tentative recreational classification “does not require extensive recreation development”, but rather “should harmonize with natural and cultural settings and be screened from view of the river where possible” (p. 3-11). The proposed project is consistent with this policy direction.

*Final Guidelines for Outdoor Developed Areas - Published in the Federal Register September 26, 2013. 36 CFR Part 1191 RIN 3014-AA22*

The final rule amends the ABA Accessibility Guidelines by adding scoping and technical requirements for camping facilities, picnic facilities, viewing areas, trails, and beach access routes constructed or altered by or on behalf of federal agencies. The final rule ensures that these facilities are readily accessible to and usable by individuals with disabilities.

*BLM Guidelines for a Quality Built Environment*

The BLM Guidelines for a Quality Built Environment directs BLM to provide facilities that are sustainable, attractive, functional, cost-effective, and responsive to place and setting.

Kane County Resource Management Plan-Revised February 2015

Although the White House Recreation Site is not specifically mentioned in the *Kane County Resource Management Plan*, a review of the document suggests that this proposal would not conflict with the county plan. The county plan does note support for recreation opportunities on page 73:

*It is the county's position that federal and state land managers should do everything possible to enhance recreational opportunities on public lands.*

Paria Canyon-Coyote Buttes Special Management Area Draft Business Plan (2016)

The proposed action is consistent with the current and future vision of fee program operations conducted at White House Campground and Trailhead contained in the Draft Business Plan currently being reviewed with approval anticipated in late 2016.

**IDENTIFICATION OF ISSUES**

During preparation of the EA, the public was first notified of the proposed action by posting on the BLM National Environmental Policy Act (NEPA) Register on January 27, 2015. No individuals or groups contacted the BLM in response to that notice. During the interdisciplinary review by BLM specialists the following issues were identified:

*Issue A: Recreation - How would the proposed upgrades and improvements at the White House Recreation Site affect the recreation experience?*

*Issue B: Wild and Scenic Rivers-How would the proposed upgrades and improvements affect Wild and Scenic River suitable segments or outstanding remarkable values of the Paria River?*

*Issue C: Visual Resources - Would the proposed site developments create visually contrasting impacts that alter the landscape character?*

**SUMMARY**

This chapter has presented the purpose and need of the proposed project, as well as the relevant issues, i.e., those elements of the human environment that could be affected by the implementation of the proposed project. In order to meet the purpose and need of the proposed project in a way that resolves the issues, the BLM has considered and/or developed a range of action alternatives. These alternatives are presented in Chapter 2. The potential environmental impacts or consequences resulting from the implementation of each alternative considered in detail are analyzed in Chapter 4 for each of the identified issues.

## CHAPTER 2

### DESCRIPTION OF ALTERNATIVES

#### INTRODUCTION

This Environmental Assessment reviews a No Action Alternative and the Proposed Action. The No Action Alternative provides a baseline for comparison of the impacts of the Proposed Action.

#### PROPOSED ACTION

BLM is proposing to upgrade and improve the White House Recreation Site, including providing separate areas for the campground and the trailhead. GSENM would use BLM deferred maintenance, recreation site user fees, and grants to pay for the proposed improvements. Contractor, BLM force account or maintenance staff, and/or volunteer labor could be used to perform the work. Some construction is slated to begin in summer 2016. Full implementation of the proposed action would occur as funds become available.

The proposed action (See Appendix B – Site Design) includes the following:

##### Campground:

- Construct up to seven camping units with adjacent parking, tent pads, picnic tables, shade shelters, and fire rings
- Designate up to five walk-in campsites with picnic tables, tent pads, and fire rings across the wash on the hill
- Designate parking spaces for five walk-in campsites
- Define a path to walk-in campsites
- Install base material to raise, define, and improve surface stability of campsites
- Install campsite numbering posts
- Install fee station with kiosk and fee tube
- Improve traffic flow by establishing a median and one way traffic flow
- Limit campground to vehicles 25 feet or less

##### Trailhead:

- Construct new trailhead with up to 14 standard size parking spaces and two oversize vehicle parking spaces
- Install fee station with kiosk, fee tube, and register
- Reroute access trail to Paria River from trailhead

##### General:

- Between campground and trailhead, install a double vault toilet with adjacent parking
- Construct two picnic sites with shade shelters and picnic tables across from the trailhead
- Install new NLCS standard site signs and other site signs as needed
- Install bike rack
- Install barriers (fencing and/or boulders) as needed to protect vegetation and define edges of parking and driving areas

- Use gravel/road base to stabilize all driving surfaces
- Relocate/replace cattle guard and install fencing around trailhead that ties into existing fencing
- Remove all old, deteriorated infrastructure and dispose of properly

During construction the recreation site would be closed to the public. This would be accomplished by blocking the access road near the Paria Contact Station since there would be no turnaround available while the site is under construction. A variety of heavy, motorized equipment would be used during construction, including but not limited to a dump truck, crane, front-end loader, skid-steer loader, and tractor. Work would be done during daylight hours (7 am to 6 pm). During construction, equipment would be parked at the project site. As the project is likely to be constructed in phases, the campground is unlikely to be closed to the public more than four weeks in any one phase.

General maintenance would be performed by BLM staff or contractors at the proposed facilities once construction is completed.

*BLM's Guidelines for a Quality Environment* was used to plan and would be used to design this project, seeking to meet the agency's goals of developing facilities that are sustainable, functional, accessible, cost effective, and responsive to place and setting. *Accessibility Guidelines for Outdoor Developed Areas* would also be used to design this project to ensure that these facilities are readily accessible to and usable by individuals with disabilities.

Design criteria to meet built environment image guidelines and other mandates would include the following:

- Natural or natural-appearing materials would be used. These could include concrete, natural stone, road base, gravels or fines, rusted or painted metal, and/or wood.
- No shiny, reflective materials would be used.
- Natural palette colors would include blacks, grays, reds, rusts, browns, and buffs. No bright colors such as whites or yellows would be used (except for lettering on signs).
- Native plant container stock and/or native plant seeds would be used to revegetate areas impacted during construction.

In order to prevent unnecessary resource impacts, the following design features would be required and incorporated into project construction, scheduling and monitoring:

- Construction limits would be staked and flagged to protect vegetation and soils during construction.
- To prevent the spread of invasive and noxious weeds, equipment would be washed before transport to the construction site.
- The project site would be monitored for noxious and invasive vegetation after construction. If noxious weeds or non-native, invasive plants are discovered, BLM-approved weed treatments would be applied in a manner consistent with current BLM practice.
- All construction would take place outside of the migratory bird breeding and brood raising period from April 15 to July 15.

To inform the public of the construction closures, BLM would do the following:

- Issue a press release to relevant media outlets.

- Publish notice on GSENM website.
- Post closure signs at visitor centers and in the local communities.
- Work with the Kane County Office of Tourism to do outreach to visitors.

**No ACTION**

Under the No Action Alternative, BLM would not improve and update the White House Recreation Site. BLM would not provide any of the improvements or facilities in the Proposed Action. Under this alternative the outdated vault toilets would continue to be used by the public; site functionality and accessibility would not be improved; and the recreation experience for visitors would not be improved.

## CHAPTER 3

### AFFECTED ENVIRONMENT

#### INTRODUCTION AND GENERAL SETTING

The affected environment was considered and analyzed by an interdisciplinary team as documented in the Interdisciplinary Team Checklist (See Appendix C – IDT Checklist). The checklist indicates which resources are either not present in the project area or would not be impacted to a degree that requires detailed analysis. Resources which are predicted to be impacted are described in Chapter 3 and impacts on these resources are analyzed in Chapter 4. Recreation, Wild and Scenic Rivers, and Visual Resources were identified by the Interdisciplinary Team as potentially affected by the Proposed Action.

The White House Recreation Site is located at the end of Monument Road #751 south of HWY 89 between Kanab, Utah and Page, Arizona. The project area is located between the Paria Plateau and the Kaiparowits Plateau adjacent to the Paria River just before it flows into Paria Canyon at an elevation of 4,400 feet. The landscape in the area is typified by colorful sandstone outcrops, a wide meandering riverbed, and open desert expanses. Predominant vegetation in the area is grasses, desert shrubs, and scattered pinyon and juniper trees. The recreation site is constrained by the river on one side and sandstone outcrops on the other.

#### Resource A: Recreation

##### *White House Campground*

White House Campground is one of only three developed campgrounds within GSENM and the only BLM campground on the south side of the Monument. It is a small primitive campground with five designated sites including three walk-in sites, two vault toilets, one fee station with interpretive signage, and one parking area for all users. Water and trash disposal are available year-round near the Paria Contact Station.

The loss of two large trees in 2014 removed shade from the two car camping sites; these two sites along with the three walk-in sites experience heavy sun. There is on-going soil erosion within the area from numerous social trails.

During 2015, BLM issued 444 permits for a total of 681 visitors in the campground. Average on-site visitation over the past five years indicates May, June, September, and October as the busiest months. Those using the area for recreation are typically engaged in car camping, hiking, backpacking, picnicking, biking, photography, and viewing cultural sites or geologic features in the vicinity. Increased visitation to south-central Utah brings more visitors to the area who disperse camp along many of the Monument's side roads and turn-outs.

##### *White House Trailhead*

White House Trailhead is one of four trailheads that access Paria Canyon-Vermilion Cliffs Wilderness Area. Paria Canyon is widely recognized as one of the longest and most stunning slot canyons in the world. Here, the river winds downward through seven geologic layers, eventually ending at the Colorado River just below Glen Canyon Dam. The route from this trailhead through the entire system is 38 miles and takes the average backpacker four to five days to complete.

Approximately 2.6 miles downstream from the recreation site, the Paria River flows across the GSENM boundary into the 20,254 acre Paria Canyon/Coyote Buttes Special Management Area (SMA) established in 1997 on BLM lands in both Arizona and Utah. The SMA is entirely within the 112,190 acre Paria Canyon-Vermilion Cliffs Wilderness Area on lands managed by BLM in both VCNM and the KFO (See Appendix D – SMA Map). The intent of the SMA is to provide for long-term protection and preservation of wilderness character and management for the use and enjoyment of visitors in a manner that will leave wilderness unimpaired. In order to achieve these goals, the number of people allowed to visit the SMA for overnight use is limited via fee permits available through an advance online reservation system. Day-use hiking in the Paria River on GSENM for the two miles prior to the wilderness boundary is free and does not require a permit.

Historically the White House Trailhead has been used as a staging area for hikers accessing the Paria Canyon-Vermilion Cliffs Wilderness Area. Trailhead permit data for 2015 recorded a total of 964 hikers accessing the Paria Canyon from this location. Day-use hikers who obtained a permit at the on-site fee station numbered 536. An additional 428 overnight hikers used this trailhead for Paria Canyon entry after obtaining permits through the advance online reservation system.

Fee monies are reinvested back into the sites where they are collected per FLREA which guides collection and expenditures of fee monies.

#### **Resource B: Wild and Scenic Rivers**

Approximately 122 miles of the Paria River and its tributaries are recommended as suitable for inclusion in the NWSRS. The proposed project area for the White House Recreation Site and the actual river bottom hiking route lies within the Lower Paria River-1 segment which is recommended as a suitable segment for inclusion in the NWSRS. The area of evaluation included in the suitability determination is usually measured 1/4 mile from the mean high-water mark on both sides of the river. This project is located within approximately 1/8 of a mile from the mean high-water mark. This segment extends downriver to the GSENM boundary and has a tentative classification as *Recreational*. The WSR suitability recommendation also identifies the following Outstanding Remarkable Values (ORVs): high quality scenery, narrow canyon, outstanding opportunities for hiking, backpacking, photography, and nature viewing.

#### **Resource C: Visual Resources**

##### *Characteristic Landscape*

The proposed project area is located in the south central portion of the Monument between the Paria Plateau and the Kaiparowits Plateau adjacent to the Paria River just before it flows into Paria Canyon. In this location the flash-flood prone Paria River flows through a wide, dynamic channel that support minimal riparian vegetation. The dominant vegetation in the project area is desert shrubs, grasses, and pinyon and juniper trees. The vegetation is a full range of greens, from light golden green to sage green to dark juniper green, and ranges from medium to coarse in texture. The built elements in this landscape include the dirt/gravel road, vault toilets, fencing, a cattle guard, a multi-panel information kiosk, picnic tables, fire rings, and signs. Most of the built elements are small in scale. The most visible elements in this landscape are the two vault toilets located in the middle of the viewshed and the vehicles used by recreationists when they are present. As the

project area is located at the end of Monument Road #751 about 2 miles down from the highway, it is only seen by those travelling to the site.

The project area is within an enclosed landscape created by the rock outcrops and other landforms that have been carved through by the Paria River. The predominant lines are rounded and horizontal created by landform edges. The river channel adds a curving band through the landscape whereas the road adds an axis focusing attention on the project area. The predominant colors of this landscape are buffs, dark reds, salmons, greens, and grays due to the landform and vegetation. The texture of the landscape varies from medium due to the upland vegetation and landforms to coarse due to the rock outcrops. This project is proposed in a classic Southern Utah, canyon country landscape with exposed red and white sandstone and desert vegetation similar to other areas within the Colorado Plateau.

Monument Road #751, the campground, and the trailhead are used primarily by recreationists. Those using the area for recreation are typically engaged in car camping, hiking, backpacking, picnicking, biking, and photography. This range of individuals defines the casual observer.

#### *Visual Resource Management Classes and Objectives*

The proposed White House Recreation Site Improvements project area is located in Visual Resource Management (VRM) Class II. The objective for VRM Class II is to retain the existing character of the landscape. The level of change to the characteristic landscape should be low. Management activities may be seen, but should not attract the attention of the casual observer. Any changes must repeat the basic elements found in the predominant natural features of the characteristic landscape.



## CHAPTER 4

### ENVIRONMENTAL IMPACTS

#### PROPOSED ACTION

This section analyzes the impacts of the proposed action to those resources described in the Affected Environment, Chapter 3, above.

#### Resource A: Recreation

##### *Campground Effects*

Implementing proposed upgrades and improvements at the White House Recreation Site would offer direct benefits to the visiting public. Site users would benefit from having new, updated, and more accessible campsites and toilets. The new toilets, picnic tables, fire rings, and tent pads would increase physical accessibility to site amenities. New campsite designs would meet the legal guidance for public access at the site and offer access to a wider range of users including family groups with elder members. Newly defined parking spaces would be provided to access the walk-in sites as well as immediately adjacent to the camping units which would make the site more functional and intuitive to use. Shade structures would provide much-needed respite from the heat during the high temperature months. Defined walking paths would curb erosion from social trails. Impacts to vegetation and soils would be reduced with new site designs directing or containing uses to specific areas within the site. The new campground fee station would include regulatory and orientation information as well as offer interpretation making it easier for campers to understand how to use the area. Collectively the site improvements would enhance the visual ambience of the entire site.

Providing increased and more attractive camping opportunities at this location could create increased demand in a location where use has historically been low. However, rough road access, heat, and a lack of water are anticipated to continue to limit demand for many users searching for a destination campground. Limiting the campground to vehicles 25 feet or less responds to the limited amount of space for expansion of the site and also would help retain the natural setting of the area. Private campgrounds in the area offer a greater range of amenities that would continue to have broader appeal to many campers and those with larger recreational vehicles.

##### *Trailhead Effects*

Creating trailhead parking separate from the campground would provide an obvious location to park for the large number of hikers accessing Paria Canyon, avoiding conflicts or congestion with campers. The new trailhead fee station would include regulatory and orientation information as well as offer interpretation making it easier for hikers to understand how to use the area.

##### *Effects for Both Campground and Trailhead*

Short term effects for both the campground and trailhead would include displacement of the public during construction.

## **Resource B: Wild and Scenic Rivers**

### *Effects to Tentative Classification*

This NWSRS segment has a tentative classification as *Recreational*. The proposed recreation facility improvements at White House Recreation Site would benefit campers and hikers recreating along this segment. The campground and trailhead will continue to be visible from the river corridor. As per the visual resources determination, facility colors and materials are anticipated to blend with the surrounding natural landscape minimizing the visual intrusion to those hiking within the river corridor. Modest development of facilities on the river bank and within the corridor would not threaten tentative classification.

### *Effects to Outstanding Remarkable Values*

The identified ORVs of the Paria River include Recreational, Scenic, Geologic, Riparian, and Historic. Enhancing recreational use along this section of the river is consistent with the Recreational ORV which specifically identifies “outstanding opportunities for hiking, backpacking, photography and nature viewing” along the Paria River. Design features insure there would be no threat to the other ORVs on this segment from the effects of the proposed facility enhancements.

### *Effects to Wild and Free-flowing and Water Quality*

There would be no threat to the wild and free-flowing nature or water quality from this proposal.

Project implementation is not anticipated to result in any threat to NWSR suitability for this river segment.

## **Resource C: Visual Resources**

BLM’s Visual Resource Management program includes a standardized system to review lands actions for resource management plan conformance. Visual contrast rating worksheets are completed to determine if a project impacts visual resources as well as if it conforms to the resource management plan.

In order to evaluate the environmental consequences of the Proposed Action, a linear key observation point (KOP) was established along Monument Road #751 as part of completing the contrast rating analysis. Along most of the linear KOP the project elements would not be visible until within close proximity to the site. Once the casual observer is within one mile of the project area, the toilet, shade shelters, and parked vehicles when present, would be the primarily visible elements. The remaining elements (signs, kiosk, fencing, tent pads, picnic tables, etc.) would come into view once the observer is within close proximity. The project would not be visible from HWY 89 due to the distance and topography that diminishes or obscures the view down the canyon.

During construction, temporary visual impacts could result from the visibility of construction equipment and site work. Post-construction, the contrasts in form, line, color and texture created by the site improvements when compared to the characteristic landscape would be weak, which is similar to what currently exists.

The proposed improvements would be sited in locations currently developed for the same purposes. The campground and trailhead would be located on the floor of a broad river canyon surrounded by distinct landforms. The toilet, shade shelters, and other fixtures would be constructed of materials

that blend with the natural environment minimizing the color and textural contrast they would create. By constructing the project according to the outlined design criteria and implementation measures, the weak to negligible changes to the existing character of the landscape would be appropriate to meet the visual resource management objectives of the area.

## **No ACTION**

### **Resource A: Recreation**

In the No Action Alternative the general public would not see any changes at the recreation site. No deferred maintenance would be implemented thereby all current facilities would remain the same. Resource and visitor impacts (i.e. vegetation and soil tramping, lack of shade, erosion, and roadway congestion) would continue. The public would continue to use dilapidated, inaccessible, and unattractive amenities and be confused as to how to use the site.

### **Resource B: Wild and Scenic Rivers**

In the No-Action alternative impacts would remain the same and the opportunity to improve recreational opportunities and access to the Paria River would not occur. Current conditions are not expected to threaten tentative classification, wild and free-flowing nature, water quality, or outstanding remarkable values. Current conditions are not anticipated to threaten long-term suitability for designation.

### **Resource C: Visual Resources**

In the No-Action Alternative the impacts to visual resources would remain the same.

## **CUMULATIVE IMPACTS**

Cumulative impacts are those impacts resulting from the incremental impact of an action when added to other past, present, or reasonably foreseeable actions regardless of what agency or person undertakes such other actions.

### **Resource A: Recreation**

BLM has not identified any cumulative impacts for recreation related to upgrading and expanding this recreation site that has existed for decades.

### **Resource B: Wild and Scenic River**

There are no known cumulative impacts to this Wild and Scenic River suitable segment of the Paria River.

### **Resource C: Visual Resources**

*Cumulative Impact Area (CIA)*

Visual Resources - The cumulative impact area of analysis for Visual Resources is the viewshed along HWY 89 between the Cockscomb and Cottonwood Road extending south from the highway along Monument Road #751.

*Cumulative Impact Analysis*

The cumulative impacts to visual resources from past, present, and reasonably foreseeable actions include recreational facilities (trailheads, contact stations, etc.), general recreational use, private property development (residential, commercial and industrial), road construction and maintenance activities, utility corridors, and livestock grazing management facilities (corrals, fences, water developments, storage buildings, etc.). The action alternative would make improvements to existing facilities using elements that would blend with the landscape. These facilities are visible only when in close proximity to the site and are small in scale within this grand scale landscape. They would not contribute to an increase in impacts to visual resources in the area.

## CHAPTER 5

### CONSULTATION AND COORDINATION

#### INTRODUCTION

The issue identification section of Chapter 1 identifies those issues analyzed in detail in Chapter 4. The IDT Checklist (See Appendix C.) provides the rationale for issues that were considered but not analyzed further.

#### LIST OF PERSONS, AGENCIES, AND ORGANIZATIONS CONSULTED

**Table 5.1. List of Persons, Agencies, and Organizations Consulted**

Name	Purpose & Authorities for Consultation or Coordination	Findings & Conclusions
Allan Bate	GSENM Range Specialist	Discussions with livestock permittee about cattle guard and fencing.
Lane Little	Livestock Permittee	Replacement of cattle guard along new fence alignment necessary. Tie new fencing to old fencing that goes across Paria River.

#### SUMMARY OF PUBLIC PARTICIPATION

During preparation of the EA, the public was notified of the proposed action by posting on the BLM National Environmental Policy Act (NEPA) Register on January 27, 2015. No individuals or groups contacted the BLM in response to that notice. Notification of the availability of the EA for a 30-day comment period was mailed to more than 74 individuals and organizations. The comment period began on April 19, 2016 and ended on May 20, 2016. Notification of the availability of the EA for review was also posted on the BLM NEPA Register on April 19, 2016 and a press release was sent to local area newspapers on April 21, 2016.

#### COMMENT ANALYSIS AND RESPONSE TO PUBLIC COMMENTS

During the 30-day comment period, BLM received eight emails from four individuals or organizations. One commenter supported the project as proposed. One did not support the project. The other two commenters either provided clarification regarding the site and how it is used or made suggestions for additional programming. The suggestion to construct a “gathering area” for programming such as night sky viewing was not added at this location because it did not meet the purpose and need for the project; however, BLM is considering this suggestion for future site developments along the HWY 89 corridor. Another suggestion was made to construct the project in one phase to avoid unnecessary site closures. Though BLM would also prefer to construct all improvements at once, funding for this project is only partially secured, thus it is necessary for BLM to seek additional funding and make improvements as funding becomes available. The agency

will close the recreation site for construction the minimum necessary so as to reduce the amount of time the public is unable to use it.

Substantive comments received pertained to the following and are addressed in Table 5.2. below:

- Distance of vault toilet to camping units
- Size of vehicles that would be allowed in campground
- Need to replace the cattle guard and fencing
- Potential for Paria River flooding to wash away the access road

**Table 5.2. Response to Public Comments**

Topic	Comment	BLM Response
Distance of vault toilet to camping units	The walk-in sites will be a fair distance away from the toilets which could cause problems with human waste.	The distance from the new toilet location to the back of the walk-in camping area is approximately 500 feet. There is no BLM standard for maximum distance from a camping unit to the toilet though some other public campground design references suggest a 400 feet maximum distance. Given the small size of this development - the new double vault toilet will service up to 12 campsites and the trailhead (with parking for up to 16 vehicles), an additional toilet for the five walk-in camping units would not seem initially warranted. Should BLM's post-construction monitoring determine that a human waste problem is occurring, the agency will take necessary steps to address the issue.
Paria River flooding and White House Road access issues	Flooding of the Paria River has the potential to wash away segments of White House Road, making access to the recreation site impossible.	The issue of the Paria River cutting into the edge of the White House Road was discussed internally by BLM at the onset of this project planning effort. BLM decided not to include the rerouting of the road to the east in this planning effort. The agency plans to analyze rerouting the road in a future planning effort.
Need for fence and cattleguard	The cattle guard has been filled in with sand (by the wind) for several years and is nonfunctional. It and the fence it is attached to are not needed and of no use because the permittee has put up a fence along the east side of the White House Road. The fence attached to the filled in cattle guard was originally strung across the Paria River, but only survived for a few months and was washed away in the first flood that came through and never repaired. Thus the fence and cattle guard are hardly necessary as they are both nonfunctioning.	The permittee of the Bunting Well allotment is still authorized under his grazing permit to graze the area east of the White House Road. Also, this area is still available for livestock grazing and the permittee has expressed a desire that he be able to use this area sometime in the future. Should that occur, the cattle guard would need to be in place to keep cattle out of the recreation site. The new segment of fence would be routed around the trailhead to join with the existing segment that goes toward the river. Maintenance of the fences would need to be completed before cattle are placed east of the White House Road.

Request for tent camping only in campground	BLM does not need to develop a RV camp in this location that has normally, almost exclusively served tent campers. RVs are not appropriate for the site due to their size, the condition of the access road, and the limited amount of space at the site.	BLM agrees that oversize vehicles are not appropriate for the campground due to the limited amount of space and setting characteristics of this location. The EA has been adjusted to include a limitation on vehicle size at the campground to 25 feet or less. The new trailhead design includes parking for two oversize vehicles. Signs will be installed to inform users of the size limitations.
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#### LIST OF PREPARERS

BLM staff specialists who determined the affected resources for this document are listed in Appendix C. Those who contributed further analysis in the body of this EA are listed below.

**Table 5.3. List of Preparers**

Name	Title	Responsible for the Following Section(s) of this Document
Allysia Angus	Project Lead Landscape Architect	Technical Coordination Quality Control MMP Compliance Impact Analysis for Visual Resources Site Design
David Barfuss	Engineer	Site Design Engineering
Lora Gale	Outdoor Recreation Planner	Impact Analysis for Recreation Impact Analysis Wild and Scenic Rivers
Amber Hughes Cindy Ledbetter	Planning and Environmental Coordinator	NEPA Compliance Quality Control

## **CHAPTER 6**

### **REFERENCES AND ACRONYMS**

#### **REFERENCES CITED**

Bureau of Land Management. *Guidelines for a Quality Built Environment*. 2010. Available at: [http://www.blm.gov/pgdata/etc/medialib/blm/wo/Planning\\_and\\_Renewable\\_Resources/recreation\\_images/national\\_programs/VRM.Par.62809.File.dat/GQBE\\_WEB.pdf](http://www.blm.gov/pgdata/etc/medialib/blm/wo/Planning_and_Renewable_Resources/recreation_images/national_programs/VRM.Par.62809.File.dat/GQBE_WEB.pdf).

Architectural and Transportation Barriers Compliance Board. *Architectural Barriers Act Accessibility Guidelines; Outdoor Developed Areas*. Washington, DC. 2013. <http://www.access-board.gov/guidelines-and-standards/recreation-facilities/outdoor-developed-areas/final-guidelines-for-outdoor-developed-areas>.

#### **LIST OF ACRONYMS**

BLM - Bureau of Land Management  
EA - Environmental Assessment  
ESA - Endangered Species Act  
GSENM - Grand Staircase-Escalante National Monument  
IDT - Interdisciplinary Team Checklist  
KOP - Key Observation Point  
MMP - Monument Management Plan  
NEPA - National Environmental Policy Act  
NLCS - National Landscape Conservation System  
NWSR – National Wild and Scenic River  
OPLMA - Omnibus Public Land Management Act  
ORV - Outstanding Remarkable Values  
VRM - Visual Resource Management



**APPENDIX A**  
**WHITE HOUSE RECREATION SITE PROJECT AREA MAP**

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**APPENDIX B**  
**WHITE HOUSE RECREATION SITE DESIGN DRAWING**

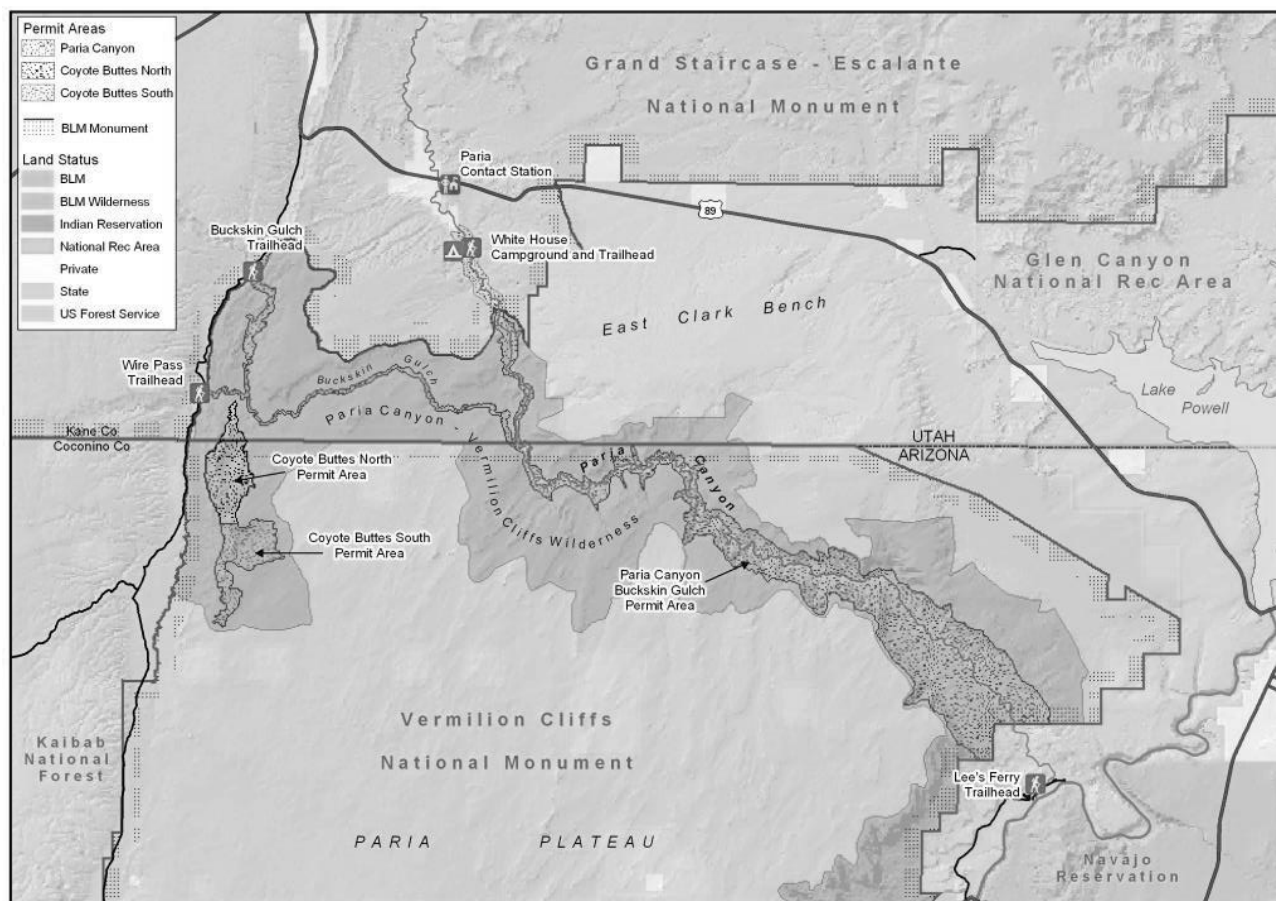
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**APPENDIX C**  
**INTERDISCIPLINARY TEAM CHECKLIST**

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## APPENDIX D

### PARIA CANYON/COYOTE BUTTES SPECIAL MANAGEMENT AREA MAP



**United States Department of the Interior  
Bureau of Land Management**

**Finding of No Significant Impact**

**Deer Creek Campground and Trailhead Improvements**

**Environmental Assessment  
NEPA No. DOI-BLM-UT-0300-2015-0016-EA**

**September 2015**

***Location:*** Burr Trail Road, 8 miles southeast of Boulder, Utah  
Salt Lake Meridian, Garfield County, Utah  
Township 34 South, Range 5 East, Section 16, NE 1/4

Grand Staircase Escalante National Monument  
669 South Highway 89A  
Kanab, Utah 84741  
Phone: (435) 644-1200  
Fax: (435) 644-1250



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## **FINDING OF NO SIGNIFICANT IMPACT**

### **Deer Creek Campground and Trailhead Improvements Environmental Assessment NEPA No. DOI-BLM-UT-0300-2015-0016-EA**

#### **INTRODUCTION**

The Bureau of Land Management (BLM) has prepared an environmental assessment for a proposed action to upgrade and improve the facilities at the Deer Creek Campground and Trailhead located along Burr Trail Road in Garfield County, Utah. The project would replace old, deteriorated site amenities, improve vehicular circulation and site drainage, improve accessibility, reduce vegetation and soil trampling, prevent encroachment into an adjacent WSA, and improve the recreational experience.

The Deer Creek Campground and Trailhead Improvements Project Area is located in the Monument's Passage Zone approximately 8 miles southeast of Boulder, Utah in Garfield County and is within the Deer Creek Recreation Site which was established in 1970. The campground is approximately two acres and the trailhead is approximately 0.25 acres. The proposed action is more fully described in Environmental Assessment No. DOI-BLM-UT-0300-2015-0016-EA. This EA is available at the Grand Staircase-Escalante National Monument Headquarters office at 669 South Highway 89A in Kanab, Utah. It analyzed the Proposed Action and a No Action Alternative. The EA is incorporated by reference into this Finding of No Significant Impact (FONSI).

#### **FINDING OF NO SIGNIFICANT IMPACT**

Based upon a review of the EA and the supporting documents, I have determined that the project is not a major federal action and will not significantly affect the quality of the human environment. I considered the impacts of this action both individually and cumulatively with other actions in the general area. No environmental impacts meet the definition of significance in context or intensity as defined in 40 CFR 1508.27. The environmental impacts of this project, individually and cumulatively do not exceed those impacts described in the Grand Staircase-Escalante National Monument Management Plan/FEIS. Therefore, an environmental impact statement is not needed.

In making this finding, I considered both the context and intensity of the project as discussed below.

**Context:** The project is a site-specific action directly involving less than 3 acres of BLM administered land in a location where existing facilities are to be improved and upgraded. These facilities are utilized by visitors from across the country and beyond but the campground which has seven sites and the trailhead which accommodates up to 12 vehicles are both small and do not have international, national, regional, or state-wide importance.

**Intensity:** The following discussion is organized by the significance criteria described in 40 CFR 1508.27 and was used during my consideration of intensity.

1. The activities described in the proposed action do not include any significant beneficial or adverse impacts (40 CFR 1508.27(b)(1)). The EA includes a description of the expected environmental consequences of upgrading and improving the facilities at Deer Creek Campground and Trailhead; these impacts may be both beneficial and adverse. Where needed, design features to reduce impacts to ROW holders, recreation, a listed Threatened Plant Species, Wild and Scenic River suitable segments, Wilderness Study Areas, and visuals resources were incorporated into the Proposed Action. None of the environmental consequences discussed in detail in the EA are considered significant.
2. The activities included in the proposed action would not significantly affect public health or safety (40 CFR 1508.27(b)(2)). The proposal removes parking from a flood prone area as well as improves accessibility to the amenities in the campground.
3. The proposed activities would not significantly affect any unique characteristics (40 CFR 1508.27(b)(3)) of the geographic area such as proximity to historic or cultural resources, park lands, prime farm lands, wetlands, wilderness, wild and scenic rivers, or ecologically critical areas. The proposal does not impact park lands or prime farmlands because they are not present in the project area. The historic and cultural resources of the area have been inventoried and no cultural resource sites were found. The project area is surrounded by wilderness study areas; a wild and scenic river suitable segment runs along side it; and wetlands exist adjacent to project area. The proposal is designed to prevent impacts to these areas. Ute Ladies' Tresses (*Spiranthes diluvialis*), a listed Threatened Plant species, has been identified adjacent to the project area and those areas will be staked to prevent impacts during construction.
4. The activities described in the Proposed Action do not involve impacts on the human environment that are likely to be highly controversial (40 CFR 1508.27(b)(4)). BLM has operated and managed this campground and trailhead for decades as well as numerous others in the region. Based on that past experience, the impacts are well understood.
5. The activities described in the Proposed Action do not involve impacts that are highly uncertain or involve unique or unknown risks (40 CFR 1508.27(b)(5)). The activities described in the proposal are not unique or unusual (see Chapter 2 of the EA). The BLM has experience implementing similar projects and the analysis indicates that impacts are not highly uncertain, unique, or unknown.
6. My decision to implement these activities does not establish a precedent for future actions with significant impacts or represent a decision in principle about a future consideration (40 CFR 1508.27(b)(6)). The selected alternative can be implemented independent of any other action and does not set a precedent related to possible future actions.
7. The impacts of upgrading and improving the facilities at Deer Creek Campground and Trailhead would not be significant, individually or cumulatively, when considered with the impacts of other actions (40 CFR 1508.27(b)(7)). The EA discloses that there are no other connected or cumulative actions that would cause significant cumulative impacts. The EA also discloses that the interdisciplinary team considered the impacts in the context of past, present, and reasonably foreseeable actions and no significant cumulative impacts are predicted.
8. I have determined that the activities described in the proposed action will not adversely affect districts, sites, highways, structures, or other objects listed in or eligible for listing in the National

Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources (40 CFR 1508.27(b)). Previous inventory work and recent field inspections for this project have found no cultural resource sites.

9. The proposed activities are not likely to adversely affect any endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act (40 CFR 1508.27(b)(9)). A known population of the Ute Ladies' Tresses (*Spiranthes diluvialis*) is adjacent to the proposed project in the Deer Creek Campground. The U.S. Fish and Wildlife service has this plant species listed under the ESA as Threatened. The proposed project was designed to avoid any adverse effects to the known Utes Ladies' Tresses (*Spiranthes diluvialis*) population or its habitat by staking and flagging construction limits to prevent encroachment into habitat during construction.

10. The proposed activities will not threaten any violation of Federal, State, or local law or requirements imposed for the protection of the environment (40 CFR 1508.27(b)(10)). The Proposed Action conforms to the Monument Management Plan and is consistent with the Garfield County General Management Plan. State, local, and tribal interests were provided an opportunity to participate in the environmental analysis process.

---

Cynthia Staszak  
Monument Manager

---

Date

**United States Department of the Interior  
Bureau of Land Management**

**Environmental Assessment  
DOI-BLM-UT-0300-2015-0016-EA**

October 2015

**Deer Creek Campground and Trailhead Improvements**

***Location:*** Burr Trail Road, 8 miles southeast of Boulder, Utah  
Salt Lake Meridian, Garfield County, Utah  
Township 34 South, Range 5 East, Section 16, NE 1/4

Grand Staircase-Escalante National Monument  
669 South Highway 89A  
Kanab, UT 84741  
Phone: (435) 644 1200  
Fax: (435) 644 1250



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## **Deer Creek Campground and Trailhead Improvements**

**DOI-BLM-UT-0300-2015-0016-EA**

### **CHAPTER 1**

#### **INTRODUCTION AND NEED FOR THE PROPOSED ACTION**

##### **INTRODUCTION AND BACKGROUND**

The Bureau of Land Management (BLM) proposes to update and improve the Deer Creek Campground and Trailhead in Grand Staircase Escalante National Monument (GSENM). See Appendix A – Project Area Map for project location and area. These existing recreation facilities are located in the Monument's Passage Zone approximately 8 miles southeast of Boulder, Utah in Garfield County and are included within the Deer Creek Recreation Site which was established on Wednesday, December 23, 1970 as published in Federal Register Notice, Volume 35, No. 248. See Appendix B – Deer Creek Recreation Site and WSAs Map for location and boundaries of recreation site.

Deer Creek Campground is located on the north side of Burr Trail Road adjacent to Deer Creek and contains the following amenities and site fixtures:

- 7 campsites with tables, fire rings, grills, and site numbering posts
- A single vault toilet
- A fee station with fee tube and bulletin board
- A gravel/natural surface site road
- Post and rail fencing around the perimeter
- A cattle guard
- A few small signs

The site road for the campground is also used to access private inholdings across the creek further up the canyon.

The development of facilities at the campground was addressed in prior planning efforts and environmental assessments (EA). Those include:

- *Deer Creek Campground Fence EA (UT 030 01 011, 2002)*

BLM approved the construction of 1,122 feet of pole fencing to prevent livestock from entering Deer Creek Campground to protect facilities and prevent recreation and livestock conflicts.

- *Deer Creek Recreation Site Accessibility, Maintenance, and Rehabilitation EA (UT 048 98 030, 1998)*

BLM approved completing construction of Deer Creek Campground and continuance of routine maintenance. Work included constructing three additional campsites, replacing picnic tables,



leveling areas for tents, installing fire rings and grills, constructing accessible walkways to the toilet, installing numbered posts at campsites, and installing a fee collection box and a site sign.

Deer Creek Trailhead is located in close proximity to Deer Creek on the south side of Burr Trail Road across from the campground. It is a small, user created parking area with gravel/natural material surfacing. It currently accommodates approximately five to seven automobiles plus two trucks with stock trailers if all are parked in an organized manner to efficiently use the space. A trailhead register and small signs are installed on the edge of the site where user created trails lead down canyon.

Maintenance of the trailhead was addressed in the following planning and compliance document:

- *GSENM Trail/Trailhead Maintenance/Restoration EA (UT 048 98 015, 1998)*

BLM approved the maintenance and restoration of existing trailheads in GSENM, including Deer Creek Trailhead. Work at the Deer Creek Trailhead was focused on resource protection and included installation of rock barriers to protect riparian vegetation and signage to prevent vehicle encroachment into the adjacent Wilderness Study Area (WSA).

BLM has secured deferred maintenance funds to complete the proposed campground improvements and recreation site user fees will be used to improve the trailhead. If approved, the proposed recreation site improvements could be implemented as soon as Fall 2015.

#### **PURPOSE AND NEED FOR THE PROPOSED ACTION**

The purpose of the proposed action is to replace old, deteriorated site amenities, improve vehicular circulation and site drainage, improve accessibility, reduce vegetation and soil trampling, prevent encroachment into an adjacent WSA, and improve the recreational experience.

At Deer Creek Campground the facilities are deteriorating; none of them meet the Architectural Barriers Act Accessibility Guidelines for Outdoor Developed Areas; the site road and some campsites do not drain water well; and vegetation and soils are being trampled because of disorganized and insufficient vehicular circulation and parking. Both issues also diminish the quality of the recreational experience for campground users.

The vault toilet in the campground does not meet accessibility standards and has settled to the degree that opening and closing the door is difficult. The concrete path that leads to the toilet begins in the parking area for the adjacent campsite and is often blocked by parked vehicles. Only one of the campsites has a picnic table that is designed to meet accessibility standards and that picnic table sits on a concrete pad that prevents it from being used by someone in a wheelchair. None of the fire rings in the campground meet accessibility standards. One of the campsites does not have enough space for a tent. Another campsite is accessed by parking on the opposite side of the site road and climbing up slope over tree roots. At another campsite the parking area and the camping unit are separated by a soggy depression. The site road averages 12 feet wide forcing motorists to encroach on vegetation or use campsite parking spaces to allow passage.

At Deer Creek Trailhead the disturbed area currently used for parking extends from the edge of Burr Trail Road into an abandoned section of the old Burr Trail Road alignment. It is surrounded on all sides – on the east by Deer Creek, on the west by a steep bank, on the north by Burr Trail Road and

a steep grade change, and on the south by vegetation and the WSA. Vehicles often park in a disorganized fashion and reduce the already limited parking capacity of the site. The parking area is in soft sand and drainage from along the edge of Burr Trail Road floods across the parking area during storm events, periodically depositing more sand. The native and regularly deposited sand in the parking area makes for an unstable parking surface. Incremental encroachment towards the WSA occurs as the perimeter boulders are either shifted or covered with sand. Social trailing from all points around the southern edge of the parking area occurs as users head down canyon, trampling vegetation and soils.

#### **CONFORMANCE WITH BLM LAND USE PLAN**

The proposed action is in conformance with the *Grand Staircase Escalante National Monument Management Plan* (MMP), effective February 2000, and is supported by the following plan decisions:

**FAC 11** *The condition of routes and distance from communities in the Passage Zone makes it a secondary zone for visitation. Similar facilities as allowed in the Frontcountry Zone could be provided for resource protection, visitor safety, or for the interpretation of Monument resources. Information kiosks approximately the size of two 3 foot by 5 foot panels will be located at major trailheads (e.g., The Gulch, Deer Creek, and Dry Fork), and smaller kiosks or signs will be located at less used trailheads.*

**FAC 12** *Existing parking areas may be better delineated with barriers to prevent further expansion. Parking areas could accommodate up to 30 vehicles, but most will be designed for fewer than 10 cars. Construction of small spur routes or trails may be allowed to access parking areas or other facilities. Trails and parking areas will not be paved.*

**FAC 15** *The existing Deer Creek Campground will be the only developed campground in this (Passage) zone.*

The project area is in the Passage Zone where facilities are allowed for safety, interpretation, and the protection of Monument resources.

#### **RELATIONSHIPS TO STATUTES, REGULATIONS, AND OTHER PLANS**

The proposed action complies with federal environmental laws and regulations, Executive Orders, and Department of Interior, BLM, and GSENM policies and is consistent with state laws and local and county ordinances and plans, including the following:

##### *Omnibus Public Land Management Act of 2009*

The Omnibus Public Land Management Act established the National Landscape Conservation System (NLCS) in order to conserve, protect, and restore nationally significant landscapes that have outstanding cultural, ecological, and scientific values for the benefit of current and future generations. The Act goes on to require that NLCS units, of which GSENM is one, be managed in a manner that protects the values for which the components of the system were designated. The NLCS includes National Monuments, Wilderness Study Areas, and Wild and Scenic Rivers. The proposal was designed to meet the objectives of OPLMA.

*Federal Lands Policy and Management Act of 1976*

The Federal Land Policy and Management Act (FLPMA) (43 U.S.C. 1701 1712) directs the development of land use plans for BLM lands. Once land use plans are developed, any approved project must be provided in the land use plan or be consistent with the terms, conditions, and decisions in the approved land use plan. As noted above, this project conforms to the land use plan.

*Endangered Species Act of 1973*

The Endangered Species Act (ESA) provides for conserving endangered and threatened species of plants and animals. It requires that federal agencies consult with the U.S. Fish and Wildlife Service to ensure that any actions that they authorize, fund, or carry out are not likely to jeopardize the continued survival of a listed species or result in the adverse modification or destruction of its critical habitat. This proposal was designed to avoid impacts to species listed under ESA.

*National Historic Preservation Act of 1966*

The National Preservation Act requires federal agencies to take into account the effect of any undertaking on historic resources and to provide the Advisory Council on Historic Preservation a reasonable opportunity to comment on the undertaking. Federal agencies must determine whether the undertaking is a type of activity that could affect historic properties. Historic properties are ones that are included on the National Register of Historic Places or that meet the criteria for inclusion on the National Register. If the agency determines that it has no undertaking, or that its undertaking is a type of activity that has no potential to affect historic properties, the agency has no further Section 106 obligations.

*Grand Staircase-Escalante National Monument Proclamation (1996)*

The Proposed Action and No Action Alternative have been evaluated for consistency with the Proclamation, particularly in reference to the specific objects that were identified within the Proclamation. No effects of the proposed action, with the included design features, are anticipated on any of objects identified within the Proclamation.

*BLM Manual 6220 National Monuments, National Conservation Areas, and Similar Designations (2012)*

*The BLM will inventory existing facilities within Monuments and NCAs and determine whether to remove, maintain, restore, enhance, or allow natural disintegration of each facility* (p. 1 10). Deer Creek Campground is listed in the GSENM Management Plan as “the only developed campground” in the Passage Zone. The proposed action will maintain this existing facility.

*BLM Manual 6330 Management of BLM Wilderness Study Areas (2012)*

BLM is guided to manage WSAs in a manner that does not impair their suitability for designation as wilderness as directed by *BLM Manual 6330 Management of BLM Wilderness Study Areas*. No effects of the proposed action are anticipated to impair the suitability of the adjacent WSAs for designation.

*BLM Manual 6400 Wild and Scenic Rivers Policy and Program Direction for Identification, Evaluation, Planning and Management (2012)*

BLM is guided to manage any inventoried eligible Wild and Scenic River segments to maintain their suitability and tentative classifications until designated or released in a subsequent land use plan. Interim project activities on Wild and Scenic River (WSR) eligible segments are guided by *BLM Manual 6400 Wild and Scenic Rivers Policy and Program Direction for Identification, Evaluation,*

*Planning and Management (2012).* No effects of the proposed action are anticipated to affect the suitability of the WSR segments of Deer Creek for designation.

*Garfield County General Management Plan (1998, updated 2010)*

Although Deer Creek Campground and Trailhead are not specifically mentioned in the Garfield County General Plan, a review of the document suggests that this proposal would not conflict with the county plan. The county plan does note support for recreation opportunities and facilities on page 5 3:

- *Planning Assumption:* Therefore, in an effort to strengthen its economic base, the county desires to increase its revenue opportunities through enhancing county recreational opportunities and developing destination related activities.
- *Policy Statements:* Garfield County supports creating new attractions and recreational facilities within the county.

#### **IDENTIFICATION OF ISSUES**

During preparation of the EA, the public was notified of the proposed action by posting on the BLM National Environmental Policy Act (NEPA) Register on May 9, 2015. No individuals or groups contacted the BLM in response to that notice. During the interdisciplinary review the following issues were identified:

Issue A: Recreation How would the proposed upgrades and improvements at Deer Creek Campground and Trailhead affect the recreation experience?

Issue B: Lands and Realty How would the proposed upgrades and improvements affect the ability of Right of Way (ROW) holders to access private property?

Issue C: Wilderness Study Areas How would the proposed upgrades and improvements at Deer Creek Campground and Trailhead affect WSAs?

Issue D: Wild and Scenic River Suitable Segments How would the proposed upgrades and improvements at Deer Creek Campground and Trailhead affect the Wild and Scenic River Suitable segments?

Issue E: Visual Resources – Would the proposed site developments create visually contrasting impacts that alter the landscape character?

Issue F: Threatened and Endangered Plant Species How would the upgrades and improvements at Deer Creek Campground and Trailhead affect Ute Ladies' Tresses (*Spiranthes diluvialis*) a species listed under ESA?

Issue G: Floodplains – How would the upgrades and improvements at Deer Creek Campground and Trailhead affect the floodplain of Deer Creek?

#### **SUMMARY**

This chapter has presented the purpose and need of the proposed project, as well as the relevant issues, i.e., those elements of the human environment that could be affected by the implementation of the proposed project. In order to meet the purpose and need of the proposed project in a way that resolves the issues, the BLM has considered and/or developed a range of action alternatives. These alternatives are presented in Chapter 2. The potential environmental impacts or consequences resulting from the implementation of each alternative considered in detail are analyzed in Chapter 4 for each of the identified issues.

## CHAPTER 2

### DESCRIPTION OF ALTERNATIVES

#### INTRODUCTION

This Environmental Assessment reviews a No Action Alternative and the Proposed Action. The No Action Alternative provides a baseline for comparison of the impacts of the Proposed Action.

#### PROPOSED ACTION

BLM is proposing to upgrade and improve the Deer Creek Campground and Trailhead. GSENM would use BLM deferred maintenance and recreation site user fees to pay for the proposed improvements. Contractor, BLM force account or maintenance staff, and/or volunteer labor could be used to perform the work. The campground is approximately 2 acres and the trailhead is approximately 0.25 acres. Construction is slated to occur in late October/early November 2015 and should be completed in 4 weeks or less.

The proposed action (See Appendix C – Site Design) includes the following:

#### *Campground*

- Replace the vault toilet
- Construct a parking space adjacent to toilet
- Remove concrete walkway to toilet
- Construct new accessible walkway to toilet
- Reorganize fee station area including parking, new information/interpretive kiosk, and fee station
- Reorient parking for all campsites from parallel to 90 degrees orientation
- Split the first campsite on the left into two (use parking from one and camping area of the other)
- Abandon the last campsite on the left which has no place to pitch a tent
- Install base material to raise, define, and improve surface stability of campsites
- Replace campsite numbering posts
- Remove picnic tables and concrete pads
- Install new picnic tables
- Remove all grills and fire rings
- Install new fire rings
- Install tent pads at all sites
- Install new NLCS standard site sign on masonry base and other site signs as needed
- Widen site road to up to 15 feet wide and install gravel/road base on it to improve drainage
- Install two culverts under site road to improve drainage
- Raise cattle guard
- Designate a vehicle turnaround area on the north end of the campground that is not to be used for parking

The proposed parking improvements at the campground would limit each campsite to one vehicle 20 feet or less in length. Signs would be installed to educate visitors about space limitations and lack of turnaround for oversized vehicles. Owners of vehicles parked along the road or in the turnaround would be notified of the need for access along road. Egregious violations or failure to comply could result in additional actions taken such as towing the vehicle.

#### *Trailhead*

- Upgrade parking area using gravel/road base to stabilize the surface and accommodate up to 11 standard size automobiles and one vehicle pulling a trailer
- Install barriers (fencing and/or boulders) to define edges of parking area and protect vegetation
- Remove register box and install new one
- Install information/interpretive kiosk
- Install NLCS standard site sign, "No Camping" signs, and other needed signs on posts
- Overnight camping would not be allowed at the trailhead.

The trailhead parking surface would be stabilized and the area would be defined by barriers to reduce its expansion. The barriers would also direct hikers and equestrian users toward the desired hiking route reducing multiple braided trails departing from the trailhead. Fencing would be installed during initial construction but should it prove to be unmaintainable, BLM will remove it and install additional boulders. Improvements to the trailhead would aid BLM in keeping vehicles within the parking area.

#### *Applicable to Both Campground and Trailhead*

Once construction begins on either the campground or trailhead, the sites would individually be closed to the public until construction is completed. A variety of heavy, motorized equipment would be used during construction, including but not limited to a dump truck, crane, front end loader, skid steer loader, and tractor. Work would be done during the daylight hours (7 am to 6 pm). Throughout construction, equipment would be parked at the project site but not on the site road. It is anticipated the project would take no more than 4 weeks to complete. General maintenance would be performed at the proposed facilities once construction was completed.

*BLM's Guidelines for a Quality Environment* was used to plan and design this project, seeking to meet the agency's goals of developing facilities that are sustainable, functional, accessible, cost effective, and responsive to place and setting. *Accessibility Guidelines for Outdoor Developed Areas* (Architectural and Transportation Barriers Compliance Board, 2013) was also used to plan and design this project to ensure that these facilities are readily accessible to and usable by individuals with disabilities. A sign plan would be developed to comprehensively address installation of signs at the campground and trailhead.

Design criteria to meet built environment image guidelines and other mandates would include the following:

- Natural or natural appearing materials would be used. These could include concrete, natural stone, road base, gravels or fines, rusted or painted metal, and/or wood.
- No shiny, reflective materials would be used.

- Natural palette colors would include blacks, grays, reds, rusts, browns, and buffs. No bright colors such as whites or yellows would be used (except for lettering on signs).
- Where practical, native plants that need to be removed during construction would be replanted in areas where re vegetation is needed. Otherwise, native plant container stock and/or native plant seeds would be used to re vegetate areas impacted during construction.

In order to prevent unnecessary resource impacts, the following design features would be required and incorporated into project construction, scheduling and monitoring:

- Construction limits would be staked and flagged to prevent encroachment into Ute Ladies' Tresses (*Spiranthes diluvialis*) habitat and to protect other vegetation and soils during construction.
- To prevent the spread of invasive and noxious weeds, the equipment used would be washed before transport to the project site.
- The project site would be monitored for noxious and invasive vegetation after construction. If noxious weeds or non native, invasive plants are discovered, BLM approved weed treatments would be applied in a manner consistent with current BLM practice.
- All construction would take place outside of the migratory bird breeding and brood raising period from April 15 to July 15.

To inform the public of the construction closures, BLM would do the following:

- Issue a press release to relevant media outlets.
- Publish notice on GSENM website.
- Post closure signs in the local communities at businesses and community bulletin boards.
- Work with the Garfield County Office of Tourism to do outreach to visitors.

To coordinate with and minimize construction impacts on ROW holders, BLM would do the following:

- Provide advanced notice about and coordinate construction scheduling.
- Limit wait times to an average of 15 minutes or less but no longer than 30 minutes during construction, with the exception of the days when the vault toilet is being installed or the cattle guard is being adjusted, which could take longer.
- Establish a parking area for ROW holders to use when passing through the site is not necessary.

#### **No ACTION**

Under the No Action Alternative, BLM would not improve and update the Deer Creek Campground or Trailhead. The BLM would not provide any of the improvements or facilities proposed in the Action Alternative. Under this alternative the outdated vault toilet would continue to be used by the public; vehicular circulation would continue to be disorganized and congested; accessibility would not be improved; impacts to soils and vegetation would continue; and incremental encroachment toward the WSA would not be additionally restricted.



## **CHAPTER 3**

### **AFFECTED ENVIRONMENT**

#### **INTRODUCTION AND GENERAL SETTING**

The affected environment was considered and analyzed by an interdisciplinary team as documented in the Interdisciplinary Team Checklist (See Appendix D – IDT Checklist). The checklist indicates which resources are either not present in the project area or would not be impacted to a degree that requires detailed analysis. Resources which are predicted to be impacted are described in Chapter 3 and impacts on these resources are analyzed in Chapter 4. Recreation, Lands and Realty, Wilderness Study Areas, Wild and Scenic Rivers, Visual Resources, and Threatened and Endangered Plant Species were identified by the Interdisciplinary Team as potentially affected by the Proposed Action.

Deer Creek Campground and Trailhead are located along the Burr Trail Road and adjacent to Deer Creek, a tributary of the Escalante River. The project area is 5,700 feet above sea level and is located within Deer Creek Canyon. It is within the Escalante Canyons physiographic region which is typified by colorful sandstone canyons carved by desert creeks and rivers and slickrock expanses dotted with ponderosa pine and pinyon and juniper trees. The creeks and rivers here are lined with cottonwood trees, willows, and river birch. Both the campground and trailhead sites are constrained by the roads, the creek and flood plain, and sandstone outcrops.

Construction of Deer Creek Campground began in the 1980s when four of seven planned campsites were constructed. The additional sites were constructed after GSENM was designated in the late 1990s. Deer Creek Trailhead was formally established in 1998.

#### **Resource A: Recreation**

Deer Creek Recreation Site was designated in December 1970 under the authority of the Multiple Use Act of 1964. Deer Creek Campground was built along an existing road that accesses private in holdings and an access road right of way (ROW) was granted in 1984 that begins on the north end of the campground. Improvements to the campground have been made incrementally over the years. This small, seven site campground is one of only three developed campgrounds in GSENM and one of two in the Escalante Canyons region. During 2014, GSENM recorded 2,510 visits equating to 5,104 visitor days in the campground. The busiest months for visitation averaged over the past 5 years are May, June, September and October.

The narrow, single lane campground road is capped with gravel and vehicle parking spaces were created by use patterns rather than by formal design. In more recent years, travel trailers and recreational vehicles (RVs) have become more common although the campground and parking areas were not sized for these vehicles. To accommodate these larger vehicles, vegetation and soils have incrementally been damaged to expand the parking footprints. These larger vehicles have also created congestion along the roadway as identified by BLM, ROW holders, and the general public.

Deer Creek Trailhead is minimally developed with a trail register and two small regulation signs. The parking area is a barren core of approximately one quarter acre comprised of mostly compacted native sand. It can currently accommodate approximately five to seven automobiles plus two trucks

with stock trailers if all are parked in an organized manner to efficiently use the space. The trailhead parking area is used throughout the year by hiking, backpacking, and equestrian users. An established foot trail as well as several braided, user created routes leave the parking area along the southern edge. BLM recorded 460 visits accounting for 1,454 visitor days as the 5 year averages at this trailhead.

#### **Resource B: Lands and Realty**

The Deer Creek Campground site road abuts an established Title V ROW granting access to private property inholdings. The ROW (UTU 054541) was originally issued in 1984. The road pre dates the development of the campground although the ROW was established during the same time as the development of the campground. The ROW grant begins on the north end of the campground, is 24 foot ROW wide, and totals 2,650 feet of road length.

Deer Creek Trailhead is immediately adjacent to Burr Trail Road which was adjudicated to Garfield County under R S. 2477 in 1989. A review of the case file for UTU 066242 does not reference or establish a ROW width; however the *Burr Trail Paving EA* (UT 040 89 6, 1989) identifies a surface travel width of 24 feet.

#### **Resource C: Wilderness Study Areas**

The project area is adjacent to two WSAs (See Appendix B – Deer Creek Recreation Site and WSAs Map). Deer Creek Recreation Site is directly adjacent to the boundaries of Steep Creek WSA which encircles the campground, as well as private inholdings, on the northern side of Burr Trail Road. Deer Creek Trailhead provides access into North Escalante Canyons The Gulch Instant Study Area (ISA) which is also a WSA. The North Escalante Canyons The Gulch ISA encompasses 120,204 acres and is characterized by spectacular plateaus, benches and canyons and is bisected by the deep winding corridor of the Escalante River and its tributaries, including Deer Creek. Steep Creek WSA encompasses 21,896 acres and is noted for five south trending canyons with many scenic sandstone features.

As guided by the Wilderness Act, both WSAs were inventoried and identified as having the following wilderness characteristics: Untrammeled, Natural, Undeveloped, Solitude, and Primitive and Unconfined Recreation. Both WSAs were studied under Section 603 of FLPMA and included in the *BLM Statewide Wilderness Environmental Impact Statement (EIS)* (1990).

Previous work on the Deer Creek Trailhead was analyzed as part of a *GSENM Trail/Trailhead Maintenance/Restoration EA* (UT 048 98 015, 1998). At that time BLM determined that the trailhead was located in the historic alignment of the Burr Trail Road on the edge of the WSA. Trailhead work approved in that analysis created a better defined parking area using native materials to prevent vehicle ingress into the WSA and protect riparian vegetation.

#### **Resource D: Wild and Scenic River**

Both segments of Lower Deer Creek in the vicinity of this project were inventoried and recommended as suitable for inclusion in the National Wild and Scenic Rivers System (NWSRS) as required by Section 5(d) (1) of the Wild and Scenic Rivers Act. The study and suitability recommendation were analyzed as part of the MMP/EIS. The Lower Deer Creek 1 segment runs

along the western edge of Deer Creek Campground and is tentatively classified as *Recreational*. The Lower Deer Creek 2 segment runs adjacent to the Deer Creek Trailhead and is tentatively classified as *Wild*. These segments were recommended as worthy additions to the NWSRS and include the following identified outstanding remarkable values (ORVs): Scenic, Recreational, Geological, Riparian, and Historic.

#### **Resource E: Visual Resources**

##### *Characteristic Landscape*

The proposed project area is located in the northeastern portion of the Escalante Canyons physiographic province along Burr Trail Road and Deer Creek in Deer Creek Canyon. The dominant vegetation is riparian vegetation (cottonwood trees, river birch, and willows) growing along the creek. Other vegetation in the project area on the uplands are desert shrubs, grasses and pinyon and juniper trees. The vegetation is a full range of greens, from light sage green to dark juniper green to bright cottonwood leaves green, and ranges from medium to coarse in texture. The built elements in this landscape include the paved road, a gravel road, a vault toilet, pole fencing, a kiosk, picnic tables, fire rings, and a few signs. Since most of the built elements are screened from view by the riparian vegetation, the paved road is the primary element that draws attention.

The project area is within an enclosed landscape created by the sandstone landforms that surround it. The predominant lines are rounded and horizontal created by landform edges. The road and riparian vegetation add distinct curving bands through the landscape. The predominant colors of this landscape are salmons, greens, buffs, and grays due to the landform and vegetation. The texture of the landscape varies from medium due to the upland vegetation and landform to coarse due to the sandstone outcrops and the riparian vegetation.

This project is proposed in a classic Southern Utah, canyon country landscape with exposed red and white sandstone, sand dunes, and desert vegetation similar to other areas within the Colorado Plateau.

Burr Trail Road, the campground and the trailhead are used primarily by recreationists, cattle permittees, and private property owners. Those using the area for recreation are typically engaged in scenic touring, car camping, hiking, backpacking, horseback riding, biking, and photography. This range of individuals defines the casual observer.

##### *Visual Resource Management Classes and Objectives*

The proposed Deer Creek Campground and Trailhead Improvements project area is located in Visual Resource Management (VRM) Class II. The objective for VRM Class II is to retain the existing character of the landscape. The level of change to the characteristic landscape should be low. Management activities may be seen, but should not attract the attention of the casual observer. Any changes must repeat the basic elements found in the predominant natural features of the characteristic landscape.

#### **Resource F: Threatened and Endangered Plant Species**

Adjacent to the proposed project in the Deer Creek Campground is a known population of the Ute Ladies' Tresses (*Spiranthes diluvialis*). The U.S. Fish and Wildlife service has this plant species listed

under the ESA as Threatened. Ute Ladies' Tresses populations fluctuate widely in numbers of individuals visible on a year to year basis.

**Resource G: Floodplains**

The campground is built mostly on a structural bench, although the entrance and edges closest to the stream are on alluvium. The toilet and all but parts of three campsites are located on the bench (above the floodplain). The soil survey shows the bench as soil map unit 5086 (Mespun Bispen Santrick complex, 2 to 15 percent slopes). These soils are composed of aeolian sand (not alluvial) and are excessively drained. The entrance and edges are mapped as soil map unit 5088 (Calcree Bowington Mespun complex, 0 to 20 percent slopes). These soils are probably either Calcree or Bowington or a mix, both of which are alluvium (the difference is that Calcree is poorly drained while Bowington is moderately well drained: both profiles are fine sand throughout, but Bowington is much deeper).

The floodplain mapping for Garfield County (FEMA Flood Insurance Rate Maps FIRM) does not include Deer Creek. There was formerly a stream gauge on Deer Creek near the Burr Trail crossing. USGS reports annual peak stage and discharge from 1959 1974 and 2002 2007, and mean daily discharge from Sept 2001 May 2007 ([http://nwis.waterdata.usgs.gov/nwis/dv?site\\_no=09338900](http://nwis.waterdata.usgs.gov/nwis/dv?site_no=09338900)). These data alone are insufficient to accurately estimate flood return intervals. Regardless, certainly some areas within the campground are subject to flooding at least some of the time.

## CHAPTER 4

### ENVIRONMENTAL IMPACTS

#### PROPOSED ACTION

This section analyzes the impacts of the proposed action to those resources described in the Affected Environment, Chapter 3, above.

#### Resource A: Recreation

##### *Campground Effects*

Implementing deferred maintenance at Deer Creek Campground would have direct benefits to the recreating public. The general public would benefit in having new, updated, and more accessible sites in the campground. A new toilet, tables, fire rings, and tent pads would be installed and a single parking space would be provided at each site. These improvements would reduce resource impacts by directing uses to specific areas in the campground. Removing the existing site with no tent pad and relocating the parking for the last site on the right out of the flood prone area would improve the functionality and safety of using the campground.

One of the goals of the redesign of the campground is to minimize and/or alleviate the issues associated with traffic flow, congestion (especially for those using the ROW to access private property), and vegetation and soil displacement by larger and more vehicles attempting to fit into a campground that does not physically accommodate them. Larger vehicles and multiple vehicles cramming into single sites have made it difficult if not impossible at times for vehicles to pass through the campground on the site road. Actions proposed to address these problems include slightly increasing the width of the road, limiting use of each campsite to one vehicle, and providing a perpendicular parking stall in each campsite for one vehicle.

The redesigned parking spaces would provide better parking delineation and reduce trampling of vegetation and soils. They would also provide space for the public to park completely off the edges of the site road but would not accommodate vehicles over 20 feet in length. The campground was never designed to accommodate oversize vehicles and does not have the physical space to allow for expanding the existing footprint to accommodate these types of vehicles. Oversize vehicles would continue to be diverted to other locations outside of Deer Creek Campground, whether in RV parks in nearby communities, in developed campgrounds operated by both federal and state agencies, or in primitive campsites on public lands in the area. The scale of the proposed campground improvements is not anticipated to significantly contribute to increasing the level of dispersed primitive camping in the area. The current congestion and configuration of the campground is already causing oversize vehicles and oversize groups to camp elsewhere. Another benefit of limiting campsite use to one vehicle is that large groups would not cram into sites exceeding capacity by two or three times and creating conflicts with other users (noise, crowding, etc.).

##### *Trailhead Effects*

The goal of the redesign of the trailhead, (including the perimeter fencing) is to organize the parking area so it is more efficient and does not continue to expand, as well as to direct hiking and equestrian traffic unto the existing route to minimize social trailing and the associated soil and

vegetation trampling. The trailhead currently accommodates five to seven standard size vehicles and two trucks pulling stock trailers if all parties park for maximum efficiency. Vehicles are commonly parked haphazardly and at times perpendicular to each other reducing the capacity of the site. The redesigned trailhead would accommodate up to 11 standard size vehicles and one truck pulling a stock trailer. Numerous social trails leave from all edges of the parking area headed down canyon. Fencing physically and psychologically provides an edge that most users recognize and can organize themselves next to. Edging the parking area with boulders would not provide a similar edge and does not prevent social trailing.

The proposed parking improvements at the trailhead would slightly increase the number of standard size vehicle spaces while reducing the number of spaces for vehicles pulling trailers from two to one. The physical (Burr Trail Road, surrounding steep banks, Deer Creek) and administrative (WSA) constraints of the site do not allow for expanding the site to provide parking for additional oversize vehicles.

The natural drainage as well as additional drainage created by Burr Trail Road goes across the trailhead parking area. The drainage is currently and would continue to be diverted toward the road and away from the parking area to the degree it is possible. Sand would continue to be deposited on the parking area during flood events. It is not feasible to construct a drainage ditch around the parking area that would prevent this from occurring due to physical (rock outcrops) and administrative constraints (WSA boundary). Elevating the parking surface slightly by installing several inches of road base will provide a more stable surface to address vehicles getting stuck in deep sand.

#### *Short and Long Term Effects for Both Campground and Trailhead*

Short term effects for both sites would include displacement of the public during construction. The construction is proposed for mid October into early November when visitation is transitioning from high to low season.

Long term effects include improved facilities making the public's stay more enjoyable. Impacts to vegetation and soils would be reduced with new site designs directing or containing uses to specific areas within the sites.

#### **Resource B: Lands and Realty**

The Deer Creek Campground site road abuts an established Title V ROW granting access to private property inholdings and is used by both campers and the ROW holders and their visitors. The campground improvements would not affect the ROW grant. Benefits to the ROW holders would include reduced congestion along the road due to providing a single, 90 degree parking space within each campsite so that oversize and additional vehicles are not parked parallel to and partially in the travel lane.

Short term effects would include limited access for ROW holders during construction. BLM would communicate construction schedules and coordinate with ROW holders. BLM would also park equipment off the site road when not in use to maintain access.

#### **Resource C: Wilderness Study Areas**

The deferred maintenance activities at Deer Creek Campground do not occur within the boundaries of either WSA. Implementing the proposed work at Deer Creek Campground would have no direct or indirect impact on the adjacent Steep Creek WSA or North Escalante Canyons The Gulch ISA.

The parking area improvements at the Deer Creek Trailhead would have potential to impact the North Escalante Canyons The Gulch ISA. The project design features would prioritize a natural setting and reduce the size of the current disturbed footprint. The design features and criteria include the use of natural or natural appearing materials, establishment of construction limits, protection of the existing island of vegetation that is currently overrun by vehicles, and pulling the parking back from the riparian edge. These would all serve to benefit the natural setting adjacent to the WSA. Installing barriers would prevent vehicle ingress into the WSA. Installing barriers would also direct visitors to the established trail and reduce the braided, user created routes thus improving the natural character of the WSA adjacent to the trailhead.

#### **Resource D: Wild and Scenic River**

The proposed action would not increase development beyond the existing footprint of the campground and would slightly reduce the footprint of the existing trailhead parking area. There is no threat to the wild and free flowing nature of either WSR suitable tributary or threat to identified outstanding remarkable values (ORVs). Implementation of the project features in the campground such as improving site drainage, closing off one creek side camp site, reducing the potential for vehicle congestion, and protecting riparian vegetation all serve to maintain the suitability of Lower Deer Creek Segment 1 (tentatively classified *Recreational* section). Lower Deer Creek 2 segment (tentatively classified *Wild* section) begins adjacent to the Deer Creek Trailhead and would benefit from the trailhead redesign which would protect riparian vegetation, one of the ORVs. Implementation of the proposed action including design features and criteria would protect vegetation and help restore the riparian edge in this location.

#### **Resource E: Visual Resources**

BLM's Visual Resource Management program includes a standardized system to review lands actions for resource management plan conformance. Visual contrast rating worksheets are completed to determine if a project conforms to the resource management plan.

In order to evaluate the environmental consequences of the Proposed Action, a linear key observation point (KOP) was established along Burr Trail Road as part of completing the contrast rating analysis. Along most of the linear KOP the project elements would be screened from view by landform and vegetation. When the casual observer is immediately adjacent to the campground entrance, the signs, fencing, and cattle guard would be visible, and when passing by the trailhead all its features and any parked vehicles would also be in view. The length of time the few visible project elements are in view is less than 30 seconds for those travelling along the road.

During construction, temporary visual impacts could result from the visibility of construction equipment and site work. Post construction, the negligible contrast created by the site improvements would be similar to what currently exists.

The proposed improvements would be sited in locations currently developed for the same purposes. The campground and trailhead are located in the floor of a narrow riparian canyon with thick

vegetation and are screened from view by vegetation and landforms. The toilet and other fixtures would be constructed of materials that blend with the natural environment minimizing the color and textural contrast they would create. By constructing the project according to the outlined design criteria and implementation measures, the negligible changes to the existing character of the landscape would be appropriate to meet the visual resource management objectives of the area.

#### **Resource F: Threatened and Endangered Plant Species**

BLM manages threatened and endangered species under the Endangered Species Act. Consultation with the U.S. Fish and Wildlife Service is required if the species or habitat will be impacted. Ute Ladies' Tresses has a recovery plan which guides management decisions and mitigates any impacts to the species.

The proposed project was designed to avoid any adverse effects to the known Ute Ladies' Tresses (*Spiranthes diluvialis*) population or its habitat. Habitat for this species would be avoided.

#### **Resource G: Floodplains**

Given the topography and the soils, there is certainly flood risk near the entrance and exit (to private property) and on the edges closest to the stream, less so on the bench. The site road through the campground enters the stream at the northern end of the campground, providing a high flow channel into the campground; this likely increases flood risk. The natural levee at that point has been eroded, probably from both traffic and high flows.

The redesign of the campground relocated overnight parking for Site #7 out of the area prone to flooding and designated it as turnaround only with no parking allowed. BLM's sign plan for the campground would educate users regarding flood risk. As designed the project would not result in any net change in floodplain impacts and would not alter flood risk.

While it would be possible to abandon the campground to eliminate flood risk entirely, that seems unwarranted at this time.

#### **No Action**

##### **Resource A: Recreation**

In the No Action Alternative the general public would not see any changes in the campground. No deferred maintenance would be implemented thereby all current facilities would remain the same. Resource and visitor impacts (i.e. vegetation and soil trampling, erosion, and roadway congestion) would continue.

The trailhead parking would also remain the same. The parking area would remain undefined and the parking surface would not be improved. No delineating barriers would be installed in the parking area to reduce vegetation and soil trampling.

Deleted: 1

##### **Resource B: Lands and Realty**



In the No Action Alternative the ROW holders would not see any changes in the campground. No deferred maintenance would be implemented thereby occasional roadway congestion would continue during busy times. Impacts would be expected to remain the same.

**Resource C: Wilderness Study Areas**

In the No Action Alternative, there would continue to be the potential for further vehicle ingress at the Deer Creek Trailhead and trampling of native vegetation lying on the boundary of the WSA. Impacts would remain the same. Although potential exists for further ingress on the boundary, current conditions are not expected to threaten long term suitability.

**Resource D: Wild and Scenic Rivers**

In the No Action Alternative impacts would remain the same and the opportunity to improve riparian vegetation along the segment would be lost. Current conditions are not expected to threaten long term suitability.

**Resource E: Visual Resources**

In the No Action Alternative the impacts to visual resources would remain the same.

**Resource F: Threatened and Endangered Plant Species**

In the No Action Alternative the Ute Ladies' Tresses (*Spiranthes diluvialis*) population is expected to continue to fluctuate on an annual basis.

**Resource G: Floodplains**

In the No Action Alternative the impacts associated with the floodplain of Deer Creek would remain the same. Parking for Site #7 would remain in a location of periodic flooding.

**CUMULATIVE IMPACTS**

Cumulative impacts are those impacts resulting from the incremental impact of an action when added to other past, present, or reasonably foreseeable actions regardless of what agency or person undertakes such other actions.

**Resource A: Recreation**

BLM has not identified any cumulative impacts for recreation. The campground and trailhead have existed for decades and the disturbed footprints would remain the same while the layouts would be slightly altered.

**Resource B: Lands and Realty**

BLM has not identified any cumulative effects related to lands and realty actions with this project.

#### **Resource C: Wilderness Study Areas**

There are no known cumulative impacts to WSAs.

#### **Resource D: Wild and Scenic River**

There are no known cumulative impacts to Wild and Scenic River suitable segments.

#### **Resource E: Visual Resources**

##### *Cumulative Impact Area (CIA)*

Visual Resources The cumulative impact area of analysis for Visual Resources is the viewshed along Burr Trail Road.

##### *Cumulative Impact Analysis*

The cumulative impacts to visual resources from past, present, and reasonably foreseeable actions include recreational facilities (trailheads, day use areas, etc.), general recreational use, private property development, road construction and maintenance activities, and livestock grazing management facilities (corrals, fences, water developments, storage buildings, etc.). The action alternative would make improvements to existing facilities using elements that would blend with the landscape and be largely screened from view. Additionally, the paved portion of the Burr Trail Road through GSENM runs for more than 30 miles through a viewshed that encompasses a landscape of 100,000s of acres. These facilities are visible only when in immediate proximity to the site and are small in scale within this grand scale landscape. They would not contribute to an increase in impacts to visual resources in the area.

#### **Resource F: Threatened and Endangered Plant Species**

There are no known cumulative impacts to Ute Ladies' Tresses (*Spiranthes diluvialis*).

#### **Resource G: Floodplains**

The cumulative impacts associated with the floodplain from past, present, and reasonably foreseeable actions include the development of the campground and trailhead and the construction and continued use of the driveway access to private property. The action alternative would make improvements to existing facilities in the campground and at the trailhead. Erosion associated with use of the driveway access would continue but to the degree that it cumulatively increases floodplain impacts is unknown.

## CHAPTER 5

### CONSULTATION AND COORDINATION

#### INTRODUCTION

The issue identification section of Chapter 1 identifies those issues analyzed in detail in Chapter 4. The IDT Checklist (See Appendix D.) provides the rationale for issues that were considered but not analyzed further. Issues were identified through the public and agency involvement process described below.

**Table 5.1. List of Persons, Agencies, and Organizations Consulted**

Name	Purpose & Authorities for Consultation or Coordination	Findings & Conclusions
Craig Sorenson	Retired GSENM Outdoor Recreation Planner	Provided background on trailhead location, WSA boundary, and prior trailhead EA.
Sue Fearon	ROW holder, private property owner	Provided a background perspective of long term use and public attachment to the campground.

#### SUMMARY OF PUBLIC PARTICIPATION

During preparation of the EA, the public was notified of the proposed action by posting on the BLM National Environmental Policy Act (NEPA) Register on May 9, 2015. No individuals or groups contacted the BLM in response to that notice. Notification of the availability of the EA for a 30 day comment period was mailed to more than 65 individuals and organizations. The comment period began on June 5, 2015 and ended on July 6, 2015. Notification of the availability of the EA for review was also posted on the BLM NEPA Register on June 4, 2015 and a press release was printed in *The Garfield and Wayne Counties Insider* on June 11, 2015.

#### COMMENT ANALYSIS AND RESPONSE TO PUBLIC COMMENTS

During the 30 day comment period, BLM received seven emails from six individuals or organizations. Comments received pertained to the issues associated with the following:

- design of the campground and trailhead improvements
- non accommodation of oversize vehicles and groups
- enforcement of campground use rules
- floodplains
- interpretation and outreach
- recreation planning in the vicinity
- campground access road that is also a driveway ROW providing access to private property

- signage

BLM's responses to public comments are included in Table 5.2. below.

**Table 5.2. Public Comments and BLM Responses**

Topic	Comment	BLM Response
Campground Design	<p>First, as context I travel through the campground regularly to access the private land to the north. I have on numerous occasions been blocked by vehicles on the main drive. These are most often trailers trying to turn around, but I have more than once been blocked by vehicles simply parked at the end of the drive where it enters Deer Creek, people effectively choosing this spot as a campsite.</p> <p>I am unable to discern from the site plans in the EA if the "turnaround" will be adequate to handle the inevitable trailers that will be required to turn around at the end of the campground.</p> <p>The limitation of the campsite to 20' vehicular length is I believe also problematic. Again, I travel through this campground regularly. I also live in Boulder and see the traffic representative of the visitors to the monument. More and more visitors are pulling smaller camp trailers and popups. By eliminating instead of accommodating their use in the campground, you are effectively pushing them elsewhere.</p>	<p>Please see Pages 14 15 regarding Recreation Impacts .</p> <p>Deer Creek Campground does not have the physical space to allow for expanding the existing footprint to accommodate oversize vehicles or vehicles pulling trailers. The dimensions of a standard size vehicle are approximately 6 feet by 16 feet, and it needs turning radii of 13 feet (inside) and 23 feet (outside). The dimensions of a vehicle pulling a camp trailer can be double to triple that of a standard size vehicle with turning radii of approximately 20 feet or more (inside) and 35 feet or more (outside). On the bench areas out of the riparian zone, Deer Creek Campground measures approximately 150 feet at its widest location. In most locations the width is approximately 100 feet. The turnaround area is approximately 30 feet across.</p>
Campground Design	<p>The campers are continuously parked in our way. We have to squeeze and weave between the cars nearly every time we pass through. This new design ignores the fact that over half of the campers have multiple cars and all different users park in the last space on the left which will be the turnaround. I have a very hard time driving my 30 foot long 10 wheeler through without asking people to move. After the road is widened and parking is limited to one vehicle there will be cars lining the road and parked in the turnaround.</p>	
Non accommodation of oversize vehicles and oversize groups	<p>I also live in Boulder and see the traffic representative of the visitors to the monument. More and more visitors are pulling smaller camp trailers and popups. By eliminating instead of accommodating their use in the campground, you are effectively pushing them elsewhere. Where is this? Two locations immediately come to mind. The first is the old county road maintenance staging area a few</p>	<p>Please see Pages 14 15 regarding Recreation Impacts .</p> <p>BLM agrees that dispersed camping has become a problem along the Burr Trail and in other areas of the Monument. An unknown number of users who have traditionally used Deer Creek Campground may not be able to continue camping here with multiple or oversize vehicles</p>

	<p>miles west on the Burr Trail, locally known as "Lone Pine" named after the mature Ponderosa tree that grows there. The other is the dispersed camping area a mile or so east of Deer Creek on the Burr Trail (between the Gulch and Deer Creek). Both are heavily used already, but represent the obvious default camping area for those pulling trailers. Human waste and trash are <i>always evident</i> in these areas. Is it wise to keep focusing and potentially increasing the use of these areas without planning for the increase? Are pit toilets warranted in these areas? Will they be warranted when camping pressure increases as trailers are eliminated from Deer Creek. Is elimination or "non accommodation" of trailers in the campground improvement plans warranted when they will likely cause increased pressure in non developed areas? What has more impact on undeveloped areas, a tent or a trailer?</p>	<p>or large groups, but again, we think many users already are diverting to other locations better suited to their needs, and that those who are accommodated at the site will appreciate the reduced crowding and congestion.</p> <p>The project area is located within the Escalante Canyons Special Recreation Management Area (SRMA). BLM anticipates initiating a number of NEPA proposals in the next few years including an Escalante Canyons SRMA planning effort to address increasing visitation in the Escalante Canyons and associated issues noted in public comments such as the need for designated primitive camp sites, group camp sites, and sanitation facilities.</p>
Non accommodation of oversize vehicles and oversize groups	Start saving some money for a toilet at the old gravel pit with the ponderosa pine tree between the Draw and DC. I think that this is the area that will pick up the trailer folks and larger groups.	
Enforcement	There is no enforcement...	BLM does have a limited number of Law Enforcement Rangers. When Law Enforcement Rangers are in the area they do patrol Deer Creek Campground. Garfield County Sheriff's Office is also available to assist in resolving conflicts. BLM also has a number of Park Rangers who can educate visitors and resolve issues. Most user conflicts arise from a lack of information. Proper signing (see section on signing below) and management can reduce the number of conflicts. Violations of proposed management actions would be resolved with less conflict because of clear rules.
Enforcement	Protocol for violating campground rules of use? Enforcement of rules of parking and camping?	
Enforcement	I do not want to be in the position of having to enforce BLM rules about parking and traffic movement so that I can access my home and no one wants or welcomes conflicts.	
Floodplains	<p>My other concern is the current location of the campground on potentially active floodplain. While Deer Creek has not flooded significantly in the life of the campground, a flood event this spring did go over the Burr Trail, as well as entering the campground from the north and partially moving/floating a trailer parked there. What intensity was this flood event? Was it a 30 year flood? A 50 year flood? 100? Although, I saw no mention in the EA, I wonder if a hydrogeologic study is warranted. What are the sediments that the campground is built on? I would wager that they are alluvial, and reflect a</p>	Sections on Floodplain Impacts were added to EA. Please see Pages 13 and 17.

	<p>floodplain built by periodic flood events. Given that current climate models predict increasingly severe weather events, I feel planning based on "the campground hasn't flooded historically" is not prudent. Is there a hydrogeologic study related to the construction of the original campground? What does it say? What is the flood periodicity of the site? What were the flood magnitudes? What does modelling say would happen in a 100 year flood event? A five hundred year event? If there is not a study why hasn't one been done? A nighttime monsoon deluge in the upper Deer Creek basin could be devastating to a full campground. Is this wise? Since the "improvement" of the campground is nearly a complete rebuilding, would it be smarter to use current funding to move the campground to a safer location perhaps one of the existing dispersed camping areas I mention above? Accommodation issues due to space limitations as well as exposure to natural hazards could both be addressed.</p>	
Floodplains	The turnaround floods even in smaller events and will pose a hazard.	
General	In response to your letter regarding the proposed improvements, the Kaibab Tribe does not submit any comments regarding the proposed project. Thank you for your time and for contacting the Kaibab Tribe for consultation.	N/A
Interpretation/ Outreach	<p>In general I think that this is going to be a PAINFUL change for some very long time users of the campground.</p> <p>I think that making this transition easier for users should be a goal so I recommend a simple handout for the Escalante VC and the BLM station at the Anasazi SP. I think that this brochure (two fold, maybe) should have a map and all the rules and lots of interpretive information for this beautiful spot.</p> <p>Also, because this is a beautiful riparian area I would love for you to have some natural history info (at least enough so that they stop thinking the buffaloberry is Russian olive :)</p>	BLM is developing interpretive messaging related to this project and will take into account the suggestions provided by the public. We are also initiating increased campground patrols.
Recreation Planning	While I understand the need to upgrade the current facilities to reflect current statutory use standards, I also feel that Deer Creek Campground does not stand in isolation, but fits into a bigger picture of land use in the Monument. More specifically, perhaps it would be more prudent to think about how current	Per the <i>GSENM Monument Management Plan</i> (MMP), Deer Creek Campground is to be the only developed campground in the Monument's Passage Zone. It goes on to note that up to 25 designated primitive camping sites may be identified in this zone but toilets and other amenities are not to be provided at those

	<p>plans fit into the patterns of visitor use that show (I believe), increased visitation, increase use of small camping trailers by visitors, and changes in climate just to mention a few. Is the Monument going to have to rebuild the campground due to flooding in the future and potentially how soon (where are the studies)? <i>What are the liabilities?</i> Maybe, to alleviate increased pressure, the Monument will have to build pit toilets in the currently heavily used dispersed camping areas (similar to the issues at the Peekaboo and Spooky parking lot)? I believe it would be wise to step back and think about these issues before significant money is spent on a project that in its current form has the potential to increase use in areas already heavily used but containing no facilities, or simply not accounting for natural hazards like periodic flooding.</p>	<p>locations. These decisions are partially predicated on retaining the undeveloped, frontier character of the Monument and also encouraging economic development in the local communities. With this in mind, BLM determined that upgrading the existing facilities was warranted.</p> <p>BLM recognizes that visitation has increased to the point that existing management prescriptions may need to be revisited. Any changes to the MMP would require a plan amendment. The project area is located within the Escalante Canyons Special Recreation Management Area (SRMA), and BLM anticipates initiating a number of NEPA proposals in the next few years including development of a recreation area management plan for the Escalante Canyons SRMA to address the growing visitation in the Escalante Canyons and associated issues noted in public comments such as the need for designated primitive camp sites, group camp sites, and sanitation facilities. Plan amendments could be addressed in this planning effort if determined to be warranted.</p>
ROW	<p>Now is the time for the BLM to restore 1,600 feet of riparian area by moving our road to the original route across the creek. Doing this would only impact about 150 feet of riparian while allowing the restoration of 1600 feet of riparian and our road would not have to ford the creek where the campers wade and put their chairs. The new road alignment would be below the archeological sites so there would be no impact to them and would only require one culvert, would use the original existing gate and dug way and would need to be graveled. This would give the campers a less impacted experience, keep us from driving in the creek and allow for the restoration of 1600 feet of riparian area.</p>	<p>Though BLM is aware of the issues associated with the driveway ROW and campground site road, the agency decided against including a ROW action in this project analysis. An application to issue a ROW in another location has not been received by BLM. Moving the ROW would be complicated and needs to address numerous issues (i.e. potential T&amp;E plants species habitat, a Wilderness Study Area that surrounds the campground and private property, Wild and Scenic River suitable segments, riparian concerns, etc.).</p> <p>Processing a new ROW application would slow down the process for moving forward on upgrading the recreation sites for which BLM has secured deferred maintenance funds that need to spend in the near future. Moving the ROW would need to be addressed in a separate lands action and environmental review.</p>
ROW	<p>I have a concern about the current roadway that travels initially up the stream and then through a marshy area. I've seen that roadway battered by flash floods and subsequent traffic and wondered if any consideration is given during this time of work on Deer Creek Campground of putting that road just on the other side of the stream, to avoid the sensitive wet ground near the stream. Another benefit of that is that our residential traffic would not be routed through the campground which sometimes can be disturbing to campers. It</p>	

	would seem that now with the equipment already available it would be a logical time to address the problems associated with the road.	
ROW	<p>Our ROW I am so sorry that we have not made progress toward getting this ROW out of the campground. I think that the landowners and BLM should work together toward this goal. I realize that this issue is beyond the scope of this EA but...</p> <p>Lastly, and on the ROW note: I would be happy to work with BLM to try to make this transition as painless as possible on the upstream landowners as possible. If there is anything that we can do to help, let us know.</p>	
ROW	<p>I am surprised that the Deer Creek Ranch road access rerouting was not part of this plan. As someone who drives through the campground almost daily in the summer time I see and have contact with the campers. There are many small camper units using the campground. I think that widening the road would be helpful but I really see the biggest issue is that the access for the ranch runs right through the campsite. It is not really compatible with the campers recreational experience and it can be frustrating for those who have access through as there are folks parked or stuck in the access right away.</p> <p>I propose you look at the rerouting of the ranch access as part of your plan. I believe that a solution could be found, that would benefit the campers enjoyment of the site more profoundly than any other plan on this EA (well the bathrooms, are probably a high priority).</p>	
Signage	<p>First, as context I travel through the campground regularly to access the private land to the north. I have on numerous occasions been blocked by vehicles on the main drive. These are most often trailers trying to turn around, but I have more than once been blocked by vehicles simply parked at the end of the drive where it enters Deer Creek, people effectively choosing this spot as a campsite. This happens irrespective of any signage notifying users not to block the private drive and that the campground is not suited to trailers. Current signage is clearly not effective. My experience is that people will still attempt to use trailers in the campsite regardless of signage, but I am unable to discern from the site plans in the EA if</p>	<p>BLM is developing a detailed sign plan for the project area and will take into account the suggestions provided by the public. A detailed sign plan was not included in the EA to allow for flexibility in adjusting signs in the future as the need arises.</p> <p>Unfortunately, BLM has no control over whether or not users read the signs the agency installs. We plan to use the best communication theory possible to insure their readability by a wide variety and demographic of users, including international visitors.</p>



	the "turnaround" will be adequate to handle the inevitable trailers that will be required to turn around at the end of the campground. I saw mention of new signage in the EA, but no description. What will the new signs be like? Will they be able to reduce the influx of trailers? Will they stop people from parking in the private drive? Again, current signage clearly does not.	
Signage	...most don't read signs.	
Signage	<p>Overall, my comments reflect the fact that this is a self serve area with little oversight that has been chronically undersigned. Generally, I think that BLM should maximize every opportunity to direct and educate the public as to BLM's goals regarding size (vehicle and party) suitability at this site.</p> <p>signs, signs and more signs.... A big ole 'no trailers allowed' on the outside of the campground would be a good start.</p> <p>If you want people to have one tent per site on the one pad per site and one car in each site you have to make this clear. I am sure that at the fee station you will have a list of rules but I would also have an introductory piece that explains why you are limiting the groups size (if you are) and the vehicle numbers. I would also like to have campers know that there is a through road through the campground and that they are not to block access, 2 3 signs indicating this should be adequate (maybe).</p> <p>Signing at the north end is going to be critical. This site often has 16 boy scouts, 4 vehicles and a trailer augered in.</p>	
Signage	The best thing would be for the campground to be very effectively sign. Personally, I think that education can go a long way but in the absence of educated people, what's the protocol going to be for violating your campground rules regarding use? How is BLM going to enforce the rules on parking and camping?	
Trailhead Design	The trailhead gets buried with sand each time it floods and sometimes with rocks and debris from the south drainage of the road coming down the hill. A wood fence will restrict the county from cleaning up the debris and will become buried. The parking area has been graveled before but is now buried. Also if the BLM has a designated parking area and Deer Creek floods over the road as it has and ruins	<p>Please see Pages 14 15 regarding Recreation Impacts .</p> <p>BLM is aware that the trailhead is used by both day users and overnight visitors. We agree that day use seems to be growing at greater rates within the Escalante Canyons than overnight backpacking. Trailhead registers record an average of 460 visits annually accounting for</p>

	the vehicles, is the BLM responsible?	1,454 visitor days as the 5 year average for use at this trailhead. A combination of tools including increased ranger patrols and new signage should help visitors to comply with use regulations. If significant parking issues occur, law enforcement would also play a role in assisting with compliance.
Trailhead Design	<p>I think that this trailhead parking was, at one time, gravelled but has since been covered with sand from flooding. The western side of the parking lot is flooded from down the road and from the adjacent cliff with great frequency. Because there is no drainage work to direct the water away from the parking lot, the floods deposit sand, rocks and make gullies in the lot. Occasionally, someone with a blade (the county?) grades the parking lot. Also, on the east side Deer Creek has twice in 30 years inundated this end of the parking lot.</p> <p>My recommendation is that you define the parking lot not with a fence but with large (2x) boulders and do not gravel the lot. Both a gravel surface and a fence are maintenance items. In this way the blade can still clear the flood debris without impacting a fence, the fence will not get buried by flood debris and you won't create a continuous drainage maintenance item for BLM that a fence would require. If you gravel the lot you will need to design drainage for flood waters. If you put the boulders close together then you may eliminate the social trailing issue as well. Additionally, a small directional sign would be helpful for people to get on the one and only track.</p> <p>The plan indicates that the lot will be smaller but fit more cars. If parking is to be delineated as per the plan, then I recommend signs. Otherwise you will have willy nilly parking and fit less cars. Years ago BLM reduced the size of the Escalante x Highway 12 parking lot by about 75% and this has clearly resulted in parking up and down the highway. It would be good to avoid this situation as the DC parking lot is on a blind sweep in the road and people approach this turn pretty fast from the Circle Cliffs side. Reducing capacity at the Escalante TH lot was not a good strategy for reducing the number of parked cars and I don't think it will be at DC either.</p> <p>I think that day use is more common than you think. I recognize local cars in the lot frequently.</p> <p>Lastly, I think that it is likely that people who show up to camp at the campground in groups with 2 cars will leave one at this lot.</p>	

**LIST OF PREPARERS**

BLM staff specialists who determined the affected resources for this document are listed in Appendix D. Those who contributed further analysis in the body of this EA are listed below.

**Table 5.3. List of Preparers**

Name	Title	Responsible for the Following Section(s) of this Document
Alysia Angus	Project Lead Landscape Architect	Technical Coordination Quality Control MMP Compliance Impact Analysis for Visual Resources
David Barfuss	Engineer	Site Designs
Jabe Beal	Outdoor Recreation Planner	Impact Analysis for Recreation
Raymond Brinkerhoff	Botanist	Impact Analysis for Threatened and Endangered Plant Species
Katherine Farrell and Amber Hughes	Planning and Environmental Coordinator	NEPA Compliance Quality Control
Mark Foley	Realty Specialist	Impacts to Lands and Realty
Lora Gale	Outdoor Recreation Planner	Impact Analysis for Wilderness Study Areas Impact Analysis for Wild and Scenic Rivers
Eric Matranga	GIS Specialist	Maps

## **CHAPTER 6**

### **REFERENCES AND ACRONYMS**

#### **REFERENCES CITED**

Bureau of Land Management. Guidelines For A Quality Built Environment. 2010. Available at: [http://www.blm.gov/pgdata/etc/medialib/blm/wo/Planning\\_and\\_Renewable\\_Resources/recreation\\_images/national\\_programs/VRM.Par.62809.File.dat/GQBE\\_WEB.pdf](http://www.blm.gov/pgdata/etc/medialib/blm/wo/Planning_and_Renewable_Resources/recreation_images/national_programs/VRM.Par.62809.File.dat/GQBE_WEB.pdf).

Bureau of Land Management. Recreation Management Information System. 2012. Web based system.

Architectural and Transportation Barriers Compliance Board. Architectural Barriers Act Accessibility Guidelines; Outdoor Developed Areas. Washington, DC. 2013. [http://www.access-board.gov/guidelines\\_and\\_standards/recreation\\_facilities/outdoor\\_developed\\_areas/final\\_guidelines\\_for\\_outdoor\\_developed\\_areas](http://www.access-board.gov/guidelines_and_standards/recreation_facilities/outdoor_developed_areas/final_guidelines_for_outdoor_developed_areas).

#### **LIST OF ACRONYMS**

BLM – Bureau of Land Management  
EA – Environmental Assessment  
EIS – Environmental Impact Statement  
ESA – Endangered Species Act  
FLPMA – Federal Land Policy and Management Act  
GSENM – Grand Staircase Escalante National Monument  
IDT – Interdisciplinary Team Checklist  
ISA – Instant Study Area  
KOP – Key Observation Point  
MMP – Monument Management Plan  
NCA – National Conservation Area  
NEPA – National Environmental Policy Act  
NLCS – National Landscape Conservation System  
NWSRS – National Wild and Scenic Rivers System  
OPLMA – Omnibus Public Land Management Act  
ORV – Outstanding Remarkable Values  
ROW – Right of Way  
VRM – Visual Resource Management  
WSR – Wild and Scenic River  
WSA – Wilderness Study Area

**APPENDIX A**  
**DEER CREEK CAMPGROUND AND TRAILHEAD PROJECT AREA MAP**



**APPENDIX B**  
**DEER CREEK RECREATION SITE AND WSAs MAP**





**APPENDIX C**  
**DEER CREEK SITE DESIGN DRAWINGS**



## APPENDIX D INTERDISCIPLINARY TEAM CHECKLIST

Project Title: Deer Creek Campground Improvements  
NEPA Log Number: DOI BLM UT 0300 2015 0016 EA  
Project Leader: Allaysia Angus

**DETERMINATION OF STAFF: (Choose one of the following abbreviated options for the left column)**

NP = not present in the area impacted by the proposed or alternative actions  
NI = present, but not affected to a degree that detailed analysis is required  
PI = present with potential for impact that needs to be analyzed in detail  
NC = (DNAs only) actions and impacts not changed from those disclosed in the existing NEPA documents cited in Section D of the DNA form  
The rationale column may include NI and NP discussions.

**RESOURCES AND ISSUES CONSIDERED INCLUDES SUPPLEMENTAL AUTHORITIES (APPENDIX 1 H-1790-1)**

Determination	Resource	Rationale for Determination*	Signature	Date
NI	Air Quality (Miller)	Construction will result in surface disturbance in a limited area. Particulate matter and gaseous pollutants generated during construction should be quickly dispersed and have no measurable effect on air quality. During normal operations, both particulate and gaseous pollutants should be minimal.	/s/ khmiller	04/28/2015
NP	Areas of Critical Environmental Concern (Beal/Gale)	No Areas of Critical Environmental Concern are designated within Grand Staircase-Escalante National Monument.	/s/ J. Beal	4/21/2015
NI	Biological Soil Crusts (Brinkerhoff)	The majority of the surface disturbance is within an existing disturbance area therefore the impacts to the existing soil crusts would be minimal.	/s/R. Brinkerhoff	4/29/15
NI	BLM Natural Areas (Beal)	This project is not within a Natural Area.	/s/ J. Beal	4/21/2015
NP	Cultural Resources (Zweifel)	Previous inventory work and recent field inspections for this project have found no cultural resource sites in the campground area. However, monitoring of excavations for the proposed vault toilet is recommended in the event that an unidentified, sub-surface site exists at this location.	/s/ M. Zweifel	4/24/2015
NI	Greenhouse Gas Emissions (Miller)	Emissions generated during construction should be quickly dispersed and have no measurable effect. During normal operations, emissions should be minimal.	/s/ khmiller	04/28/2015
NI	Environmental Justice (Farrell)	The proposal would not have disproportionate effects on low income or minority communities. According to the EPA EJView Mapper, Garfield and Kane Counties have been categorized as having a minority population of 0-10% and a below poverty population of 0-10%. (Accessed at: <a href="http://epamap14.epa.gov/ejmap/ejmap.aspx?wherestr=Garfield%20County%2C%20UT">http://epamap14.epa.gov/ejmap/ejmap.aspx?wherestr=Garfield%20County%2C%20UT</a> on 2/5/2015.)	/s/ K. Farrell	3/26/15

Determination	Resource	Rationale for Determination*	Signature	Date
NP	Farmlands (Prime or Unique) (Farrell)	Prime farmland is described as farmland with resources available to sustain high levels of production. In general, prime farmland has a dependable water supply, a favorable temperature and growing season, acceptable levels of acidity or alkalinity, an acceptable content of salt and sodium, and few or no rocks. Unique farmland in Utah is primarily in the form of orchards. Based on these definitions, no prime or unique farmlands exist within the Monument. (See NRCS 1997 Results - Cropland Utah accessed at: <a href="http://www.nrcs.usda.gov/wps/portal/nrcs/detail/ut/technical/dma/nri/?cid=nrcs141p2_034092">http://www.nrcs.usda.gov/wps/portal/nrcs/detail/ut/technical/dma/nri/?cid=nrcs141p2_034092</a> on 2/5/2015.)	/s/ K. Farrell	3/26/15
NI	Fish and Wildlife Excluding USFWS Designated Species (McQuivey)	The size, scope and timing of the project are appropriate to minimize potential harmful impacts to wildlife species, including migratory birds, for which there will be no direct impact due to timing. No measurable impacts anticipated.	/s/ C. McQuivey	4/28/15
NI PI	Floodplains (Miller)	There will be no net change in floodplains impacts (impacts from road widening; new fee station, toilet and information kiosk pullouts; new sand tent pads, tables and fire rings on gravel pads; offset by removing existing concrete pads and walkways and one campsite, and reclaiming existing parking layouts). Conversion of trailhead parking area from dirt to gravel/road base within the same footprint is not expected to result in any change in floodplains impacts.  Impact analysis for Floodplains was added after public comments were provided regarding this resource.	/s/ khmiller	05/18/2015 10/06/2015
NI	Fuels/Fire Management (Bate)	Fuels and Fire Management would remain as it is currently, the proposed action would not increase or decrease fuel or fire management for the Deer Creek Campground.	/s/ A.Bate	4/23/2015
NI	Geology / Mineral Resources/Energy Production (Titus)	Site of proposed action is located among outcrops of Navajo SS. No special geologic features are identified in the area. No geological hazards identified in area. Energy and mineral production would not be affected as there are no valid existing leases at the site.	/s/ Alan Titus	4/21/2015
NI	Hydrologic Conditions (Miller)	There will be no net change in hydrologic conditions (impacts from road widening; new fee station, toilet and information kiosk pullouts; new sand tent pads, tables and fire rings on gravel pads; offset by removing existing concrete pads and walkways and one campsite, and reclaiming existing parking layouts). Conversion of trailhead parking area from dirt to gravel/road base within the same footprint may improve hydrologic conditions by stabilizing soils and reducing runoff.	/s/ khmiller	05/18/2015
NP	Invasive Species/Noxious Weeds (EO 13112) (Brinkerhoff)	Standard weed washing stipulations will be implemented prior to any equipment arriving on site. This will decrease the threat of invasive or noxious weeds.	/s/R. Brinkerhoff	4/29/15
PI	Lands/Access (Foley)	Lands and Realty issues have been addressed in the EA.	/s/ Mark Foley	9/9/2015
NI	Livestock Grazing (Stewart)	Livestock are excluded from campground portion of the proposed action therefore the action would not impact livestock grazing. The size and scope of the proposed trail head work would not have any anticipated impacts to grazing.	/s/ S. Stewart	4/26/2015

Determination	Resource	Rationale for Determination*	Signature	Date
NI	Native American Religious Concerns (Zweifel)	No cultural resource sites are found at this location, and no restrictions of any sort will be applied. This project will be included in the annual GSENM/Native American consultations, but no comments are anticipated.	/s/ M. Zweifel	4/24/2015
NI	Paleontology (Titus)	Site of proposed action is located among outcrops of Navajo SS with no documented fossil sites. Project work would be done on Holocene alluvium and modern dirt with no potential for fossils.	/s/ Alan Titus	4/21/2015
NI	Rangeland Health Standards (Stewart)	The site of proposed action is in and adjacent to an existing campground and trailhead. Due to the small area and the location type there are no anticipated impacts to rangeland health standards.	/s/S. Stewart	4/26/2015
PI	Recreation (Beal/Gale)	Recreation issues are addressed in the EA.	/s/ J. Beal	5/6/2015
NI	Socio-Economics (Farrell)	The proposed action is not likely to provide any noticeable impact to the local economy. The amount of economic activity generated by improving the campground is small. Once improvements are completed, the amount of use and activity is not expected to increase from that generated by use of the campground today.	/s/ K. Farrell	3/26/15
NI	Soils (Miller)	There will be no net change in soils impacts (impacts from road widening; new fee station, toilet and information kiosk pullouts; new sand tent pads, tables and fire rings on gravel pads; offset by removing existing concrete pads and walkways and one campsite, and reclaiming existing parking layouts). Conversion of trailhead parking area from dirt to gravel/road base within the same footprint may stabilize soils and reduce runoff.	/s/ khmiller	05/18/2015
PI	Threatened, Endangered or Candidate Plant Species (Brinkerhoff)	There is one known plant species of concern within the proposed project site. <i>Spiranthes diluvialis</i> is currently listed as threatened. Prior to work taking place the known populations will be flagged and avoided to minimize any impacts to the plants.	/s/R. Brinkerhoff	4/29/15
NP	Threatened, Endangered or Candidate Animal Species (McQuivey)	There are no known individuals, populations or critical habitat for any federally listed Threatened, Endangered, or Candidate wildlife species within the project area.	/s/ C. McQuivey	4/28/15
NP	Wastes (hazardous or solid) (Pierson)	There will be no industrial wastes or toxic substances used or generated.	/s/ B. Pierson	4/23/15
NI	Water Resources/Quality (drinking/surface/ground) (Miller)	There will be no net change in water resources impacts (impacts from road widening; new fee station, toilet and information kiosk pullouts; new sand tent pads, tables and fire rings on gravel pads; offset by removing existing concrete pads and walkways and one campsite, and reclaiming existing parking layouts). Conversion of trailhead parking area from dirt to gravel/road base within the same footprint may improve water resources by stabilizing soils and reducing runoff.	/s/ khmiller	05/18/2015
NI	Wetlands/Riparian Zones (Brinkerhoff)	The proposed project is located within existing disturbed areas therefore no impacts to the riparian areas are expected from this action.	/s/R. Brinkerhoff	4/29/15

Determination	Resource	Rationale for Determination*	Signature	Date
PI	Wild and Scenic Rivers (Beal/Gale)	This project occurs on Deer Creek, a WSR tributary of the Escalante River, tentatively classified within the campground as <i>recreational</i> and tentatively classified below the campground as a <i>wild</i> section. Project needs to insure no obstruction of wild and free flowing nature of the river or threats to identified <b>Outstanding Remarkable Values</b> which are documented to include threatened plants such as Ute Ladies Tresses and overall protection for high quality scenery and riparian areas.	/s/LGale	4/21/15
PI	Wilderness/WSA (Beal/Gale)	The project footprint and construction boundaries as proposed are not expected to occur within the WSA boundaries which lie proximate to the campground and trailhead. The Deer Creek trailhead is located within an abandoned road alignment for the historic Burr trail which borders the North Escalante Canyons-The Gulch WSA. However, inclusion of language in the EA regarding actual boundaries of construction, contract construction oversight, and protection of WSA boundaries is needed to insure no impact to WSA's..	/s/L.Gale	04/21/15
NI	Woodland/Forestry (Bate)	No Forestry or tree species would be removed or cut in this proposal.	/s/A. Bate	4/22/2015
NI	Vegetation Excluding USFWS Designated Species (Brinkerhoff)	Some vegetation will be removed or disturbed but the overall health of the existing vegetation within the area will not be impacted by the proposed action.	/s/R. Brinkerhoff	4/29/15
PI	Visual Resources (Angus)	Contrast analysis needed to determine conformance with VRM Class objectives.	/s/AAngus	3/26/2015
NP	Wild Horses and Burros (Stewart)	There are no Wild Horse and Burro Herd Management Areas within GSENM.	/s/S. Stewart	4/26/2015
NP	Lands with Wilderness Characteristics (Beal/Gale)	There are no sections of LWC in the project area.	/s/L.Gale	4/21/15

## FINAL REVIEW

Reviewer Title	Signature	Date	Comments
Environmental Coordinator			
Authorized Officer			