To: Peterson, Leah[leah.peterson@sol.doi.gov]; Matthew J Betenson[mbetenso@blm.gov]; Travis Chewning[tchewning@blm.gov]; Amber Hughes[ahughes@blm.gov]; Allysia Angus[aangus@blm.gov]
From: Staszak, Cynthia
Sent: 2017-09-08T09:35:44-04:00
Importance: Normal
Subject: Re: Call tomorrow moved to 11am & attachment
Received: 2017-09-08T09:37:01-04:00
Calf_Creek_Recreation_Area_Improvements_EA.zip
Calf Creek Notification Letter.pdf
Calf_Creek_Decision_Record.pdf
Calf_Creek_Recreation_Improvements_FONSI.pdf
2017_02_01 CCEA Young letter.docx
CC EA Public Comment chart.docx

Leah:

Attached are some of the Calf Creek EA pertinent documents. Let me know if you have any trouble opening any of this.

Cindy Staszak
Monument Manager
Grand Staircase-Escalante National Monument
669 S. Hwy 89-A
Kanab, UT 84741
Office: 435 644-1240
Cell: 435 691-4340
Fax: 435 644-1250

On Thu, Sep 7, 2017 at 1:14 PM, Staszak, Cynthia <cstaszak@blm.gov> wrote:

All:

We need to move the Calf Creek call tomorrow to 11am. I will update the invite. Attached is an old "Mechanics of the Appeal Process" that I got from Solicitors when I worked in Montana. It may be helpful for those of us that rarely deal with appeals.
Leah, this document is from 2009. Do you know of anything more current that might help?

Cindy Staszak
Monument Manager
Grand Staircase-Escalante National Monument
669 S. Hwy 89-A
Kanab, UT 84741

Office: 435 644-1240
Cell: 435 691-4340
Fax: 435 644-1250

FOIA001:01680089

BLM

United States Department of the Interior
Bureau of Land Management

Finding of No Significant Impact

Calf Creek Recreation Area Site Improvements

Environmental Assessment

NEPA No. DOI-BLM-UT-0300-2015-0040-EA

June 2017

Location: Along Highway 12
16 miles east of Escalante, Utah and 13 miles west of Boulder, Utah
Salt Lake Meridian, Garfield County, Utah
Township 35 South, Range 4 East, Section 1

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

NATIONAL CONSERVATION LANDS

DOI-2020-08 01809

FINDING OF NO SIGNIFICANT IMPACT

Calf Creek Recreation Area Site Improvements
Environmental Assessment
NEPA No. DOI-BLM-UT-0300-2015-0040-EA

INTRODUCTION

The Bureau of Land Management (BLM) has prepared an environmental assessment with a Preferred Alternative to upgrade and improve the developed portions of Calf Creek Recreation Area in Grand Staircase-Escalante National Monument (GSENM) in order to address site limitations primarily due to impacts from increased visitation as well as improve the visitor experience. The Preferred Alternative is Alternative B, which proposes:

Parking and Driveway

- Widen site road up to 20 feet wide and repair/replace the driveway bridge.
- Replace low-water crossing with low, end-to-end, open-bottomed concrete culverts.
- Reconfigure the main parking area to increase capacity to approximately 50 spaces.
- Construct overflow parking for up to 20 standard size vehicles near the entrance from Highway 12.
- Construct additional parking for up to 10 standard size vehicles on east side of site road between creek and site sign.
- Reclaim insufficiently sized parking space adjacent to Site #1 (parking for walk-in sites #1 thru #4 would be in main parking area).

Toilets

- Remove and replace vault toilet on east side of campground in same location and install new sidewalk.
- Remove the existing flush toilet building and construct a new one in a different location within the 50 space parking area.

Campground

- Remove old concrete pad and construct two walk-in sites in same location.
- Convert existing site closest to east side of pedestrian bridge to parking for three walk-in sites.
- Reconfigure site #12 to locate tent pad away from the creek.
- Install base material to raise, define, and improve surface stability of campsites.
- Upgrade all existing campsites with flush with the ground tent pads, new fire rings, and tables (as needed – some tables can be reused).
- Replace shade shelters at site #10 and install new shade shelters at sites #9 and #13.
- Replace campsite-numbering posts.
- Repair wooden suspension pedestrian bridge by replacing all timber components.

- Remove electrical conduit from underside of pedestrian bridge and place it inside the abandoned metal water line piping that is supported above the creek but below the bridge.
- Reconfigure camp host site at/near the existing location.

Day Use

- Replace the main self-pay fee station (See Appendix D for Conceptual Design – Page C503 and C504) and construct a second small self-pay fee station.
- Construct natural stone retaining walls that are engineered to stabilize the streambank and provide access to the creek (See Appendix D for Conceptual Design – Page C502).
- Construct universally accessible but unpaved walkways through the day use area, including to the edge of the creek near the water play area.
- Construct a rustic open amphitheater for up to 50 people adjacent to the lower day use picnic area for interpretive and educational programs.
- Remove current group picnic area and move all day use functions to the lower area.
- Install up to three small shade shelters and one large group shelter in lower portion of day use area.

Trailhead

- Improve the Lower Calf Creek Fall Trailhead access and reduce erosion by replacing stone stairs, stabilizing erosion prone areas, and relocating trailhead kiosk and register if needed.

Misc. Site Elements

- Install barriers (i.e. boulders and/or rail fencing) as needed to define areas and prevent vegetation and soil trampling.
- Install directional, informational, and interpretive signage as necessary.
- Replace all fabricated block retaining walls with natural stone walls.
- Plant cottonwood trees and other riparian vegetation in the lower day use area and along the creek as necessary. Plant or seed using native plants in disturbed areas outside the riparian zone.

See Appendix D of EA for Conceptual Design – Page C505 and C506.

Calf Creek Recreation Area is located along Highway 12 between Escalante and Boulder, Utah in Garfield County and adjacent to Calf Creek, a tributary of the Escalante River. The Calf Creek Recreation Area is located in the Monument's Frontcountry Zone and was constructed in 1962-1963. This developed portion of the Calf Creek Recreation Area is the most visited site on GSENM. The project area is approximately 20 acres; it includes the Calf Creek Campground and Day Use Area, as well as the Lower Calf Creek Falls Trailhead. The Preferred Alternative is more fully described in Environmental Assessment No. DOI-BLM-UT-0300-2015-0040-EA. This EA is available at the Grand Staircase-Escalante National Monument Headquarters office at 669 South Highway 89A in Kanab, Utah. It analyzed two Alternatives 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 20 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; the campground currently has 13 sites and a parking area that accommodates up to 30 vehicles, the Calf Creek Recreation Area is small and does not have international, national, regional, or statewide 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 Preferred Alternative 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 the Calf Creek Recreation Area; these impacts may be both beneficial and adverse. Where needed, design features to reduce impacts to Cultural Resources, Threatened and Endangered Animal Species, Migratory Birds, Floodplains, Hydrologic Conditions, Recreation, Soils, Water Resources, Wetlands and Riparian Zones, Wild and Scenic River suitable segments, visuals resources, and vegetation were incorporated into the Preferred Alternative. None of the environmental consequences discussed in detail in the EA are considered significant.

2. The activities included in the Preferred Alternative will not significantly affect public health or safety (40 CFR 1508.27(b)(2)). The proposal improves accessibility to the amenities in the campground.

3. The Preferred Alternative will 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 affect 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 three sites recorded; 42Ga6091 (the historic Boulder-Escalante road), 42Ga8060 (Calf Creek Campground), and 42Ga1431 (a prehistoric rock art site). The project area is surrounded by wilderness study areas; a wild and scenic river suitable segment runs through it; and wetlands exist adjacent to project area. The impacts to Cultural Resources, Floodplains, Hydrologic Conditions, Recreation, Soil, Water Resources, Wetlands/Riparian Zone, Wild and Scenic Rivers, Visual Resources, and Vegetation excluding U.S. Fish and Wildlife Services designated species were analyzed in detail in Chapter 4 of the EA; none of the impacts will be significant because the proposed action is designed to prevent adverse impacts to these areas.

4. The activities described in the Preferred Alternative 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 Preferred Alternative 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 Calf Creek Recreation Area will 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 will 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 Preferred Alternative 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). I have determined that the activities described in the Preferred Alternative will effect two sites eligible for listing in the National Register of Historic Places (40 CFR 1508.27(b). Calf Creek Campground has been recorded as site 42Ga8060, and the old Escalante-Boulder road has been recorded as site 42Ga6091; both are considered eligible to the National Register. Consultation with SHPO has determined appropriate mitigation measures for loss of the historic campground structures, and use of the old road as an overflow parking area has been determined to be a beneficial effect. A rock art site, 42Ga1431 is also found in the campground area, but will not be effected by the proposed actions.

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)). Mexican Spotted Owls (MSO) have been observed in the Calf Creek Tributary on several occasions. Nesting has never been confirmed and are thought to be migrants. There is no Protected Activity Center for MSO established in this area. Due to the cliff nature of Calf Creek, I have determined that there is potential for nesting habitat in this area. To avoid impacts to nesting MSO due to project activity and noise, certain proposed improvements, will occur only between September and February 28 (See Appendix A).
A survey for migratory birds during nesting season will be completed immediately before implementing proposed improvements, no more than seven to ten days prior. At least a 100-foot buffer for active nests is generally recommended and ground-disturbing activities will be postponed until the birds have fledged and are no longer dependent on the nest (see appendix A).

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 Preferred Alternative 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 _____ 6/16/17 _____

Cynthia Staszak
Monument Manager
Grand Staircase-Escalante National Monument

Date

Attachments:
Appendix A - Avoidance Design Features for Mexican Spotted Owls & Migratory Bird Species

Appendix A

Avoidance Design Features for Mexican Spotted Owls & Migratory Bird Species

Alternative B Proposed Actions	Proposed improvements to be done between August 31 & February 28	Proposed improvements to be done year round
Parking and Driveway		
Widen site road up to 20 feet wide and repair/replace driveway bridge	X	
Replace low-water crossing with low, open-bottomed (three-sided) box culverts	X	
Construct overflow parking for up to 20 standard size vehicles and a small fee station near the entrance from HWY 12	X	
Construct additional parking for up to 10 standard size vehicles on east side of site road between creek and site sign	X	
Reclaim insufficiently sized parking space adjacent to Site #1 (Walk-in sites #1 thru #4 would be in main parking area).	X	
Reconfigure the main parking area to increase capacity to approximately 50 spaces	X	
Toilets		
Remove and replace vault toilet on east side of campground in same location and install replace sidewalk	X	
Construct a new flush toilet building in center of parking turnaround	X	
Campground		
Remove old concrete pad and construct two walk-in sites in same location.	X	
Convert existing site closest to east side of pedestrian bridge to parking for three walk-in sites	X	
Reconfigure site #11 to locate tent pad near the parking and away from the creek	X	
Install base material to raise, define, and improve surface stability of campsites	X	
Upgrade all existing campsites with tent pads, new fire rings, and tables (as needed – some tables can be reused)		X
Replace shade shelters at site #10 and install new shade shelters at sites #9 and #13	X	

Replace campsite numbering posts		X
Repair wooden suspension pedestrian bridge by replacing all timber components		X
Remove electrical conduit from underside of pedestrian bridge and place it inside the abandoned metal water line piping that is supported above the creek but below the bridge		X
Reconfigure camp host site at/near the existing location		X
Day Use		
Replace fee station		X
Constructing natural stone retaining walls that are engineered to stabilize the streambank and provide access to the creek	X	
Construct universally-accessible but unpaved walkways through the day use area, including to the edge of the creek	X	
Construct amphitheater for up to 50 people in day use area for interpretive/educational program use	X	
Plant cottonwood trees and other riparian vegetation in the lower area	X	
Remove current group picnic area and move all day use functions to lower area	X	
Install three small, single-party shade shelters and one large group shelter in lower portion of day use area	X	
Trailhead		
Improve hiking access and reduce erosion at the Lower Calf Creek Fall Trailhead by replacing stone stairs, stabilizing erosion prone areas, and relocating trailhead kiosk and register if needed		X
Miscellaneous Improvements		
Install barriers (i.e. boulders and/or rail fencing) as needed to define areas and prevent vegetation and soil trampling		X
Install directional, informational, and interpretive signage as necessary		X
Replace all fabricated block retaining walls with natural stone walls	X	

United States Department of the Interior

BUREAU OF LAND MANAGEMENT
Grand Staircase Escalante National Monument
669 South Highway 89 A
Kanab, UT 84741
http://www.ut.blm.gov/monument

August 1, 2017

In Reply Refer To:
1792/6843 (UT030)

Your Reference: DOI-BLM-UT-0300-2015-0040-EA

Dear Reader:

This letter is notification that a Decision Record (DR) and a Finding of No Significant Impact (FONSI) with regards to the Calf Creek Recreation Area Site Improvements Environmental Assessment (EA) DOI-BLM-UT-0300-2015-0040-EA has been signed. The decision to select the Alternative B Proposed Action includes upgrading these facilities to replace old, deteriorated site amenities, improve vehicular circulation, improve accessibility, reduce vegetation and soil trampling, and improve the recreational experience. You may view these documents at BLM's ePlanning site by following this link https://go.usa.gov/xRPZ4 .

This decision may be appealed to the Interior Board of Land Appeals (IBLA), Office of the Secretary, in accordance with the regulations contained in 43 CFR Part 4. Any appeal must be filed within 30 days of this decision notification. Any notice of appeal must be filed with Cynthia Staszak, Monument Manager, 69 South Highway 89A Kanab, Utah 84741. The appellant shall serve a copy of the notice of appeal and any statement of reasons, written arguments, or briefs on each adverse party named in the decision, not later than 15 days after filing such document (see 43 CFR 4.413(a)). Failure to serve within the time required will subject the appeal to summary dismissal (see 43 CFR 4.413(b)). If a statement of reasons for the appeal is not included with the notice, it must be filed with the IBLA, Office of Hearings and Appeals, U. S. Department of the Interior, 801 North Quincy St., Suite 300, Arlington, VA 22203 within 30 days after the notice of appeal is filed with the Monument Manager, Cynthia Staszak.

Notwithstanding the provisions of 43 CFR 4.21(a)(1), filing a notice of appeal under 43 CFR Part 4 does not automatically suspend the effect of the decision. If you wish to file a petition for a stay of the effectiveness of this decision during the time that your appeal is being reviewed by the Board, the petition for a stay must accompany your notice of appeal.

A petition for a stay is required to show sufficient justification based on the following standards:

(1) The relative harm to the parties if the stay is granted or denied;
(2) The likelihood of the appellant's success on the merits;
(3) The likelihood of immediate and irreparable harm if the stay is not granted; and
(4) Whether the public interest favors granting the stay.

In the event a request for stay or an appeal is filed, the person/party requesting the stay or filing the appeal must serve a copy of the appeal on the Regional Solicitor's Office, Wallace F. Bennett Federal Building, 125 South State Street Mailstop 201, Salt Lake City, UT 84138.

Thank you for participating in the analysis of this project.

Sincerely,

Cynthia Staszak
Monument Manager
Grand Staircase-Escalante National Monument

FOIA001:01680084

BLM

United States Department of the Interior
Bureau of Land Management

Decision Record

Calf Creek Recreation Area Site Improvements

Environmental Assessment

DOI-BLM-UT-0300-2015-0040-EA

June 2017

Location: Along Highway 12
16 miles east of Escalante, Utah and 13 miles west of Boulder, Utah
Salt Lake Meridian, Garfield County, Utah
Township 35 South, Range 4 East, Section 1

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

NATIONAL CONSERVATION LANDS

DOI-2020-08 01819

DECISION RECORD

Calf Creek Recreation Area Site Improvements
Environmental Assessment
NEPA No. DOI-BLM-UT-0300-2015-0040-EA

I. DECISION

I have decided to select the Alternative B Proposed Action for implementation as described in the June 2017 Calf Creek Recreation Area Site Improvements EA. Based on my review of the EA and project record, I have concluded that the Alternative B Proposed Action was analyzed in sufficient detail to allow me to make an informed decision. I have selected this alternative because upgrading these facilities will replace old, deteriorated site amenities, improve vehicular circulation, improve accessibility, reduce vegetation and soil trampling, and improve the recreational experience.

My decision includes the following:

Parking and Driveway

- Widen site road up to 20 feet wide and repair/replace the driveway bridge.
- Replace low-water crossing with low, end-to-end, open-bottomed concrete culverts.
- Reconfigure the main parking area to increase capacity to approximately 50 spaces.
- Construct overflow parking for up to 20 standard size vehicles near the entrance from Highway 12.
- Construct additional parking for up to 10 standard size vehicles on east side of site road between creek and site sign.
- Reclaim insufficiently sized parking space adjacent to Site #1 (parking for walk-in sites #1 thru #4 will be in main parking area).

Toilets

- Remove and replace vault toilet on east side of campground in same location and install new sidewalk.
- Remove the existing flush toilet building and construct a new one in a different location within the 50 space parking area.

Campground

- Remove old concrete pad and construct two walk-in sites in same location.
- Convert existing site closest to east side of pedestrian bridge to parking for three walk-in sites.
- Reconfigure site #12 to locate tent pad away from the creek.
- Install base material to raise, define, and improve surface stability of campsites.
- Upgrade all existing campsites with flush with the ground tent pads, new fire rings, and tables (as needed – some tables can be reused).
- Replace shade shelters at site #10 and install new shade shelters at sites #9 and #13.
- Replace campsite numbering posts.
- Repair wooden suspension pedestrian bridge by replacing all timber components.

- Remove electrical conduit from underside of pedestrian bridge and place it inside the abandoned metal water line piping that is supported above the creek but below the bridge.
- Reconfigure camp host site at/near the existing location.

Day Use

- Replace the main self-pay fee station (See Appendix D for Conceptual Design – Page C503 and C504) and construct a second small self-pay fee station at the upper parking area.
- Construct natural stone retaining walls that are engineered to stabilize the streambank and provide access to the creek (See Appendix D for Conceptual Design – Page C502).
- Construct universally-accessible but unpaved walkways through the day use area, including to the edge of the creek near the water play area.
- Construct a rustic open amphitheater for up to 50 people adjacent to the lower day use picnic area for interpretive and educational programs.
- Remove current group picnic area and move all day use functions to the lower area.
- Install up to three small shade shelters and one large group shelter in lower portion of day use area.

Trailhead

- Improve the Lower Calf Creek Fall Trailhead access and reduce erosion by replacing stone stairs, stabilizing erosion prone areas, and relocating trailhead kiosk and register if needed.

Misc. Site Elements

- Install barriers (i.e. boulders and/or rail fencing) as needed to define areas and prevent vegetation and soil trampling.
- Install directional, informational, and interpretive signage as necessary.
- Replace all fabricated block retaining walls with natural stone walls.
- Plant cottonwood trees and other riparian vegetation in the lower day use area and along the creek as necessary. Plant or seed using native plants in disturbed areas outside the riparian zone.

See Appendix D of EA for Conceptual Design – Page C505 and C506.

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 will be developed to comprehensively address installation of signs at the campground and trailhead.

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

- Natural or natural-appearing materials will be used. These could include concrete, natural stone, road base, gravels or fines, rusted or painted metal, and/or wood.
- Natural palette colors will include blacks, grays, reds, rusts, browns, and buffs. No bright colors such as whites or yellows will be used (except for lettering on signs).

- Native plant container stock and/or native plant seeds will be used to re-vegetate areas impacted during construction. Where practical, native plants that need to be removed during construction will be replanted in areas where re-vegetation is needed.

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

- The historic features at Calf Creek Recreation Area has included a thorough architectural and photographic documentation of the historic features, including the shade shelters, and day-use facilities.
- To prevent the spread of invasive and noxious weeds, the equipment used will be washed before transport to the construction site.
- The project site will be monitored for noxious and invasive vegetation after construction. If noxious weeds or non-native, invasive plants are discovered, weed treatments will be applied in a manner consistent with current BLM policy.
- Heavy equipment use will be avoided during wet conditions to reduce the compaction of soils.
- Erosion and sediment control structures will be used during construction to mitigate soil loss due to runoff. Erosion and sediment control structures will remain in place until gravel is laid down on the upper parking area and the area around the constructed parking area has been revegetated.
- Mexican Spotted Owls (MSO) have been observed in the Calf Creek Tributary on several occasions. Nesting has never been confirmed and are thought to be migrants. There is no Protected Activity Center for MSO established in this area. Due to the cliff nature of Calf Creek, it has been determined that there is potential for nesting habitat in this area. To avoid impacts to nesting MSO due to project activity and noise, certain proposed improvements, will occur only between September 1 and February 28 (See Appendix A of the FONSI).
- For certain proposed improvements a survey for migratory birds during nesting season (April 1-August 31) will be completed immediately before activities, a maximum of seven to ten days prior, the minimum preference is 24 hours. At least a 100-foot buffer for active nests is generally recommended and ground-disturbing activities will be postponed until the birds have fledged and are no longer dependent on the nest (See Appendix A of the FONSI). Confirmation that all young have fledged will be made by a qualified biologist before the restriction within the buffer is lifted.

The construction of improvements proposed in the Preferred Alternatives will occur in phases over several years. Construction of the first phase could occur as soon as fall 2017. During construction the recreation area access road and parking will be closed to the public for overnight and day use including trailhead access for the Lower Calf Creek Falls Trail. When it is possible for the public to safely access the site during construction, it will be allowed. Construction closures will potentially last several weeks at a time.

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

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

A variety of heavy, motorized equipment will be used during construction, including but not limited to a dump truck, crane, front-end loader, skid-steer loader, and tractor.

The authority for my decision is contained in the multiple-use mandate of the Federal Land Policy and Management Act (FLPMA). The FLPMA instructs BLM to manage public lands and their various resource values to take into account the long-term needs of future generations for renewable and non-renewable resources.

My decision is in conformance with the *Grand Staircase-Escalante National Monument Management Plan* (MMP) which became effective February 2000. The project area is in the Passage Zone where facilities are allowed for safety, interpretation, and the protection of Monument resources. The MMP includes the following relevant decisions:

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

FAC-8 *As the focal point for visitation, visitor day-use facilities and signs will be added as necessary for visitor use, safety, and the protection of sensitive resources, in addition to existing facilities. These facilities could include pullouts, parking areas, trailheads, trails, toilets, fences, and picnic areas. Day-use areas could include vault toilets, picnic tables, interpretive kiosks, and in some cases, interpretive trails which will be universally accessible but not paved.*

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

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). Calf Creek Campground is listed in the *GSENM Management Plan* as one of "the only developed campground(s)" in the Frontcountry Zone. The proposed actions would maintain and improve this existing development.

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*. Uses or facilities within WSAs should be temporary and not create any new surface disturbance.

My decision is also consistent with the *Garfield County General Management Plan* (1998, updated 2010) *which includes the following 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.

II. FINDING OF NO SIGNIFICANT IMPACT

I have reviewed the direct, indirect, and cumulative effects of the proposed activities documented in the EA for the Calf Creek Recreation Area Site Improvements Project. I have also reviewed the Finding of No

Significant Impact (FONSI) and the project record for this analysis. I have determined that improving and upgrading the facilities at this location as described in the EA will not significantly affect the quality of the human environment. Accordingly, I have determined that the preparation of an Environmental Impact Statement is not necessary.

III. OTHER ALTERNATIVES CONSIDERED

Chapter 2 of the EA describes two Alternative Proposed Actions, Alternative A and Alternative B, and the No Action Alternative. No other alternatives were analyzed in detail because the project entails improving and upgrading existing facilities within the existing footprint of disturbance.

IV. PUBLIC INVOLVEMENT

Notification of the availability of the EA for a 35-day comment period was mailed to 102 individuals and organizations. The comment period began on December 28, 2016 and ended on February 1, 2017. Notification of the availability of the EA for review was also posted on the BLM NEPA Register ePlanning on December 28, 2016 and a press release was printed in *The Garfield and Wayne Counties Insider*. During the 35-day comment period, BLM received 12 emails or letters from 12 individuals which pertained to issues associated with the proposed designs such as;

- Project timing,
- Purpose and need and existing conditions,
- BLM project team,
- Prioritization of funding,
- Competition with local businesses,
- User conflicts,
- Party size in camp units,
- Large group camp site,
- Walk-in sites,
- Historic structure,
- Fee Stations,
- Amphitheater,
- Retaining walls,
- Trash collection
- Concerns with the fee station placement, construction of the amphitheater, and retaining walls,
- And prioritization of funding

In response to public comment these actions will not be included in this Decision Record; the one vehicle per campsite limit, the removal of the historic vault toilet rock structure, this structure will remain, and the removal of asphalt near two campsites.
The tent pad designs were modified to be flush with the ground and range in size from 12’x12’ to 16’x16’. Exceptions below this range could be necessary in the small sites like #7.

V. APPEALS

This decision may be appealed to the Interior Board of Land Appeals (IBLA), Office of the Secretary, in accordance with the regulations contained in 43 CFR Part 4. Any appeal must be filed within 30 days of this decision. Any notice of appeal must be filed with Cindy Staszak, the Monument Manager, 69 South Highway 89A, Kanab, Utah 84741. The appellant shall serve a copy of the notice of appeal and any statement of reasons, written arguments, or briefs on each adverse party named in the decision, not later than 15 days after filing such document (see 43 CFR 4.413(a)). Failure to serve within the time

required will subject the appeal to summary dismissal (see 43 CFR 4.413(b)). If a statement of reasons for the appeal is not included with the notice, it must be filed with the IBLA, Office of Hearings and Appeals, U. S. Department of the Interior, 801 North Quincy St., Suite 300, Arlington, VA 22203 within 30 days after the notice of appeal is filed with the Cindy Staszak, the Monument Manager.

Notwithstanding the provisions of 43 CFR 4.21(a)(1), filing a notice of appeal under 43 CFR Part 4 does not automatically suspend the effect of the decision. If you wish to file a petition for a stay of the effectiveness of this decision during the time that your appeal is being reviewed by the Board, the petition for a stay must accompany your notice of appeal.

A petition for a stay is required to show sufficient justification based on the following standards:

(1) The relative harm to the parties if the stay is granted or denied;
(2) The likelihood of the appellant's success on the merits;
(3) The likelihood of immediate and irreparable harm if the stay is not granted; and
(4) Whether the public interest favors granting the stay.

In the event a request for stay or an appeal is filed, the person/party requesting the stay or filing the appeal must serve a copy of the appeal on the Regional Solicitor's Office, Wallace F. Bennett Federal Building, 125 South State Street Mailstop 201, Salt Lake City, UT 84138.

Cynthia Staszak _____ 6/16/17 _____

Cynthia Staszak
Monument Manager
Grand Staircase-Escalante National Monument

Date

FOIA001:01680112

BLM

United States Department of the Interior
Bureau of Land Management

Environmental Assessment
DOI-BLM-UT-0300-2015-0040-EA

June 2017

Calf Creek Recreation Area Site Improvements

Location: Along Highway 12
16 miles east of Escalante, Utah and 13 miles west of Boulder, Utah
Salt Lake Meridian, Garfield County, Utah
Township 35 South, Range 4 East, Section 1

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

NATIONAL CONSERVATION LANDS

DOI-2020-08 01826

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Calf Creek Recreation Area Site Improvements
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CHAPTER 1
INTRODUCTION AND NEED FOR THE ACTION ALTERNATIVES

INTRODUCTION AND BACKGROUND

The Bureau of Land Management proposes to update and improve the developed portions of Calf Creek Recreation Area in Grand Staircase-Escalante National Monument (GSENM) in order to address site limitations primarily due to impacts from increased visitation as well as improve the visitor experience. Two alternatives are being considered for implementation, one that includes modest improvements and one that includes expanded improvements. See Appendix B Project Area Map for project location and area. The recreation area is located along Highway 12 between Escalante and Boulder, Utah in Garfield County. The project area is approximately 20 acres, includes the Calf Creek Campground and Day Use Area, as well as the Lower Calf Creek Falls Trailhead, and is in the Monument's Frontcountry Management Zone. This developed portion of the Calf Creek Recreation Area is the most visited site on GSENM.

Recreational facilities at Calf Creek were initially constructed in 1962-1963 under authorization of an Accelerated Public Works Program. Those facilities included nine camping units, a group picnic area, bridges, toilets, roads, and a water system. Facilities at Calf Creek have been maintained, improved, and expanded since that time, including the construction of the Lower Calf Creek Falls Trail in 1968. The entire Calf Creek Recreation Area is 5,835 acres and was established for its recreational and scenic value by BLM in 1970, under authority of 43 CFR 2070 and the Classification and Multiple Use Act (1964). The *Calf Creek Recreation Area Management Plan* was approved in 1976 that provided uniform management direction for recreational usage and development within the recreation area. The *Calf Creek Recreation Area and Deer Creek Campground Business Plan* was developed with public input in 2013 that implemented a new fee structure and budget to fund future facility and staffing needs at both the campground and day-use site. See Appendix B Calf Creek Recreation Area Map for location and boundaries of recreation area.

Currently, the developed portion of Calf Creek Recreation Area contains the following amenities and site fixtures:

- Thirteen campsites with tables, fire rings, grills, and site numbering posts one campsite also has a shade shelter
- A camp host site connected to utilities (electricity, water, septic)
- Two group day use areas one with tables, a fire ring, and a food prep area and the other with two shade shelters, tables, grills, and fire rings

- Paved parking for approximately 30 automobiles that serves the day use area, trailhead, and nearby walk-in campsites
- A water play area in Calf Creek
- A restroom building with flush toilets connected to a septic system
- Two vault toilets (one has not been used in years)
- A pedestrian suspension bridge
- A fee station with fee tube and bulletin boards
- A trailhead register and kiosk at the beginning of the Lower Calf Creek Falls Trail
- A paved site road; a bridge and a concrete low water crossing
- A chlorinated culinary water system with five hydrants
- Site signage
- Fabricated block retaining walls
- Post and rail fencing

The development and maintenance of facilities at the recreation site was addressed in prior planning efforts. Those include:

- *GSENM Trail/Trailhead Maintenance/Restoration EA (UT-048-98-015, 1998)*
  BLM approved the maintenance and restoration of existing trails and trailheads in the Escalante area of GSENM, including Lower Calf Creek Falls Trail and Trailhead.

- *GSENM Calf Creek Campground Maintenance and Improvements CX (UT-048-98-016, 1998)*
  BLM approved installing a new fee station, repairing masonry steps near the water play area, pruning and removing vegetation around campsites and roadway, and installing a buried electric line.

- *GSENM Calf Creek Campground Maintenance and Improvements CX (UT-030-99-020, 1999)*
  BLM approved constructing a block retaining wall around the day use parking area, replacing all faucets and drains, insulating the water line, and filling in the old spring box.

- *GSENM Calf Creek Recreation Area Water System Replacement EA (DOI-BLM-UT-0300-2009-0008-EA, 2009*
  BLM approved the installation/replacement of approximately 3000 feet of poly waterline and five hydrants with ADA-compliant pump handles to protect human health and safety and improve accessibility.

If approved, BLM deferred maintenance funds and recreation site user fees would be used to complete the proposed improvements; many of which would be constructed only during the fall and winter months (September through March) beginning in 2017, though others would be implemented in subsequent years as funding allows.

PURPOSE AND NEED FOR THE ACTION ALTERNATIVES

The purpose of the action alternatives is to update recreation facilities, improve site access, enhance the recreational experience for visitors, and provide better long-term protection to riparian resources within the developed portion of Calf Creek Recreation Area. These would be accomplished by replacing old, deteriorated site amenities, providing additional parking and campsites, improving vehicular circulation, and improving universal accessibility and safety throughout the site.

At Calf Creek Recreation Area the existing day use parking capacity exceeds the current footprint during much of the visitation season. The parking overflow leads visitors to park along the entrance road and highway creating traffic flow and safety issues as well as damage to vegetation and soils. The campground is filled to capacity during much of the visitation season with a limited amount of associated parking space. For a number of years, overflow and last minute dispersed tent camping has also been allowed in an open disturbed area adjacent to the lower day use picnic area, which has led to an expanding footprint of disturbed vegetation and soils. Tables in the day-use picnic area are then occupied or surrounded by dispersed tent campers.

The wooden pedestrian suspension bridge has rotted handrails and loose lateral bracing underneath the deck that needs repair. Conduit housing a power line is attached to the bottom of the bridge and has broken because of the bridge shifting. The three existing shade shelters that were constructed in the 1960s with metal overhangs do not provide the proper overhead clearances to meet current building codes and have concrete footers that are increasingly unstable**.** The retaining wall along the creek by the water play area was damaged by a flood event such that it has slumped and blocks regularly dislodge and fall into the creek, creating hazards for those walking near the edge of the creek and for those wading and playing in the creek. The low water crossing through Calf Creek in the back of the campground is slippery and motorcycles as well as pedestrians have fallen while crossing it. Contamination to the creek from the undercarriage of vehicles crossing through the creek has also occurred for decades.

Some facilities are deteriorating, create safety concerns, and do not meet the *Architectural Barriers Act Accessibility Guidelines for Outdoor Developed Areas*. The comfort station, vault toilet, and several of the campsites are some examples of features that do not meet accessibility guidelines.

DECISION TO BE MADE

The BLM must decide whether to make improvements at the Calf Creek Campground Recreation Site to better accommodate recreation needs. The proposed actions need to be consistent with the Monument Management Plan and other regulations.

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-8 *As the focal point for visitation, visitor day-use facilities and signs will be added as necessary for visitor use, safety, and the protection of sensitive resources, in addition to existing facilities. These facilities could include pullouts, parking areas, trailheads, trails, toilets, fences, and picnic areas. Day-use areas could include vault toilets, picnic tables, interpretive kiosks, and in some cases, interpretive trails which will be universally accessible but not paved.*

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

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 12 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. It 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.

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.

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.

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 properties that are included in 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 and associated tributaries 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). Calf Creek is a tributary of the Escalante River and was inventoried and recommended suitable for inclusion in the NWSRS as required by Section 5(d) (1) of the WSRA. It is managed to retain its eligibility for possible designation as part of the NWSRS.

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.

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). Calf Creek Campground is listed in the *GSENM Management Plan* as one of

"the only developed campground(s)" in the Frontcountry Zone. The proposed actions would maintain and improve this existing development.

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*. Uses or facilities within WSAs should be temporary and not create any new surface disturbance.

*BLM Manual 6400 - Wild and Scenic Rivers - Policy and Program Direction for Identification, Evaluation, Planning and Management (*2012*)*
BLM's policy goal for management of inventoried suitable Wild and Scenic River segments is to manage and maintain their free-flowing condition, water quality, tentative classification, and any identified outstanding remarkable values (ORV) until designated or released in a subsequent land use plan. *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.

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.

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. FLREA also established the America the Beautiful Interagency Pass program.

Calf Creek Recreation Area and Deer Creek Campground Business Plan (2014)
The Business Plan was developed by the BLM and approved by the Utah Recreation Advisory Council in 2014. The proposed action in this EA is consistent with the vision of expenditures of campground fee program revenues which are to be directed towards improving facilities and providing enhanced visitor services at Calf Creek Recreation Area.

The Business Plan also included project priorities for future health and safety upgrades proposed in this EA.

Garfield County General Management Plan (2007)
Although Calf Creek Recreation Area is 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 expanding recreational opportunities on page 42:

"…GSENM needs to expand recreation, economic, scientific, and cultural opportunities and increase beneficial uses for residents and visitors of Garfield County to the maximum extent possible."

IDENTIFICATION OF ISSUES

Issue 1: Cultural Resources

- How would the proposed improvements affect the identified historic sites 42Ga8060, 42Ga6091, 42Ga1431, and what mitigation measures might be required?
- Are there other sites in the vicinity that might also be affected?

Issue 2: Floodplains

- How would the proposed low water crossing and stream bank restoration and the water play area impact floodplains?

Issue 3: Hydrologic Conditions

- How would the proposed parking upgrades at Calf Creek Recreation Area impact hydrologic conditions?

Issue 4: Recreation

- How would the proposed facility upgrades and improvements at Calf Creek Recreation Area affect the recreational opportunities or experience of visitors?

Issue 5: Soils

- How would the proposed parking upgrades at Calf Creek Recreation Area impact soils?

Issue 6: Water Resources

- Would the proposed upgrades at Calf Creek Recreation Area create long-term impacts to water resources (quality and quantity)?

Issue 7: Wetlands/Riparian Zones

- Would the proposed project affect riparian vegetation?

Issue 8: Wild and Scenic Rivers

- Would the proposed facility developments at Calf Creek Recreation Area affect the wild and free flowing nature, water quality or any of the identified outstanding remarkable values of Calf Creek and have any impact to long-term suitability of Calf Creek for designation in the National Wild and Scenic Rivers System?

Issue 9: Visual Resources

- Would the proposed site developments create visually contrasting impacts that alter the landscape character?
- Would the proposed site developments meet the VRM Class II objectives?

Issue 10: Vegetation excluding USFWS designated species

- Would the proposed project affect vegetation?

CHAPTER 2
DESCRIPTION OF ALTERNATIVES

INTRODUCTION

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

ACTIONS COMMON TO BOTH ACTION ALTERNATIVES

BLM is proposing to upgrade and improve facilities within the Calf Creek Recreation Area. GSENM would use BLM deferred maintenance and recreation use fees to pay for the proposed improvements. Contractor, BLM force account and maintenance staff, and/or volunteer labor could be used to perform the work. The recreation site is approximately 20 acres. The construction of improvements proposed in both Action Alternatives would likely occur in phases over several years. Construction of the first phase could occur as soon as fall 2017.

Both Action Alternatives include the following (See Appendix D for Conceptual Site Designs):

Parking and Driveway

- Widen site road up to 20 feet wide and repair/replace the driveway bridge.
- Replace low-water crossing with low, end-to-end, open-bottomed concrete culverts.
- Construct overflow parking for up to 20 standard size vehicles near the entrance from Highway 12.
- Construct additional parking for up to 10 standard size vehicles on east side of site road between creek and site sign.

- Reclaim insufficiently sized parking space adjacent to Site #1 (parking for walk-in sites #1 thru #4 would be in main parking area).

Toilets

- Remove and replace vault toilet on east side of campground in same location and install new sidewalk.

Campground

- Remove old concrete pad and construct two walk-in sites in same location.
- Convert existing site closest to east side of pedestrian bridge to parking for three walk-in sites.
- Reconfigure site #12 to locate tent pad away from the creek.
- Install base material to raise, define, and improve surface stability of campsites.
- Upgrade all existing campsites with flush with the ground tent pads, new fire rings, and tables (as needed some tables can be reused).
- Replace shade shelters at site #10 and install new shade shelters at sites #9 and #13.
- Replace campsite numbering posts.
- Repair wooden suspension pedestrian bridge by replacing all timber components.
- Remove electrical conduit from underside of pedestrian bridge and place it inside the abandoned metal water line piping that is supported above the creek but below the bridge.
- Reconfigure camp host site at/near the existing location.

Day Use

- Replace the main self-pay fee station (See Appendix D for Conceptual Design Page C503 and C504) and construct a second small self-pay fee station.
- Construct natural stone retaining walls that are engineered to stabilize the streambank and provide access to the creek (See Appendix D for Conceptual Design Page C502).
- Construct universally-accessible but unpaved walkways through the day use area, including to the edge of the creek near the water play area.
- Construct a rustic open amphitheater for up to 50 people adjacent to the lower day use picnic area for interpretive and educational programs.

Trailhead

- Improve the Lower Calf Creek Fall Trailhead access and reduce erosion by replacing stone stairs, stabilizing erosion prone areas, and relocating trailhead kiosk and register if needed.

Misc. Site Elements

- Install barriers (i.e. boulders and/or rail fencing) as needed to define areas and prevent vegetation and soil trampling.
- Install directional, informational, and interpretive signage as necessary.

- Replace all fabricated block retaining walls with natural stone walls.
- Plant cottonwood trees and other riparian vegetation in the lower day use area and along the creek as necessary. Plant or seed using native plants in disturbed areas outside the riparian zone.

During construction the recreation area access road and parking could be closed to the public for overnight and day use including trailhead access for the Lower Calf Creek Falls Trail. When it is possible for the public to safely access the site during construction, it would be allowed. Construction closures could potentially last several weeks at a time when the ground is not frozen during fall and winter months (September through March) to prevent impacts to Mexican Spotted Owls (MSO) and migratory birds. Some proposed improvements would be allowed during March 1 to August 31 and a survey for migratory birds would occur immediately before the activities, within seven to ten days prior (See appendix A in the FONSI). 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. Throughout construction, equipment would be parked at the project site and contractors, if used, would have the option of camping onsite.

Once construction is completed, general maintenance would be performed. Overnight camping would continue to be allowed only in designated campsites as consistent with federal regulations for developed recreation sites and would not be allowed in the day use or parking areas.

Under both action alternatives, *BLM's Guidelines for a Quality Built Environment* are being 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) are also being used to plan and 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.
- 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 re-vegetate areas impacted during construction. Where practical, native plants that need to be removed during construction would be replanted in areas where re-vegetation is needed.

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

- The historic features at Calf Creek Recreation Area would consist of thorough architectural and photographic documentation of the historic features, including the shade shelters, and day-use facilities.
- To prevent the spread of invasive and noxious weeds, the equipment used 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.
- Heavy equipment use would be avoided during wet conditions to reduce the compaction of soils.
- Erosion and sediment control structures would be used during construction to mitigate soil loss due to runoff. Erosion and sediment control structures would remain in place until gravel is laid down on the upper parking area and the area around the constructed parking area has been revegetated.
- Mexican Spotted Owls (MSO) have been observed in the Calf Creek Tributary on several occasions. Nesting has never been confirmed and are thought to be migrants. There is no Protected Activity Center for MSO established in this area. Due to the cliff nature of Calf Creek, it has been determined that there is potential for nesting habitat in this area. To avoid impacts to nesting MSO due to project activity and noise, certain proposed improvements, would occur only between September 1 and February 28 (See Appendix A of the FONSI).
- For certain proposed improvements a survey for migratory birds during nesting season (April 1-July 1) would be completed immediately before activities, no more than seven to ten days prior. At least a 100-foot buffer for active nests is generally recommended and ground-disturbing activities would be postponed until the birds have fledged and are no longer dependent on the nest (See Appendix A of the FONSI).

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

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

ACTIONS IN ALTERNATIVE A (MODEST IMPROVEMENTS)

In addition to the items noted in Common to All Action Alternatives, Alternative A includes the following (See Appendix D for Conceptual Site Designs Page C101):

- Replace two small shade shelters in lower portions of the day use area (See Appendix D for Conceptual Site Designs Page C506).

ACTIONS IN ALTERNATIVE B (EXPANDED IMPROVEMENTS)

In addition to the items noted in Common to All Action Alternatives, Alternative B includes the following (See Appendix D for Conceptual Site Designs Page C201):

- Reconfigure the main parking area to increase capacity to approximately 50 spaces.
- Remove the existing flush toilet building and construct a new one in a different location.
- Remove current group picnic area and move all day use functions to the lower area.
- Install up to three small shade shelters and one large group shelter in lower portion of day use area (See Appendix D for Conceptual Design Page C505 and C506).

COMPARISON OF ACTION ALTERNATIVES

The following table provides a comparison on the proposed improvements included in both or either Action Alternative.

Table 2.1

PROPOSED IMPROVEMENT	Alt A	Alt B
Parking and Driveway		
Widen site road up to 20 feet wide and repair/replace driveway bridge.	x	x
Replace low-water crossing with low, end-to-end, open-bottomed concrete culverts.	x	x
Construct overflow parking for up to 20 standard size vehicles and a small fee station near the entrance from Highway 12.	x	x
Construct additional parking for up to 10 standard size vehicles on east side of site road between creek and site sign.	x	x
Reclaim insufficiently sized parking space adjacent to Site #1 ((parking for walk -in sites #1 thru #4 would be in main parking area).	x	x
Reconfigure the main parking area to increase capacity to approximately 50 spaces.		x
Toilets		
Remove and replace vault toilet on east side of campground in same location and install new sidewalk.	x	x
Remove the existing flush toilet building and construct a new one in a different location.		x
Campground		
Remove old concrete pad and construct two walk-in sites in same location.	x	x
Convert existing site closest to east side of pedestrian bridge to parking for three walk-in sites.	x	x
Reconfigure site #12 to locate tent pad away from the creek.	x	x
Install base material to raise, define, and improve surface stability of campsites.	x	x

Upgrade all existing campsites with tent pads, new fire rings, and tables (as needed – some tables can be reused).	x	x
Replace shade shelters at site #10 and install new shade shelters at sites #9 and #13.	x	x
Replace campsite numbering posts.	x	x
Repair wooden suspension pedestrian bridge by replacing all timber components.	x	x
Remove electrical conduit from underside of pedestrian bridge and place it inside the abandoned metal water line piping that is supported above the creek but below the bridge.	x	x
Reconfigure camp host site at/near the existing location.	x	x
Day Use		
Replace the main self-pay fee station and construct a second small self-pay fee station.	x	x
Construct natural stone retaining walls that are engineered to stabilize the streambank and provide access to the creek.	x	x
Construct universally-accessible but unpaved walkways through the day use area, including to the edge of the creek near the water play area.	x	x
Construct amphitheater for up to 50 people in day use area for interpretive and educational program use.	x	x
Replace two small shade shelters in lower portions of the day use area.	x	
Remove current group picnic area and move all day use functions to lower area.		x
Install three small, single-party shade shelters and one large group shelter in lower portion of day use area.		x
Trailhead		
Improve hiking access and reduce erosion at the Lower Calf Creek Fall Trailhead by replacing stone stairs, stabilizing erosion prone areas, and relocating trailhead kiosk and register if needed.	x	x
Miscellaneous Improvements		
Install barriers (i.e. boulders and/or rail fencing) as needed to define areas and prevent vegetation and soil trampling.	x	x
Install directional, informational, and interpretive signage as necessary.	x	x
Replace all fabricated block retaining walls with natural stone walls.	x	x
Plant cottonwood trees and other riparian vegetation in the lower day use area and along the creek as necessary. Plant or seed using native plants in disturbed areas outside the riparian zone.	x	x

NO ACTION ALTERNATIVE

Under the No Action Alternative, BLM would not improve and update the Calf Creek Recreation Area. The BLM would not provide any of the improvements or facilities proposed in the Action Alternatives. Under this alternative the old vault toilet and shade shelters would not be replaced; access to the water play area would not be improved; additional parking and/or camping would not be provided; and universal accessibility throughout the site 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 A 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. Cultural Resources, Floodplains, Hydrologic Conditions, Recreation, Soils, Wetlands/Riparian Zones, Wild and Scenic Rivers, and Visual Resources were identified by the Interdisciplinary Team as potentially affected by the Action Alternatives.

A brief environmental setting description of the Calf Creek Recreation Area is as follows:

- **Physiographic Province**: Colorado Plateaus (Escalante Canyons)
- **Elevation**: 5,300’
- **Geology**: Early Jurassic Kayenta and Navajo formations; predominantly medium sandstone
- **Ecological Site**: Semi-wet Fresh Streambank
- **Hydrology**: Calf Creek flows into the Escalante River, which then empties into Lake Powell and the Colorado River system
- **Soil Type**: Riverwash, fine sandy loam
- **Landform**: Deep sandstone canyon with riparian area in bottom
- **Typical uses**: Recreational (hiking, camping, picnicking)
- **Wild and Scenic Rivers – Suitable Segments**: Calf Creek- 2-Scenic, Calf Creek-3 Recreational
- **Wilderness Study Areas**: Adjacent to Phipps-Death Hollow WSA
- **Visual Resource Management**: Classes II

Calf Creek Recreation Area is located along Highway 12 and adjacent to Calf Creek, a tributary of the Escalante River. The project area is 5,300 feet above sea level and is located within Calf 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. The recreation area is physically constrained by the highway, the creek and flood plain, sandstone cliffs, and a wilderness study area boundary.

Resource A: Cultural Resources

The cultural resources area of analysis is centered on the Calf Creek Campground, but extends along the drainage from the confluence of Calf Creek and the Escalante River upstream to Lower Calf Creek Falls. Within this corridor are numerous archaeological sites, the large majority of which are rock art panels. None of these sites downstream (towards the confluence) would be threatened or adversely effected, as there is little foot traffic in that direction and no vehicle pullouts. Sites located upstream, between the campground and the Lower Calf Creek Falls, would continue to see visitation. This area already sees significant visitation, and the proposed improvements would not increase this visitation. Sites along this corridor are monitored by GSENM staff as well as by the Grand Staircase-Escalante Partners site Steward Program.

Both the Calf Creek Campground and the old Escalante to Boulder road are documented historic properties considered to be eligible to the National Register. Calf Creek Campground, site 42Ga8060, was established in 1963 and contains interesting architectural features and elements that would be directly impacted or entirely removed under the action alternatives. These features include shade shelters constructed on-site utilizing materials reportedly salvaged from nearby mining and/or drilling operations and a toilet structure and day-use facilities constructed using native field stone. Both construction techniques are not widely seen in our current more industrialized and technologically advanced society, and these architectural structures contribute to the site's eligibility to the National Register under criterion C in that they "embody distinctive characteristics of a type, period, or method of construction…"

The old Escalante to Boulder road is a CCC construction completed in 1940 and has been recorded as 42Ga6091, and is considered eligible to the NRHP. The old Escalante to Boulder road provided predictable, year-round vehicular access to the community of Boulder. This was the last community in the continental US to see such access. The road contains some interesting constructed features, such as the native stone retaining walls visible immediately above Calf Creek Campground. This site is considered eligible to the National Register under criterion A in that is "…associated with events that have made a significant contribution to the broad patterns of our history," and again under criterion C for similar reasons as Calf Creek Campground.

One other cultural resource site, 42Ga1431, is located in the immediate vicinity of the campground. This is a small rock art panel located some five meters above the campground, and would not be adversely affected by the proposed action alternatives. Calf Creek Campground also contains features of a non-historic nature, such as the current toilet facility constructed in the 1980s and the previously replaced timber elements of the footbridge; loss of these features and the replacement of the bridge timber elements are not considered an issue under cultural resource analysis.

Resource B: Floodplains

The analysis area for floodplains is the Calf Creek Campground (20 acres). The floodplain consists of river wash and alluvial sand. The proposed project area includes a concrete low-water stream crossing of Calf Creek at the upstream end of the project area and a water play area along approximately 60 feet of the floodplain adjacent to Calf Creek near the day-use area. The low-water crossing is a submerged concrete pad that spans the width of the stream cross-section. The low-water crossing allows vehicles to ford the stream to reach campsites on the east side of Calf Creek.

The water play area is a small area adjacent to Calf Creek that allows swimmers and waders access to the creek. Fabricated red blocks are used as for stream bank re-enforcement on the west side of Calf Creek.

Resource C: Hydrologic Conditions

The analysis area for hydrologic conditions is the Calf Creek Campground (20 acres). Soils within the analysis area range from poorly drained in the stream bottom to moderately well drained and excessively drained on stream terraces and sand sheets, respectively. Calf Creek Campground includes approximately 0.87 acres (0.60 miles) of paved road and a 0.34 acre parking area where hydrologic conditions have been altered. Highway 12, a paved road, also runs adjacent to the campground. Social trails lead to the Lower Calf Creek Falls trailhead sign and register box creating compacted soils.

The proposed project area includes an abandoned road cut near the entrance to the campground where the overflow parking lot would be constructed. Soils on the area proposed for the overflow parking area are shallow (i.e., < 20 inches to bedrock), fine sand and sandy loam on 15-50% slopes, and therefore are prone to runoff.

Resource D: Recreation

The analysis area is the Calf Creek Recreation Area, it is the most visited recreation site in the Monument receiving roughly 40,000 visitors annually as people flock to its lush riparian setting in the midst of the sandstone canyons. Calf Creek Recreation Area also provides a public toilet facility along the 28-mile stretch connecting Escalante and Boulder. The scenic overlooks along Highway 12 within GSENM are estimated to receive more than 325,000 visitors annually. Some percentage of these travelers utilizes the restrooms at Calf Creek Recreation Area, although statistics are not available for this specific use. The recreation area offers a developed recreational site with culinary water and clean, maintained

restrooms in the northern reaches of the Monument and is accessible via a paved road. Popular recreation uses at Calf Creek include hiking, camping, picnicking, fishing, water play, photography, and bird watching.

During 2016, BLM collected 2,217 fee permits for a total of 6,208 campers in the campground. More than 96% of the campground permits issues were for parties of six or fewer people, and parties of two were the most common at 52% of total permits. The campground's daily occupancy is at or exceeds capacity from April into October. In 2016 BLM collected 9,280 day use fee permits for a total of 25,904 visitors. 97% of the day use permits issues were for parties of six or fewer people, and parties of two were the most common at 62% of total permits. The shaded picnic site near the fee station is used primarily by individual groups. Although it is available for advance reservation for group use of 50-75 people, there is little demand for group use and during the past 5 years, the day-use picnic site has been reserved only 2-4 times per year.

In 2016, foot counters at Lower Calf Creek Falls Trail recorded 36,437 hikers. Current day-use parking is primarily by destination visitors who spend 3-4 hours hiking the Lower Falls Trail. The trail to Lower Calf Creek Falls enters Phipps-Death Hollow Wilderness Study Area at the trailhead and is the only maintained trail on the Monument. The six-mile round trip hike ends at the spectacular 126-foot Lower Calf Creek waterfall. The waterfall is regarded as a must-see for visitors to the area and is popular for locals who bring friends or family to view the waterfall. It is also popular for large organized groups of young people from universities and scout groups who trek to visit the Lower Falls. The trail features wooden numbered posts that correspond to a free interpretive trail guide available at the trail register. Current use on the trail during peak months is often 300-500 people on the trail at one time and 150 people at Lower Calf Creek Falls itself.

The infrastructure at the trailhead includes one trailhead sign and a register box for interpretive brochures. The register box is located about 15 feet from the beginning of the trail which begins off the edge of the campground road. The location for the trailhead sign is on a slope with physical space for only one or two people to view the sign at one time. Social trails lead up to the trailhead sign and register box creating erosion and compacted soil.

During high visitation times, especially holidays, the available day use parking capacity and road sides experience congestion with partial blocking of access and GSENM staff and volunteers must direct traffic from the highway at the top of the access road.

Resource E: Soils

The analysis area for hydrologic conditions is the Calf Creek Campground (20 acres). Soils along the canyon bottom primarily consist of alluvial sand and riverwash. Navajo sandstone rock outcrops are predominate along the cliff walls within the campground. Calf Creek Campground includes approximately 0.87 acres (0.60 miles) of paved road and a 0.34 acre parking area where soils have been compacted. Highway 12, a paved road, also runs

adjacent to the campground. Social trails lead up to the Lower Calf Creek Falls trailhead sign and register box creating compacted soils. The proposed project area includes an abandoned road cut near the entrance to the campground where the overflow parking lot would be constructed. Soils on the area proposed for the overflow parking areas are shallow (< 20 inches to bedrock), fine sand and sandy loam on 15-50% slopes, and therefore are prone to runoff and erosion.

Resource F: Water Resources

The analysis area for water resources is the Calf Creek Campground (20 acres). Calf Creek Campground includes approximately 0.87 acres (0.60 miles) of paved road and a 0.34 acre parking area where runoff drains into Calf Creek. Highway 12, a paved road, also runs adjacent to the Calf Creek Campground and runoff from the highway drains to Calf Creek. Vehicles park in undesignated areas on the side of the highway and the campground road, which compacts the soil and increases runoff in those areas. Runoff from compacted areas transports sediment another pollutants to Calf Creek. Social trails lead to the Lower Calf Creek Falls trailhead sign and register box creating compacted soils which are prone to runoff and erosion.

The proposed project area includes approximately 1500 stream feet of Calf Creek that flows through Calf Creek Campground. Calf Creek and its tributaries to the confluence of the Escalante River (approximately 8 stream miles) are listed on the EPA 303(d) list as not supporting water quality criteria for temperature.

The proposed project includes a concrete low-water stream crossing of Calf Creek at the upstream end of the project area; currently vehicles cross the stream to access camp sites on the east side of Calf Creek. A water play area along approximately 60 feet of floodplain is adjacent to Calf Creek near the day-use area. There is a retaining wall that was damaged by recent flooding next to the water play area and an access trail that descends a steep slope down to the water play area. Above the campground an abandoned road cut exists where an overflow parking lot would be constructed.

Resource G: Wetlands/Riparian Zones

The wetland/riparian area of analysis is the valley bottom of the entire Calf Creek drainage where riparian vegetation grows. Visitation within this drainage occurs above the Upper Falls to the confluence with the Escalante River. The primary area of visitation is the campground and the trail to the Lower Falls. The campground, where many improvements are proposed, is within the riparian zone.

The riparian plant community is continuous along the Calf Creek drainage with outcroppings of rock and sand. Herbaceous riparian vegetation cover is high with woody species that are the dominant plant form. Dominant trees and shrubs include Fremont cottonwood (*Populus fremontii*), Coyote willow (*Salix exigua*), Whiplash willow (*S. lucida* var. *caudata*), Yellow willow (*S. lutea*), Water birch (*Betula occidentalis*), Box-elder (*Acer negundo*), and Skunkbush (*Rhus aromatica*). Dominant herbaceous and graminoid species include sedges

(*Carex* spp.), Arctic rush (*Juncus balticus*), Common reed (*Phragmites australis*), reedgrass (*Calamagrostis* spp.), willow-herb (*Epilobium* spp.), and clover (*Trifolium* spp.)

Invasive Species
No state noxious weeds are present in the riparian area of the project area but two do occur in the Calf Creek tributary. Musk Thistle (*Carduus nutuns*), a Class B species, occurs sporadically along the whole drainage. Salt Cedar (*Tamarisk sp.*), a Class C species and Russian olive (*Eleagnus angustifolia*) have been and are being controlled by efforts made by the Escalante River Watershed Partnership. Cheatgrass (*Bromus tectorum*), puncture vine (*Tribulus terrestris*), ripgut brome (*Bromus diandrus*) and Russian thistle (*Salsola pestifer*) are also invasive species found in the tributary but are not listed as noxious by the State of Utah.

Resource H: Wild and Scenic Rivers
The area of analysis is all of Calf Creek, a spring-fed tributary of the Escalante River flows through the recreation area and was inventoried and found suitable for inclusion in the National Wild and Scenic River System (NWSRS) as required by Section 5(d) (1) of the 1968 Wild and Scenic Rivers Act. Calf Creek is divided into three WSR suitable segments: Segment 1 (wild classification) from headwaters to Lower Falls; Segment 2 (scenic classification) from Lower Falls to the campground; and Segment 3 (recreational classification) from the upper edge of the campground through the campground and day-use site to the confluence with the Escalante River. 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 or tributary. All eight miles of the creek are managed to retain their eligibility for possible designation as part of the 122 miles of the Escalante River and tributaries that are recommended as suitable for inclusion in the NWSRS.

The proposed project area for the Calf Creek Campground and the Lower Falls trailhead lies within the Calf Creek- segment 3 with a tentative classification of recreational. The WSR suitability recommendation also identifies the following Outstanding Remarkable Values (ORVs): high scenic quality, bird habitat, rock art, pre-historic structures, high recreation use and riparian values.

Resource I: Visual Resources
Area of Analysis
The visual resource area of analysis is the developed portion of the Calf Creek Recreation Area including the campground, day use area, and parking for the Lower Calf Creek Falls. The area includes several built elements that have altered the visual environment beginning many decades ago when the road between Escalante and Boulder was constructed, then when the recreation area was initially developed in the 1960s, and the incremental improvements that have been made since then like the addition of the comfort station in the 1980s, to the many vehicles that fill the parking lot and line the driveway on most days of the visitation season today. The built elements that exist today are nestled into the canyon and blend well with the characteristic landscape.

Characteristic Landscape

The proposed project area is located in the northern reaches of the Escalante Canyons physiographic province just off Highway 12 on a narrow canyon floor straddling Calf Creek about a mile before it joins the Escalante River. The Escalante Canyons province is a landscape comprised of dramatic erosional landforms created by the Escalante River and its tributaries. High vertical canyon walls, slot canyons, domes, arches and natural bridges are common features in this landscape. Lush riparian corridors along the river and its tributaries provide contrasts to the expanses of exposed slickrock.

The dominant vegetation in the project area 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 and yellow greens to dark juniper greens to the bright greens associated with cottonwoods and willows; the vegetation ranges from medium to coarse in texture. The built elements in this landscape include the paved highway, site road and parking area, a restroom building, a vault toilet, a large kiosk and fee station, shade shelters, fabricated-block retaining walls, pole fencing, picnic tables, fire rings, and signs. Most of the built elements are screened from view by the riparian vegetation and landforms. The primary elements that draw attention are the paved surfaces and the parked vehicles.

The project area is within an enclosed landscape created by the sandstone landforms that surround it. The predominant lines in this landscape are vertical, horizontal, or rounded as created by landform banding and edges. The highway and site road add distinct bands across the landscape that are created by the removal of vegetation and application of pavement which creates a contrast in color and texture to the existing scene and that directs the eye along their alignments. The riparian corridor also creates a distinct green band. The predominant colors of this landscape are reds, buffs and greens due to the landform and vegetation. The texture of the landscape varies from medium to coarse due to the mixes of vegetation and rugged landforms.

This project is proposed in a dramatic Southern Utah, riparian canyon landscape with exposed red and buff sandstone and riparian vegetation similar to other canyon areas within the Colorado Plateau.

This project area is at a heavily visited recreational development along Highway 12 (a National Scenic Byway). It is used primarily by recreationists who are typically engaged in hiking, camping, picnicking, fishing, bird-watching, and photography. Those travelling along the highway but not visiting the recreation area include byway travelers and local residents. This range of individuals defines the casual observer.

Visual Resource Management Classes and Objectives

The proposed Calf Creek Recreation Area 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.

Resource J: Vegetation excluding USFWS designated species
The vegetation area of analysis is the area within the entire Calf Creek drainage. Visitation within this drainage occurs above the Upper Falls to the confluence with the Escalante River. The primary area of visitation is the campground and the trail to the Lower Falls. The campground, where many improvements are proposed, is primarily within the riparian zone this analysis area includes those upland areas outside of the riparian zone

The upland plant community surrounding the Calf Creek drainage beyond the riparian zone has a low vegetation cover and is dominated by grasses, forbs, and shrubs. The dominant shrub species include rabbit brush (*Ericameria nauseosa*), sagebrush (*Artemesia sp.*), buffalo berry (*Sheperdia rotundifolia*), and Mormon tea (*Ephedra virdis*). Grasses found in the area include sand drop seed (*Sporobolus cryptandrus*), Indian rice grass (*Achnatherum hymenoides*), needle and thread grass (*Hesperostipa comata*), blue grama (*Bouteloua gracilis*), and side oats grama (*Bouteolua curtipendula*). The forbs species include globe mallow (*Sphaeralcea parvifolia*), and tanseyleaf aster (*Machaeranthera canescens*).

Invasive Species
No state noxious weeds are present in the upland area of the project area. Puncture vine (*Tribulus terrestis*), yellow bluestem (*Bothriochloa ischaemum*), cheat grass (*Bromus techtorum*) occupy certain areas within the project area.

Chapter 4

ENVIRONMENTAL IMPACTS

ALTERNATIVE A (MODEST IMPROVEMENTS)

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

Resource A: Cultural Resources
Effects common to both alternatives
Under the action alternatives the Calf Creek Campground would see the loss of the historic shade structures and field stone day-use facilities, as well as the concrete volleyball court (an element without any unique architectural features). The field stone toilet structure would be removed or repurposed. The loss of the shade shelters and toilet facility would be

considered adverse effects under 36CFR 800.5(1), and would require mitigation of some sort as per 36CFR 800.6. As proposed under the action alternatives, part of the old Escalante to Boulder road would be used as an overflow parking area to alleviate congestion at the Calf Creek trailhead. This is seen as a no adverse effect under 36CFR 800.5(d)(1), with potential beneficial effects in that a short portion of the road would be maintained rather than continuing to degrade through natural erosional processes.

Consultation with the State Historic Preservation Officer (SHPO) has been conducted regarding both of these sites. SHPO has concurred with assessments of eligibility on both sites, and a Memorandum of Agreement (MOA) regarding mitigation would be prepared under 36CFR 800.6(b)(1)(iv). Proposed mitigation for the loss of the historic features at Calf Creek Campground would consist of thorough architectural and photographic documentation of the historic features, including the toilet structure, shade shelters, and day-use facilities. No mitigation is considered necessary for the old Escalante to Boulder road in that use of this as a parking area would be a beneficial effect.

Resource B: Floodplains

Effects common to both alternatives

Alternatives A and B include removing the existing concrete pad at the low-water stream crossing and replacing it with a series of end-to-end, open-bottomed concrete culverts. The concrete culverts would allow water to pass underneath the stream crossing during normal flow conditions while also allowing vehicles to cross to the east side of the stream to access campsites without entering the water. Water would flow over the concrete culvert crossing during high flows. Removal of the concrete low-water crossing would restore the stream bed to its natural gravel/cobble bottom state. Construction of the culvert crossing would occur in the disturbed footprint of the current low water crossing and within the current road alignment. The disturbed area for constructing the culvert is approximately 400 ft^2 (approximately 0.05% of the analysis area). There is the potential for the stream to become blocked at the concrete culvert during flood flows that move debris, such as sediment and large trees and limbs. Blocking the flow could cause water to breach the culvert and result in upstream flooding and could result in scouring around the edges of the culvert, and in the worst case scenario, could cause the culvert crossing to be washed out depending on the intensity of the flood event. Material may also be deposited beneath the culvert during moderate to high flows and the area beneath the culvert would need to be maintained so that the stream remains free-flowing after such events. Changing the stream crossing to a culvert crossing would potentially reduce the amount of vehicle related contaminants, such as oil, grease, mud from tires, and brake dust, that are deposited directly into the stream due to vehicles entering the water. Erosion of the road on either side of the stream would also potentially be reduced since vehicles would not be entering and exiting the stream.

Alternatives A and B include removing the existing retaining wall adjacent to the water play area, removing the current walkway down the steep slope, grading the steep slope adjacent to the water play area, and stabilizing the graded slope with a combination of natural stone retaining walls and native trees and riparian vegetation (i.e., cottonwoods). The total

disturbance is approximately 0.10 acres (approximately 0.5% of the project area). There is the potential for the section of slope being graded to erode during construction therefore, design features, such as erosion and sediment control structures, would be used during construction and until the site has been revegetated and/or stabilized with retaining walls. Heavy equipment could cause compaction in the area being graded and efforts would be made to avoid operating heavy equipment during wet conditions. Relocating the current access trail away from the steep slope going down to the creek would reduce erosion due to compaction of the trail. Infiltration capacity is expected to increase once vegetation has established.

Resource C: Hydrologic Conditions

Effects common to both alternatives

Alternatives A and B include constructing an overflow parking area for 20 vehicles near the Highway 12 entrance to Calf Creek Campground and an additional 10 parking spaces between the creek and entrance sign. The total disturbance is approximately 0.70 acres (approximately 3.5% of the analysis area).The overflow parking areas would reduce the potential for compaction in undesignated areas and decrease runoff and erosion on the side of roads within the campground by reducing the number vehicles that park in undesignated areas. There is the potential for the parking area to generate runoff during construction because vegetation would be removed and the soils would be graded and compacted. Design features such as erosion and sediment control structures, would be used during construction to mitigate soil loss due to runoff. Erosion and sediment control structures would remain in place until gravel is laid down on the parking area and the area around the constructed parking area have been revegetated. Heavy equipment would also cause compaction in the area being graded to construct the parking area and efforts would be made to avoid operating heavy equipment during wet conditions.

Alternatives A and B include widening the roads in the campground to approximately 20 feet total width. Widening the roads would create approximately 0.58 acres of additional disturbance (2.9% of the analysis area) where infiltration is reduced and runoff is increased. Alternatives A and B include removing the current walkway down the steep slope, grading the steep slope adjacent to the water play area, and stabilizing the graded slope with a combination of natural stone retaining walls and native trees and riparian vegetation (i.e., cottonwoods). The total disturbance is approximately 0.10 acres (approximately 0.5% of the project area). There is the potential for the section of slope being graded to erode during construction therefore, design features, such as erosion and sediment control structures, would be used during construction and until the site has been revegetated and/or stabilized with retaining walls. Heavy equipment could cause compaction in the area being graded and efforts would be made to avoid operating heavy equipment during wet conditions. Relocating the current access trail away from the steep slope going down to the creek would reduce erosion due to compaction of the trail. Infiltration capacity is expected to increase as vegetation is re-established on the slope.

Resource D: Recreation

Effects of Common to both Alternatives

Implementation of facility upgrades and improvement of physical accessibility features for both camping and day-use within the site offers health and safety upgrades that are a direct benefit to the visiting public. Reconstruction of the retaining walls by the water play area helps insure safer, long-term access to the creek. The addition of new shade structures to several camp sites and replacement of shade at existing day use structures would be a direct benefit. Reconfiguring parking would benefit all users by reducing the frustration associated with current parking congestion along campground access roads and within the sites. Historic fee data indicates larger groups reserve adjoining campsites. There would be no impact on current use from reconfiguring camp sites or associated parking.

Both alternatives propose the addition of a new parking area near the site entrance in an old road cut that would offer up to 20 new spaces. A self-pay fee station would be installed in the new parking lot to allow people to obtain a fee envelope close to their cars. This new parking capacity near the site entrance in both alternatives along the access road is expected to absorb current use and reduce congestion along the entrance to the site. It would limit vegetation and erosion impacts by reducing illegal parking along the access road into the site. There would be increased safety for pedestrians walking through the site to access the trailhead and staff who continually monitor to discourage drivers of large vehicles from blocking access. Vehicle congestion would be reduced. However, it is anticipated that staff would continue to provide traffic control during peak use periods.

Implementation of either alternative is not anticipated to completely prevent continued parking of vehicles illegally on Highway 12. It is unknown how many visitors that are unable to find parking, return at different times of day when parking is available. Turnover within the parking area happens several times per day. Traffic enforcement and regulatory signage along the access road continues to be the key to limiting parking outside of designated sites. Visitors would be encouraged to self-select to visit early in the day or late to avoid the majority of crowded conditions. There is not anticipated to be a substantially greater number of people hiking on the Lower Falls Trail through addition of better defined parking spaces available on-site.

New interpretive signage and a new amphitheater for guided programs would increase opportunities for visitors to learn about the resources of the area. Implementation of the proposed design features requiring use of natural materials during construction would insure that the additional parking area would improve the current congested environment that greets visitors now. It would not unduly impact the surrounding ambience of the natural environment nor impact the inviting nature of the lush riparian setting throughout the site, preserving and in some case enhancing the existing visitor experience.

The proposed changes to the trailhead infrastructure at the beginning of the trail are included in both alternatives. Reconstructing the short stretch of steps leading to the trailhead sign and re-positioning the register and sign would allow groups to read the sign at

one time and make it more attractive for hikers to access the sign and understand and comply with resource protection regulations.

Short term effects for both alternatives would include temporary displacement of the public during construction. The construction window for this project would primarily be during the months of February, September, October, November, December, and January which would cause the campground and the day use hiking trail to Lower Calf Creek Falls to temporarily close to the public during the fall visitation season. Based on past use data, it is anticipated that approximately 9,000 visitors would be impacted in September and approximately 8,500 visitors in October. Depending upon project phasing, access to the trailhead and campground may not be possible due to work needed on parking, campsites and bridge. It is anticipated that increased staffing would be required to insure the public does not park on the highway or walk into the construction site when conditions are not safe. Depending upon which of these months is targeted for construction, an average of approximately $5,000 in fees would not be collected. Closures would be a negative short term impact to recreational users who are unable to visit Lower Calf Creek Falls.

Effects Specific to Alternative A
In Alternative A the group day-use picnic area would remain in its current location with no change to current use. Day-use would continue to be divided between the upper area by the parking lot and the lower section which would continue to have two small group picnic shelters and the new amphitheater for educational programs. There would be no additional group picnic shelter in the lower day-use site and no change in visitor access to either location. The current flush toilet would remain in its current location. Group use would be divided between two locations with no concentration of day-use in one site. These facility changes are not anticipated to impact recreational users accessing the site for camping or day use.

Parking capacity in Alternative A would be provided by the existing parking area and the addition of the new overflow parking and defined parking along the access road. Parking capacity would total approximately 60 vehicles. This alternative would offer slightly less parking capacity in the existing parking area than Alternative B. Re-configuration of the current parking lot to provide vehicle turn-around and alleviate congestion would not be possible resulting in slightly greater demand for staff to direct traffic on high use days.

There is not anticipated to be any significant increase in the numbers of day use hikers on the Lower Calf Creek Falls trail.

Resource E: Soils
Effects common to both alternatives
Alternatives A and B include constructing an overflow parking area for 20 vehicles near the Highway 12 entrance to Calf Creek Campground and an additional 10 parking spaces between the creek and entrance sign. The total disturbance is approximately 0.70 acres (approximately 3.5% of the analysis area). The overflow parking areas would reduce the

potential for compaction in undesignated areas and decrease runoff and erosion on the side of roads within the campground by reducing the number vehicles that park in undesignated areas. There is the potential for the additional parking areas to generate runoff during construction because vegetation would be removed and the soils would be graded and compacted. Design features such as erosion and sediment control structures would be used during construction to mitigate soil loss. Erosion and sediment control structures would remain in place until gravel is laid down on the parking area and the area around the constructed parking area have been revegetated. Heavy equipment would cause compaction in the area being graded to construct the parking area and efforts would be made to avoid operating heavy equipment during wet conditions. Infiltration capacity is expected to increase on the hillslopes surrounding the new parking areas as vegetation is re-established. Riparian and native plants would be planted along the creek which would stabilize soils and protect the stream banks from erosion.

Alternatives A and B include widening the roads in the campground to approximately 20 feet total width. Widening the roads would create approximately 0.58 acres of additional disturbance (2.9% of the analysis area) where infiltration is reduced and runoff is increased (direct impact).

Resource F: Water Resources

Effects common to both alternatives

Alternatives A and B include replacing the low-water crossing with an open-bottom concrete culvert, removing the retaining wall and re-grading the steep slope down to the water play area, removing the existing access trail from the steep slope, constructing two additional parking areas near the Calf Creek Campground entrance, and widening the campground road to a total width of 20 feet. The disturbance associated with the above activities is approximately 1.4 acres (7% of the analysis area).

Changing the stream crossing to a culvert crossing would potentially reduce the amount of vehicle related contaminants, such as oil, grease, mud from tires, and brake dust, that are deposited directly into the stream due to vehicles entering the water. Erosion of the road on either side of the stream would also potentially be reduced since vehicles would not be entering and exiting the stream. Removing the existing concrete low-water crossing and installing the new open-bottom concrete culvert would increase turbidity and suspended sediment for a short period of time during removal construction and installation of culverts.

There is the potential for the section of slope being graded near the water play area to erode during construction which could reduce water quality in Calf Creek during storms. Design features such as erosion and sediment control structures, would be used during construction and until the site has been revegetated and/or stabilized with retaining walls to mitigate impacts to water quality. Heavy equipment could also cause compaction in the area being graded and efforts would be made to avoid operating heavy equipment during wet conditions to mitigate impacts to water quality. Relocating the current access trail away from the steep slope going down to the creek would reduce erosion due to

compaction of the trail and improve water quality from water flowing into the creek from the compacted trail.

Adding the overflow parking area would reduce the potential for compaction and therefore runoff and erosion on the side of roads within the campground and improve water quality. There is the potential for the parking area to generate runoff during construction, which could impact water quality in the stream. Design features such as erosion and sediment control structures, would be used during construction to mitigate impacts to water quality. Erosion and sediment control structures would remain in place until gravel is laid down on the parking area and the area around the constructed parking area have been revegetated to mitigate impacts to water quality after construction. Heavy equipment could also cause compaction in the area being graded to construct the parking area and efforts would be made to avoid operating heavy equipment during wet conditions to mitigate impacts to water quality.

Adding riparian vegetation along the creek would help to stabilize the soils and protect from scouring and erosion. An increase in canopy density over time as these plants grow would shade the stream and potentially help to decrease water temperatures to meet water quality standards.

Widening and paving the existing road would increase runoff from the road. However, the overall increase in road area is small for this project and substantial decreases in water quality from runoff are not expected.

Resource G: Wetlands/Riparian Zones

Effects common to both alternatives

Within the campground an existing concrete pad would be removed and two new walk-in sites would be constructed. The removal of the concrete pad and campsite development that includes planting vegetation as described in the design features would be a beneficial indirect impact to the riparian vegetation. Relocating the tent pad away from the creek, removing asphalt and replanting those areas at site #11 would have beneficial indirect impact for vegetation. Installing a shade shelter at site #9 does not require removal of vegetation therefore, there would be no direct impacts to vegetation. The construction of the stone retaining walls could have short term direct impacts to vegetation, but in the long term, indirect impacts to vegetation would occur as vegetation would fill in after construction is finished. Constructing the universally-accessible, unpaved walkway would require removing vegetation for the width requirements; this would be a direct impact to vegetation. Constructing an amphitheater would have direct impacts to low growing vegetation such as grasses, forbs, and weedy species. All the trees in the area would remain so no direct impacts would occur. The planting of cottonwood and other riparian vegetation in the lower area would be a beneficial indirect impact for vegetation; this would be a design feature to negate for those areas requiring potential vegetation removal.

Replacing the stone stairs to reduce erosion at the trailhead would improve vegetation conditions by maintaining soil thereby allowing vegetation to establish. The installation of barriers between campsites to define areas and direct traffic would be a design feature to prevent social trails and protect areas that are being restored; this would be a beneficial indirect impact for vegetation.

The replacement of the fabricated block wall with natural stone, the replacement of the toilets and sidewalks, all existing shade structures, tent pads, fire rings, tables, and numbered campsite posts would not have any direct or indirect impacts to vegetation as these structures have and would continue to be used for their current purposes. Replacing the timber components on the pedestrian bridge along with the electrical conduit and reconfiguring the camp host site would not have any direct or indirect impacts on the existing riparian vegetation, as the site would continue to be used for those needs.

Resource H: Wild and Scenic Rivers

Effects Common to Both Alternatives

Effects to Wild and Free-flowing: As stated in Water Resources, Section G, the addition of new culverts for the low water stream crossing would not result in any short or long term obstruction or impact to the free flowing nature of Calf Creek Segment 3 through the Campground or downstream to the Escalante River confluence.

Effects to Water Quality: As stated in Water Resources, Section G, there could be short-term, temporary impacts to turbidity and erosion run-off during construction both in the campground and downstream. However, changing the stream crossing from a ford to a culvert crossing is expected to reduce the amount of vehicle related contaminants, such as oil, grease, mud from tires, and brake dust, that are deposited directly into the stream due to vehicles entering the water. Erosion of the road on either side of the stream would also potentially be reduced since vehicles would not be entering and exiting the stream. This would be beneficial to the entire Segment 3 of Calf Creek through the campground and downstream to the Escalante River confluence. Planting riparian vegetation along the creek would protect the banks from erosion, and over time, increasing canopy density could help to lower water temperatures to meet water quality standards.

Effects to Tentative Classification: BLM Manual 6400 - Wild and Scenic Rivers - Policy and Program Direction for Identification, Evaluation, Planning and Management (2012) specifically addresses a recreational classification by clarifying in Section 3.6.D.Recreation Development 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). Proposed facility upgrades associated with this project would benefit the existing campers, hikers, swimmers and anglers recreating along the Calf Creek segment. The campground and day-use facilities and trailhead infrastructure would continue to be visible from the creek corridor but design features proposed would help to screen facilities from the creek corridor. As per the visual resources determination, facility colors and materials are anticipated to blend with the

surrounding natural landscape and be subservient, minimizing the visual intrusion to those recreating along the creek. The on-going presence of recreational facilities within the WSR corridor is consistent with the existing recreational classification.

Effects to Outstanding Remarkable Values (ORVs): The identified ORV's for Calf Creek include high scenic quality, rock art, pre-historic structures, high recreation use, bird habitat and riparian values. Revegetation of the lower section of the day-use site is anticipated to have beneficial effects to riparian and bird habitat.

There are no project effects that would pose a threat to suitability of Calf Creek for future WSR designation. As discussed several features of the project would be beneficial to WSR values by providing better protection of water quality, as a key element in managing long-term suitability.

Resource I: Visual Resources

Effects Common to Both Alternatives

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 alternatives for this proposed project, a linear KOP along Highway 12 travelling in both directions was used to complete the contrast rating worksheet and analyze this proposal.

Along most of the narrow, winding linear KOP (Highway 12) the project elements of Alternative A would be screened from view by landform and vegetation because the highway is located above the development on a ledge cut out of the sandstone and those travelling along the highway cannot see into the bottom of the canyon and are more focused on the stunning scenery and staying safely on the roadway. For those that are looking into the canyon, the length of time the visible project elements (parking areas, restroom, and parked vehicles) are in view is less than 20 seconds for eastbound travelers and less than 60 seconds for westbound travelers.

Left: Eastbound view along HWY 12 toward Calf Creek Recreation Area. Right: Westbound view along HWY 12 toward Calf Creek Recreation Area.

The proposed improvements associated with this alternative would be located in a recreation area that was developed in the 1960s. The renovated and/or additional built features associated with Alternative A would create similar levels of contrast to what is currently there. The recreation area is located in the floor of a narrow riparian canyon with thick vegetation and most built elements are screened from view by vegetation and landforms. 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 built elements proposed 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 J: Vegetation not including USFWS listed species

Effects common to both alternatives

Both alternatives propose the addition of a new parking area near the site entrance in an old road cut and an additional parking area between the creek and the site sign that would increase existing overall parking. The new parking area at the entrance of the site would require vegetation removal from the old road cut, this would have a direct impact on the vegetation. The parking site between the entrance and the bridge has lost all of the vegetation due to the area currently being used as overflow parking. The access road would be expanded to 20 feet wide, removal of vegetation along the edge of the current road has already occurred in some areas due to overflow parking by recreationist. In both alternatives the proposed action would help decrease off road parking that is currently impacting vegetation having a long-term indirect affect for vegetation. Design features include maintaining as much vegetation as possible so as to not impact upland vegetation resources in the long-term.

ALTERNATIVE B (EXPANDED IMPROVEMENTS)

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

Resource A: Cultural Resources

The impacts and management plan conformance associated with this alternative are the same as those described for Alternative A.

Resource B: Floodplains

The impacts and management plan conformance associated with this alternative are the same as those described for Alternative A.

Resource C: Hydrologic Conditions
The impacts and management plan conformance associated with this alternative are the same as those described for Alternative A.

Resource D: Recreation
Same as Alternative A except for the following:

Alternative B would move the current group picnic area in order to expand the day use parking area and move all day use to the lower, open area. The flush toilet building would be moved to the middle of the parking turn-around. Moving the current location of the group picnic use would be a change for local and repeat users of the site but would result in a clear separation of use provided by the group day-use picnic area co-located in conjunction with the new amphitheater. The addition of three new shade structures, the large group shelter, and additional trees and reconfiguring the lower area would make this area more functional and inviting for group use and offers connection to the water play area. Re-vegetation of the lower area with native trees and shrubs would greatly improve the riparian setting in this location. Dispersed camping would not be allowed. Non-designated dispersed camping in a developed campground without a minimum level of campsite amenities is not allowed under the regulations for campgrounds as expanded amenity fee sites (REA). This use is not allowable within Calf Creek Campground without individual designated campsite amenities. Dispersed camping opportunities continues to be offered throughout the Monument, as well as on neighboring public lands.

Increased parking in Alternative B would total up to 80 vehicles provided by additions within the existing parking area and the addition of the new overflow parking and defined parking along the access road. This alternative would offer more parking capacity in the current lot and would re-configure the current parking lot to provide safe vehicle turn-around and alleviate congestion. Future visitor demand for parking may be unable to be completely accommodated in any alternative due to the constrained nature of the site. Staff would continue to provide parking during peak periods.

Resource E: Soils
The impacts and management plan conformance associated with this alternative are the same as those described for Alternative A.

Resource F: Water Resources
The impacts and management plan conformance associated with this alternative are the same as those described for Alternative A.

Resource G: Wetlands/Riparian Zones
The potential removal of one or two trees on the edge of the riparian zone close to the current parking area would be a direct impact to the riparian vegetation to allow for an increase in size of the main parking area. The flush toilet building would be placed within of

the parking area and wouldn't have a direct or indirect impact on riparian vegetation. Relocation of the current group picnic area to the lower area would have beneficial indirect impacts to vegetation as the design features prescribes for trees and shrubs to be installed that area. The installation of three small single party shade shelters plus one large shelter would be located in the already disturbed area with little to no vegetation and in two locations were the invasive species puncture vine exists. Installing these shelters, planting native species, and maintaining the site to be weed free would have beneficial indirect impact to riparian vegetation.

The remaining project analysis would be the same as in Alternative A.

Resource H: Wild and Scenic Rivers
The impacts and management plan conformance associated with this alternative are the same as those described for Alternative A.

Resource I: Visual Resources
The impacts and management plan conformance associated with this alternative are the same as those described for Alternative A.

Resource J: Vegetation not including USFWS listed species
The impacts and management plan conformance associated with this alternative are the same as those described for Alternative A.

NO ACTION

Resource A: Cultural Resources
Under the No Action Alternative Calf Creek Campground would not lose the historic structures proposed for removal under the Action alternatives, and use of these structures would continue. However, the day use area structures are in poor condition and would continue to degrade over time, and they would eventually lose structural integrity, a vital part of their eligibility to the NRHP. The existing, but non-functional, toilet facility would continue to degrade, with similar consequences to the day use area previously mentioned. The concrete volleyball court is non-functional at present due to natural deterioration, and such deterioration would only increase with time. The shade shelters are of steel construction, and would probably remain intact for the foreseeable future. The portion of the old Escalante-Boulder road would continue to degrade and not see the upkeep that would come with use as an overflow parking area.

Resource B: Floodplains
Under the No Action Alternative, there would be potential negative impacts to the floodplain adjacent to the water play area. Stone blocks that were placed to reinforce the stream bank are failing and falling into the stream. This creates a hazard for swimmers, waders, and pedestrians walking along the stream bank and exposes the soils along the

stream bank. Continued failure of the reinforcement structure would lead to excessive erosion of the stream bank that the stone blocks were installed to protect, especially during high flow events.

Resource C: Hydrologic Conditions
Under the No Action Alternative, there would be the potential for negative impacts to hydrologic conditions due to soil compaction along edges of the driveway where patrons park when the existing parking lot is full. Compaction would occur from repeated instances of vehicles driving and parking on the unimproved edges of the existing road. The compacted soils would have lower water infiltration capacity and lead to excessive puddling, runoff, and erosion during storms. There would be no impacts to hydrologic conditions due to widening the road, grading near the water play area or in the area designated for overflow parking under the No Action Alternative since no construction would be authorized in those areas.

Resource D: Recreation
In the No Action Alternative the general public would not see any changes at the recreation site. No deferred maintenance projects would be implemented thereby all current facilities would remain the same. The constrained geography of the site and the regional demand for developed camp sites would continue to result in camping in the day use area or in other areas not designated for camping, as well as doubling up in sites that are only physically able to accommodate groups of six people. One of the camp sites is on sloping and eroding terrain; one is exposed with no shade; two camp sites lack designated parking; and two are located close to the edge of the creek where flash flooding occurs. Conflicts, crowding, and damage or erosion to vegetation and soils would continue. The water play area would continue to erode with no improved access.

Due to growing regional visitation, the public would continue to encounter a lack of places to park on an increasing number of days. Vehicle congestion throughout the day-use parking area, along Highway 12 and within the campground would not be alleviated. Safety hazards to staff and pedestrians would be present due to blocking of the access road by large vehicles. There would be no increase in recreational opportunities from the addition of interpretive elements such as signage or the amphitheater. Campers at several campsites would continue to experience a lack of shade structures. The open area below the campground would continue to appear wind-blown and eroded from social trails. Optimal ADA access would not be accommodated. The hillside supporting trailhead infrastructure would continue to erode.

Resource E: Soils
Under the No Action Alternative, there would be the potential for negative impacts to soils due to compaction along edges of the driveway where vehicles park when the existing parking lot is full. Compaction would occur from repeated instances of vehicles driving and parking on the unimproved edges of the existing road. The compacted soils would have lower water infiltration capacity and lead to excessive puddling, runoff, and erosion during

storms. There would be no impacts to soils from widening the road, construction in the water play area and the area designated for overflow parking under the No Action Alternative since no construction would be authorized in those areas.

Resource F: Water Resources
Under the No Action Alternative, there would be the potential for negative impacts to water quality due to vehicles crossing Calf Creek at the low-water crossing. Vehicles must drive through the water at the low-water crossing and have the potential to add pollutants to the stream from sediment washed from vehicles, sediment transported from the edges of the low-water crossing, leaking oil and/or road grime that washes off vehicles, and brake dust that is washed from vehicle wheels when driving through the water.

There would be no impacts to water quality from widening the road, grading of the stream bank or grading of the overflow parking areas under the No Action Alternative since no construction activities would be authorized. However, continued failure of the stone blocks stabilizing the stream near the water play area could lead to excessive erosion of the stream bank and contribute sediment to Calf Creek. Erosion from compacted soils from vehicle parking in unauthorized areas along the edges of the road could also degrade water quality from sediments transported to Calf Creek during storms. No additional riparian vegetation would be planted along the creek to stabilize soils and shade the creek.

Resource G: Wetlands/Riparian Zones
Under the No Action Alternative, removal of vegetation would not occur therefore, no direct impacts would take place. The large cement pad within the campground would not be replaced with the walk in campsites and would not be revegetated. Installation of plants in the lower picnic area and identified campsites would not occur. Riparian vegetation would not establish along the banks of the play area due to erosion. The existing riparian vegetation would remain as is and the No-Action Alternative would not contribute to direct or indirect impacts to riparian resources.

Resource H: Wild and Scenic Rivers
In the No-Action alternative any existing riparian resource impacts (i.e. vegetation impacts from vehicle ingress, soil compaction on streamside access trails, and streamside erosion) would continue. Water quality would continue to be affected from streamside trail erosion and contaminants from oil and debris washing off vehicles upon crossing the creek. The current picnic area would remain in the same location and there would be no change to the current riparian vegetation or outstanding remarkable values.

The No-Action alternative and continuation of current conditions are not expected to pose any threat to recreational classification, wild and free-flowing nature, water quality, or outstanding remarkable values of this segment nor pose a threat to long-term suitability for designation.

Resource I: Visual Resources

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

Resource J: Vegetation not including USFWS listed species
Under the No Action Alternative, vegetation would not be removed to construct the parking areas in the upland sections. Visitors would continue to park off the road which would continue to impact vegetation. The No-Action Alternative could further affect vegetation resources primarily due to off-road parking.

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. Ongoing uses and activities in the area include travel along and maintenance of Highway 12, recreational visits, maintenance and improvement of utility corridors, livestock grazing, and removal of invasive/noxious plants species in the Escalante River and its tributaries.

Resource A: Cultural Resources
Cumulative Impact Area (CIA)
The Cultural Resources CIA for this project is the campground itself, recorded as 42Ka8060, the short portion of adjacent 24Ka6091, the old Escalante-Boulder road, to be used as an overflow parking area, and the area of Calf Creek Canyon containing the trail to Lower Calf Creek Falls. This is the area that is serviced by the campground and the Calf Creek trail, where use has been and would continue to be concentrated.

Cumulative Impact Analysis
The timeframe for this analysis is from 1963, when Calf Creek Campground was first established, to twenty years following implementation of this project (a reasonable period into the future before significant repairs or modifications would be necessary at the campground). Past actions include the development of the campground and establishment of the Calf Creek trail. Campground development occurred prior to the National Historic Preservation Act, but recent cultural resource surveys do not indicate that any archaeological or historic properties were directly affected by the construction. The canyon trail has always been popular, and was in use prior to 1963.

Construction of the recreational facility allowed greater and more regulated access to the canyon, but use has always primarily been along the trail, and known Historic Properties are high on the canyon walls or off the trail. At present, there are no direct impacts to Historic Properties along the canyon trail, and any impacts at the campground itself are closely related to its designed use and natural deterioration (hence the need for this project proposal). Recreational actions over the next 20 years or so should closely mimic those that are already occurring. Any maintenance projects or future construction would be subject to NEPA and NHPA analysis, with any resulting and unavoidable impacts to Historic Properties

being mitigated as necessary. There would be no substantial difference between alternatives as far as cultural resources are concerned.

Reasonable and foreseeable impacts to Calf Creek Campground, site 42Ga8060, would be continued maintenance and potential upgrades of facilities over time. The loss of the historic features contributing to site eligibility under NRHP criterion C would be mitigated, so cumulative impacts to those features would not be an issue. In time, additional features at this site would become historic and contribute to eligibility, and future actions at Calf Creek Campground would need to be taken into consideration at that time.

Reasonable and foreseeable impacts to the old Escalante to Boulder road, site 42Ga6091, would consist of use and maintenance of the road portion used as an overflow parking area. This is considered a beneficial effect. This offers good interpretive potential regarding the history of Escalante and Boulder, the CCC, and transportation development between these two communities. Unfortunately, the balance of the road in the vicinity of Calf Creek Campground is not suitable for use as an interpretive trail. No adverse cumulative impacts are foreseen for this site.

Reasonable and foreseeable impacts to the canyon and trail between the campground and lower Calf Creek Falls would be much the same as present, ongoing impacts. Again, such use does not directly impact any known Historic Properties, and this would not likely change in the foreseeable future. It is important to realize that this campground proposal is not designed to bring more people to the location, but to better accommodate the numbers of visitors already utilizing the area.

Resource B: Floodplains

Cumulative Impact Area (CIA)

The CIA for floodplains is the 6000-acre Calf Creek watershed from the headwaters to the confluence with the Escalante River. This area has similar soils and hydrologic conditions.

Cumulative Impact Analysis

The cumulative impacts to floodplains from past actions include the construction of the low water crossing, water play area, road crossing, and bridge within the floodplain when the campground was constructed in the early 1960's. The concrete water crossing altered a small area with in the floodplain from natural substrate (gravel, cobble, and sand) to concrete, but did not alter the overall function of the floodplain. Stacked blocks were installed in the water play are to stabilize the stream banks, but have begun to fail due to the stream scouring around the blocks. In 2006, removal of Russian olive and tamarisk, an invasive species occurred within the entire riparian zone and floodplain of the Calf Creek Tributary and presently removal of regrowth of these two species occur every few years to keep the area cleared.

The proposed project (present impacts) would replace the concrete low water crossing with a concrete culvert to allow vehicles to cross over the stream without entering the stream

and would restore the stream bed at the crossing to a more natural substrate (direct impact). There would be temporary disturbance in the floodplain during removal of the existing concrete pad and during construction of the new culvert crossing, but the overall impact is not expected to be substantial. Installing the culvert crossing would contribute to reduced long-term impacts to the stream banks in the floodplain from vehicle traffic on the east and west side of the stream crossing (direct impact). Removing the retaining wall and grading the slope adjacent to the water play area would cause a temporary disturbance to the floodplain during construction. Removing the retaining wall and grading the slope would improve the stability of the floodplain over the long-term. Impacts are not expected to be substantial and should be negligible once the slope adjacent to the floodplain is vegetated and covered with gravel.

Reasonable and foreseeable impacts to Calf Creek Campground would be continued maintenance of campsites, roads, trail heads, and parking areas and potential upgrades of facilities over time. The placement of a fiber optic line from Highway 12 to the designated camp host location, this action is not likely to affect the floodplains as it would be proposed to be placed in the road.

Resource C: Hydrologic Conditions

Cumulative Impact Area (CIA)

The CIA for hydrologic conditions is the 6,000-acre Calf Creek watershed from the headwaters to the confluence with the Escalante River. This area has similar soils and hydrologic conditions.

Cumulative Impact Analysis

The cumulative impacts to hydrologic conditions from past actions include the construction of the Highway 12 adjacent to the Calf Creek watershed (approximately 24 acres) in the mid-1900's (between 1940 and 1950) and the construction of roads and the parking area within the campground when it was constructed in the early 1960's. Construction of roads decreased infiltration capacity because soils were compacted and roads were paved. However, the overall disturbance area is small with respect to the CIA (approximately 0.60%). Additionally, parking in undesignated areas along Highway 12 and along the roads within the campground compacts soils and decreased infiltration capacity and increased runoff. The Lower Calf Creek Falls hiking trail is also within the CIA. The trail and social trails leading to the trailhead are compacted from foot traffic and have lowered infiltration capacity than the native soils, which lead to increased runoff from the trail.

The proposed actions (present impacts) include constructing an overflow parking area for 20 vehicles near the Highway 12 entrance to Calf Creek Campground and an additional 10 parking spaces between the creek and entrance sign. The total disturbance is approximately 0.70 acres (0.01% of the CIA). The overflow parking areas would reduce the potential for compaction in undesignated areas and decrease runoff and erosion on the side of roads within the campground by reducing the number vehicles that park in undesignated

areas. There is the potential for the parking area to generate runoff during construction because vegetation would be removed and the soils would be graded and compacted. The proposed actions also include widening the roads in the campground to approximately 20 feet total width. Widening the roads would create approximately 0.58 acres of additional disturbance (0.01% of the CIA) where infiltration is reduced and runoff is increased (direct impact). The proposed actions include removing the current walkway down the steep slope, grading the steep slope adjacent to the water play area, and stabilizing the graded slope with a combination of natural stone retaining walls and native trees and riparian vegetation (i.e., cottonwoods). The total disturbance is approximately 0.10 acres (less than 0.01% of the CIA). There is the potential for the slope to erode during construction due to removal of vegetation and compaction of the soils. Relocating the current access trail away from the steep slope going down to the creek would reduce erosion due to compaction of the trail. Infiltration capacity is expected to increase as vegetation is re-established on the slope, and long-term impacts are not expect to be substantial.

Reasonable and foreseeable impacts to Calf Creek Campground would be continued maintenance of campsites, roads, trail heads, and parking areas and potential upgrades of facilities over time. The placement of a fiber optic line from Highway 12 to the designated camp host location, this action is not like substantially impact the hydrologic conditions as it would be proposed to be placed in the road.

Resource D: Recreation

Cumulative Impact Area

The cumulative impact area of analysis for recreation includes Highway 12 corridor from Red Canyon to Capitol Reef National Park.

Cumulative Impact Analysis (CIA)

Effects of both alternatives

The impacts to recreational opportunities and the visitor experience from past, present, and reasonably foreseeable actions include the potential effects of any new recreational facilities or potential for changes in visitor use patterns along Highway 12. Implementing the project actions in either alternative is not expected to create any new recreational uses or displace current users along Highway 12 in the CUA. Increased parking capacity and facility upgrades insure the site is best equipped to meet the growing demand for recreational use along Highway 12.

There are no known potential cumulative effects of the project within the CIA.

Resource E: Soils

Cumulative Impact Area (CIA)

The CIA for soils is the 6,000 acre Calf Creek watershed from the headwaters to the confluence with the Escalante River. This area has similar soils and hydrologic conditions.

Cumulative Impact Analysis
The cumulative impacts to soils from past, present, and reasonably foreseeable actions are the same as those described for Resource C: Hydrologic Conditions.

Resource F: Water Resources
Cumulative Impact Area (CIA)
The CIA for soils is the 6,000 acre Calf Creek watershed from the headwaters to the confluence with the Escalante River. This area represents the entirety of surface and groundwater flowing from the Calf Creek drainage to the Escalante River.

Cumulative Impact Analysis
The cumulative impacts to water resources from past actions include four point-to-point water diversions for stock watering and one spring-fed water diversion for Calf Creek Campground. The stock watering rights were claimed in 1888 and the spring-fed water right was claimed in 1963. Eight miles of Calf Creek were listed on the EPAs 305(b) and 303(d) lists in 2008 for failing to meet water quality standards for temperature for cold water species of game fish (Class 3A). Past action within the CIA also include Livestock grazing, which was unregulated from the 1870's to 1934 until the passage of the Taylor Grazing act. In 1964, livestock use was removed from the Calf Creek drainage due to conflicts between livestock and recreationist.

The proposed actions (present impacts) include constructing an overflow parking area for 20 vehicles near the Highway 12 entrance to Calf Creek Campground and an additional 10 parking spaces between the creek and entrance sign. The total disturbance is approximately 0.70 acres (0.01% of the CIA). The overflow parking areas would reduce the potential for compaction in undesignated areas and decrease runoff and erosion, and therefore decrease sediment transport to Calf Creek, on the side of roads within the campground by reducing the number vehicles that park in undesignated areas. There is the potential for the parking area to generate runoff and transport sediment during construction because vegetation would be removed and the soils would be graded and compacted. Parking areas accumulate contaminants (e.g., road grime, mud, and break dust) and there is the potential for runoff from parking areas to transport these pollutants to Calf Creek.

The proposed actions also include widening the roads in the campground to approximately 20 feet total width. Widening the roads would create approximately 0.58 acres of additional disturbance (0.01% of the CIA) where infiltration is reduced and runoff is increased (direct impact). Roads accumulate contaminants (e.g., road grime, mud, and break dust) and there is the potential for runoff from roads to transport these pollutants to Calf Creek.

The proposed actions include removing the current walkway down the steep slope, grading the steep slope adjacent to the water play area, and stabilizing the graded slope with a combination of natural stone retaining walls and native trees and riparian vegetation (i.e.,

cottonwoods). The total disturbance is approximately 0.10 acres (less than 0.01% of the CIA). There is the potential for the slope to erode during construction due to removal of vegetation and compaction of the soils. Relocating the current access trail away from the steep slope going down to the creek would reduce erosion due to compaction of the trail. Infiltration capacity is expected to increase as vegetation is established on the slope, and long-term impacts to water quality are not expect to be substantial. As riparian vegetation canopy increases, there is the potential for shading of the steam to benefit water quality by decreasing water temperatures to meet water quality standards.

Grazing still occurs within the area and would most likely continue to occur on New Home Bench. Impacts from grazing may include compaction of soils that increase runoff and erosion, and deposition of manure that may runoff into Calf Creek during storm flows.

Overall, actions under the proposed project are expected to have short-term negative impacts to water resources (i.e., an increase in runoff and turbidity) during construction. The action alternatives would make improvements to the low water crossing, water play area, parking capacity, and roads, and are expected to have long-term beneficial impacts to water resources.

Reasonable and foreseeable impacts to Calf Creek Campground would be continued maintenance of campsites, roads, trail heads, and parking areas and potential upgrades of facilities over time. The placement of a fiber optic line from Highway 12 to the designated camp host location, this action is not likely to affect water quality, as it would most likely be proposed to be placed in the road.

Resource G: Wetlands/Riparian Zones

Cumulative Impact Area (CIA)

The cumulative impact area of analysis is the Calf Creek watershed riparian zone. This begins at the springs in the upper reaches of the tributary to the confluence with the Escalante River. This area was chosen due to the recreation usage of the area within this watershed.

Cumulative Impact Analysis

The temporal scope of this analysis is from the 1870's to approximately the year 2037. This is the reasonable timeframe when activities could be analyzed.

The cumulative impacts to riparian and wetlands from past actions within the CIA include Livestock grazing, which was unregulated from the 1870's to 1934 until the passage of the Taylor Grazing act. In 1964, livestock use was removed from the Calf Creek drainage due to conflicts between livestock and recreationist. During the 1960's the Calf Creek recreation area was developed with updates to the site continuing to the present. In 2006, removal of Russian olive and tamarisk, an invasive species occurred within the entire riparian zone of the Calf Creek Tributary and presently removal of regrowth of these two species occur every few years to keep the area cleared. In 2009, the culinary waterline at Calf Creek was

replaced which required removal of both upland and riparian vegetation and replacement of vegetation when the project was complete.

Reasonably foreseeable actions include the placement of a fiber optic line from Highway 12 to the designated camp host location, this action is likely to not directly or indirectly impact the riparian zone as it would most likely be proposed to be place in the road.

The proposed action alternatives would make improvements to the riparian zone with the design features of restoring parts of the campground with native vegetation. Areas along Calf Creek such as the play area and the trailhead location would most likely see a decrease in soil erosion where plants would be installed for restoration or vegetation would naturally fill in. With a defined path system in the campground there would be less social trailing which would improve the chance of success for vegetation establishment through both passive restoration and active restoration. The proposed facility upgrades would contribute to short term direct impacts but long term indirect impacts would improve riparian vegetation at the campground and within the entire tributary along Calf Creek.

Resource H: Wild and Scenic Rivers

Cumulative Impact Area (CIA)

The CIA for Wild and Scenic Rivers includes Segment 2 that begins at Lower Calf Creek Falls and extends down to the campground and the entire stretch of Segment-3 of Calf Creek that begins at the upper edge of the campground and flows to the confluence of the Escalante River The CUA would include the WSR eligibility width of 1/4 mile from the mean high-water mark on both sides of Calf Creek.

Cumulative Impacts Analysis

The cumulative impacts from past, present or reasonably foreseeable actions on WSR segments are required to address the following elements:

Wild and free-flowing nature: As stated above in Water Resources Section G, the addition of new culverts for the low water stream crossing would not result in any short or long term obstruction or impact to the free flowing nature of Calf Creek Segment 2 or Segment 3 from the waterfalls through the Campground or downstream to the Escalante River confluence.

Water quality: As stated above in Water Resources, there could be short-term impacts to turbidity and run-off during construction both in the campground and downstream. However, changing the stream crossing from a ford to a culvert crossing is expected to reduce the amount of vehicle related contaminants, such as oil, grease, mud from tires, and brake dust, that are deposited directly into the stream due to vehicles entering the water. Erosion of the road on either side of the stream would also potentially be reduced since vehicles would not be entering and exiting the stream. This would be beneficial to the entire Segment 3 of Calf Creek downstream to the Escalante River confluence and would have no impact on Segment 2 above the campground.

Tentative classification: Facility upgrades associated with this project and any future proposed actions at this site or along Highway 12 are not anticipated to pose any impact to recreational classification for the entire segment 3 or have any impact on the scenic classification of Segment 2 above the campground.

Outstanding Remarkable Values (ORVs) identified as high scenic quality, rock art, pre-historic structures, high recreation use, bird habitat and riparian values: There are no known anticipated threats to the ORVs.

There are no known cumulative effects that would pose a threat to suitability of all Calf Creek segments for future WSR designation.

Resource I: Visual Resources

Cumulative Impact Area (CIA)

Visual Resources - The cumulative impact area of analysis for Visual Resources is the viewshed along Highway 12 from Escalante to Boulder (approximately 40 miles) through the Escalante Canyons.

Cumulative Impact Analysis

The cumulative impacts to visual resources from past, present, and reasonably foreseeable actions include establishment of residential and commercial development, recreational facilities (trailheads, day use areas, etc.), general recreational use, livestock grazing management facilities (corrals, fences, water developments, storage buildings, etc.), utility corridor construction, improvement and maintenance (power lines, communication lines, etc.) and road construction and maintenance activities. Some of these uses and actions began in the cumulative impact area beginning in the mid-1800s and are projected to continue into the future, with residential and commercial development and recreational use likely to increase based on current trends. The effect of these uses and actions has altered the characteristic landscape to a degree, but most casual observers would consider this viewshed along Highway 12 to be mostly undeveloped and natural appearing. Recent actions within the viewshed have been implemented to protect the visual character, and because of the visual management objectives of BLM in this area, it can be assumed that the visual character would stay intact for years to come.

The action alternatives would make improvements to an existing development using elements that would blend with the landscape and be largely screened from view. Additionally, the viewshed along Highway 12 from Escalante to Boulder 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 J: Vegetation not including USFWS listed species

Cumulative Impact Area (CIA)

The cumulative impact area of analysis is the upland zone through the entire Calf Creek watershed. This begins in the upper reaches of the watershed to the confluence with the Escalante River. This area was chosen due to the recreation usage of the area within this watershed.

Cumulative Impact Analysis
The temporal scope of this analysis is from the 1870's to approximately the year 2037. This is the reasonable timeframe when activities could be analyzed.

Past action within the CIA include Livestock grazing, which was unregulated from the 1870's to 1934 until the passage of the Taylor Grazing act. In 1964, livestock use was removed from the Calf Creek drainage due to conflicts between livestock and recreationist. Grazing still occurs and would most likely continue to occur within the Monument. During the 1960's the Calf Creek recreation area was developed with updates to the site continuing to the present. In the 1950's Highway 12 was paved and continues to be maintained.

The proposed actions include constructing an overflow parking area for 20 vehicles near the Highway 12 entrance to Calf Creek Campground and an additional 10 parking spaces between the creek and entrance sign. The overflow parking areas would reduce vegetation in the site closest to the entrance but would prevent further damage to vegetation from vehicles parking in undesignated areas. The site between the entrance sign and the bridge is currently void of vegetation due to current undesignated parking.

Reasonable and foreseeable impacts to vegetation within Calf Creek Campground would be continued maintenance of campsites, roads, trailhead, and parking areas and potential upgrades of facilities over time. The placement of a fiber optic line from Highway 12 to the designated camp host location, this action is not likely to affect vegetation, as it would mostly likely be proposed to be placed in the road.

The cumulative impacts to vegetation resources from past, present, and reasonably foreseeable actions include recreational use throughout the Calf Creek tributary, livestock grazing on New Home Bench, and the Highway 12 and utility corridor construction and maintenance needs. The action alternatives would make improvements to an existing development and would have short-term impacts on upland vegetation with the construction of parking areas and widening of the access road. Long-term impacts would have positive implications for vegetation as vehicles would not be allowed to park off the road and would be required to park in the designated parking lots therefore reducing impacts on the surrounding vegetation. The proposed facility upgrades therefore, would not contribute to an increase in impacts to vegetation resources of Calf Creek.

CHAPTER 5
PERSONS, GROUPS, AND AGENCIES CONSULTED

During preparation of the EA, the public was not notified of the proposed action by posting on the BLM NEPA Register. A 30-day public comment period was offered to the public for review the EA.

COMMENT ANALYSIS AND RESPONSE TO PUBLIC COMMENTS

During the 30-day comment period, BLM received 12 emails or letters from 12 individuals. All substantive comments (as defined in H-1790-1 NEPA Handbook, page 66) were considered to the extent feasible and are addressed below by topic.

Project Timing

Seven commenters wrote about the potential negative impacts of the closing the recreation area during the high visitation months, especially September and October. One commenter wrote about the potential negative impacts of construction during the first two weeks of September when the hummingbird study is occurring.

Comment Response: Mexican Spotted Owls (MSO) have been observed in the Calf Creek Tributary on several occasions. Nesting has never been confirmed and are thought to be migrants. There is no Protected Activity Center for MSO established in this area. Due to the cliff nature of Calf Creek it has been determined that there is potential for nesting habitat in this area. To avoid impacts to nesting MSO due to project activity and noise, certain proposed improvements, would occur only between September 1 and February 28. (see Appendix A in FONSI).

Purpose and Need and Existing Conditions

One commenter wrote that the Purpose and Need and Existing Conditions included in the EA were erroneous, inaccurate, and misleading.

Comment Response: BLM has modified the purpose and need statement and existing conditions descriptions for clarification.

BLM Project Team

One commenter questioned the knowledge and experience of the planning and design team who collaborated to develop this project as well as outreach to other staff.

Comment Response: BLM conducted internal scoping of the entire staff of GSENM including the interdisciplinary team prior to the site design, during design development, and at solicitation for public comment (See Appendix A - Interdisciplinary Team Checklist). The initial design received input from both recreation planners, visitor services staff, the landscape architect, the civil engineer, the soil and hydrology specialist, the botanist, the wildlife biologist, and the archeologist. That input directly influenced the action alternatives.

Prioritization of Funding

One commenter wrote that this funding should instead be used to install toilets at other sites on the Monument with human waste issues.
Comment Response: Deferred maintenance funds are tied to the particular projects for which it was requested and approved. It cannot be used in other locations. The recreation fee moneys have some flexibility but we try to use them as much as possible in the locations where they are collected.

Competition with Local Businesses
One commenter wrote about the potential negative impact to local businesses from increasing the number of campsites.
Comment Response: The initial recreational developments at Calf Creek were initiated under authorization and funding of an Accelerated Public Works Program in 1962 and completed in 1963 to include nine individual camp units, a toilet, and day use facilities. Calf Creek Recreation Area was established on public lands for its recreational and scenic value by BLM in 1970, under authority of 43 CFR 2410 and 2411 and the Classification and Multiple Use Act. BLM developed a Campground Business Plan in 2012 for Calf Creek Recreation Area that addressed fees and anticipated costs associated with operating the campground and day-use site. The Business Plan anticipated that the campground could operate up to 19 units. It also included a market analysis of fees being charged locally and regionally for camping. The analysis revealed that the fee structure is less or comparable to fees charged by other local providers. Privately owned, and nearby national and state park facilities typically provide a higher level of service (i.e. showers, utility hook-ups, Wi-Fi, etc.), thus the fees at those sites are higher. The proposed improvements would most likely not have a negative impact on local businesses due to demand for higher level of service needs for visitors.

User Conflicts
One commenter questioned the validity of user conflicts associated with overflow camping in the day use area and parking lot.
Comment Response: Calf Creek Recreation Area is one of the only developed recreation sites on GSENM. A basic tenet of recreation site design separates day use from camping where possible. Continuing to allow for unspecified numbers of people to disperse camp in an open riparian area and park atop any remaining open road edge contributes to on-going congestion of vehicles and people on-site. A modest level of site hardening and definition of use is required to simply protect the site from on-going erosion and trampling as well as accommodate the current level of visitation. The campground and day use area is a constrained site with limited space for visitors to camp, park, hike and recreate. Over the past decade, vehicles have become larger, demand has increased significantly and dispersed, undefined uses cannot be accommodated as in the past.

Party Size in Camp Units
One commenter wrote about the negative impact of the proposed site design on limiting camping party sizes and favoring walk-in sites over larger sites.

Comment Response: The proposal does not favor walk-in sites over larger sites. The only site proposed for "removal" is the one closest to the pedestrian bridge on the east side of the creek. This site has eroded away so extensively that there are no locations for tents to be pitched without going down and toward the creek away from the parking, picnic table, and fire ring. Reconstructing that site to allow for parking for three developed walk-in sites increases the capacity in the campground as opposed to reducing it. In addition, this area is commonly used for undesignated walk-in camping already. Historically, groups desiring multiple tent locations or the accommodation of larger parties have reserved multiple adjoining sites. This inherent site constraint is reflected in the 2,217 camping use permits issued in 2016, less than 4% were for parties of seven or more people.

In response to public comment, the one vehicle per campsite limit would not be included in the decision record. The removal of asphalt near two of the campsites would also not be included in the decision record. Also due to comment response, tent pads to be constructed would be flush with the ground surface and range in size from 12'x12' to 16'x16' depending on the space available in each site. Exceptions below this range could be necessary in the small sites like #7.

Large Group Camp Site

One commenter requested that a designated group camp site be included.

Comment Response: BLM agrees that there is a demand for group camping. Unfortunately, there is not adequate space at Calf Creek Recreation Area to accommodate group camping and associated vehicle parking. Group camping is likely to be addressed in future planning efforts for the HWY 12 and Escalante Canyons Special Recreation Areas.

Walk-in Sites

One commenter wrote about the potential safety concerns related to locating walk-in sites 15, 16 and 17 near Calf Creek.

Comment Response: The proposed location for walk-in sites 15, 16, and 17 is approximately 4 feet above the base flow level at Calf Creek. The current visible high water mark adjacent to the proposed location for these sites is approximately 1 to 1.5 feet above the base flow level. While flash flooding is certainly a possibility in the Calf Creek drainage, as with most other canyons in the Escalante River watershed, these are relatively infrequent. The placement of campsites at approximately 4 feet above the base flow water line is adequate to allow campers to retreat to higher ground in the event of a flash flood. The placement of flood warning signs near campsites that are adjacent to the creek clearly describes the risk involved with camping near the creek. Given the described risk, campers must use reasonable judgement and evaluate their risk tolerance in deciding where they camp.

Historic Structures

One commenter wrote about the potential negative impacts of removing the historic structures (wooden picnic tables, grill, vault toilet).

Comment Response: The removal of the historic vault toilet would not be included in the decision record. While the accessibility guidelines do not require removal of existing site fixtures that do not meet the guidance, implementing the selected alternative would require removal of the picnic tables and grill so that area can be reconfigured for parking and improved vehicle circulation reducing congestion. Picnic tables and shade shelters would be located in the lower area.

Fee Stations

One commenter understood the EA as specifying only one fee station near the entrance by HWY 12.

Comment Response: The design drawings note two self-pay fee stations: one near the existing location and a smaller one by the new overflow parking area up near the highway. The addition of a second small self-pay fee station offers convenience to those who park in the overflow parking area so they don't have to walk down to the main fee station and then walk back up the hill to put the fee receipt in their automobile window. The main fee station includes the new kiosk design as well as the fee envelope dispenser and receptacle.

Amphitheater

One commenter stated that constructing an amphitheater was not supported by the Purpose and Need for the project.

Comment Response: Providing space in the campground for a small rustic amphitheater would offer a multi-use space for use by educational groups of all ages as well as a defined space for ranger-led public programs would contribute to improving the recreational experience of visitors.

Retaining Walls

One commenter wrote about the potential negative impacts to scorpion habitat in the existing block walls from replacing them with natural stone walls.

Comment Response: The existing retaining walls in the recreation area were constructed over the past few decades as needed by steep slopes and areas that were eroding. The proposal calls for replacing these fabricated block retaining walls with ones constructed of natural stone. As scorpions became established in the fabricated block wall construction, it is assumed that they would utilize the cracks and crevices in a natural stone rock wall, which is actually a more natural substrate.

Trash Collection

One commenter wrote about issues associated with not providing trash collection at the recreation site.

Comment Response: Offering public trash receptacles on-site at Calf Creek Recreation Area has been avoided due to the potential for bear issues as well as the challenge with collection and high costs. The Monument has limited staffing support to clean restrooms and pick up trash, this includes a volunteer camp host. We do intend to explore installing bear proof trash dumpsters up near the highway as part of these improvements.

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

Name	Purpose & Authorities for Consultation or Coordination	Findings & Conclusions
Utah SHPO	Consultation of NHPA, Section 106.	Adverse effect with appropriate mitigation to be applies. SHPO consultation completed on July 22, 2016

LIST OF PREPARERS

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

Table 5.2. List of Preparers

Name	Title	Responsible for the Following Section(s) of this Document
Allysia Angus	Project Lead Landscape Architect	Site Designs, Technical Coordination, Impact Analysis for Visual Resources
David Barfuss	Engineer	Site Designs, Engineering
Northwind Resource Consulting	Engineering Contractors	Site Designs, Engineering
Matthew Zweifel	Archaeologist	Cultural Resources
Lora Gale	Outdoor Recreation Planner	Impact Analysis for Recreation and Wild and Scenic Rivers
Amber Hughes	Planning and Environmental Coordinator	NEPA Compliance Quality Control Impact Analysis for Vegetation
Ken Bradshaw	Soil Scientist	Impact Analysis for Floodplains, Hydrologic Conditions, Soils, and Water Resources

APPENDIX A

INTERDISCIPLINARY TEAM CHECKLIST

INTERDISCIPLINARY TEAM CHECKLIST

Project Title: Calf Creek Recreation Area Site Improvements
NEPA Log Number: DOI BLM UT 0300 2015 0040 EA
Project Leader: Allysia 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 (Bybee)	Particulate matter and gaseous pollutants generated during construction should be quickly dispersed and have no measurable effect on air quality.	/s/ J.Bybee	5/23/2016
NP	Areas of Critical Environmental Concern (Beal/Gale)	No Areas of Critical Environmental Concern are designated within Grand Staircase Escalante National Monument.	J. Beal	5/24/2016
NI	Biological Soil Crusts (Brinkerhoff)	The proposed action would not impact the overall health of the existing biological soil crusts.	/s/ R. Brinkerhoff	5/24/2016
NP	BLM Natural Areas (Beal)	No Natural Areas would be impacted for this project.	J. Beal	5/24/2016
PI	Cultural Resources (Zweifel)	SHPO consultation indicates that mitigation would be required for the structures in excess of 50 years old, but that this would consist of detailed documentation. Some additional consultation would be required for the old Escalante Boulder CCC road (proposed overflow parking area). No Native American sites were found in the course of the APE cultural resource inventory.	/s/ M. Zweifel	5/12/2016
NI	Greenhouse Gas Emissions (Bybee)	Construction would be completed with the use of mechanized equipment. The emissions generated would quickly disperse and have no measurable effect.	/s/ J.Bybee	5/23/2016
NI	Environmental Justice (Hughes)	The proposal would not have disproportionate effects on low income or minority communities.	/s/ A. Hughes	5/20/2016

Determination	Resource	Rationale for Determination*	Signature	Date
NP	Farmlands (Prime or Unique) (Hughes)	Prime farmland is described as farmland with resources available to sustain high levels of production. In Utah, it normally requires irrigation to make prime farmland. 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: http://www.nrcs.usda.gov/wps/portal/nrcs/detail/ut/technical/dma/nri/?cid=nrcs141p2_034092 on 2/6/2014.)	/s/ A. Hughes	5/20/2016
~~PI~~ NI	Fish and Wildlife Excluding USFW Designated Species (Tolbert)	Initial: Calf Creek is used by Native and nonnative fish species. There could be impacts to spawning areas due to excessive sediment. The area is also used for nesting and brood raising by migratory birds. There is a hummingbird monitoring station in the project area, problems with the affects on that monitoring site need to be looked at. Revised: The proposed project would be done outside the migratory bird breeding and brood raising period (August 31 – march 31) when the birds and other animals in the project area would be mature and mobile enough to escape any activities that would adversely affect them. There are no anticipated adverse impacts to wildlife species populations from activities associated with this project.	/s/ T. Tolbert	6/01/2016 11/21/2016
PI	Floodplains (Bradshaw)	The proposed action would improve stability of floodplains in areas of Calf Creek where the existing retaining walls are repaired or replaced.	/s/ K. Bradshaw	5/23/2016
NI	Fuels/Fire Management (Bate)	There would not be an increase or decrease to fuels and fire management as a result of this proposal.	/s/ A. Bate	5/25/2016
NI	Geology / Mineral Resources/Energy Production (Titus)	The proposed action and alternatives are entirely sited within recent alluvium in the valley bottom. No bedrock geologic features would be impacted. No valid existing mineral or energy production leases are in the immediate area.	/s/ Alan Titus	5/25/2016
PI	Hydrologic Conditions (Bradshaw)	The proposed action would affect hydrologic conditions. The use of heavy equipment has the potential for compacting wet soils and decreasing infiltration capacity. Constructing unpaved walkways instead of concrete walkways would improve hydrologic conditions in those areas. Removing concrete campsite pads would improve local hydrologic conditions by increasing the area available for infiltration.	/s/ K. Bradshaw	5/23/2016
NI	Invasive Species/Noxious Weeds (EO 13112) (Brinkerhoff)	The proposed action would not increase the threat of or spread of invasive/noxious weeds. The equipment would be prewashed prior to arriving on site to mitigate any spread of unknown, invasive, noxious weeds.	/s/ R. Brinkerhoff	5/24/16

Determination	Resource	Rationale for Determination*	Signature	Date
NI	Lands/Access (Foley)	Project area is within the Front Country Zone along the Highway 12 corridor. Project as described would have no negative impacts to land tenure, adjacent land owners, or additional potential future uses. Access to adjacent public lands would be negatively impacted on a short term basis during the construction phase of the project, and would be improved over the long term. Project design and construction should take care to preserve survey markers, bearing trees, and witness corners, if present. Design and implementation should also take care to avoid impacts to valid existing rights in the project area, including an aerial power line right of way issued to Garkane under UTU 52880 and a co located communication line right of way issues to South Central under UTU 52881.	/s/ Mark Foley	05/02/2016
NP	Livestock Grazing (Stewart)	This proposed project in an area that is unavailable for livestock grazing.	/s/ S. Stewart	5/24/16
NP	Native American Religious Concerns (Zweifel)	A cultural resource inventory was completed on 5/11/2016, and no Native American sites were found. This project would be included in GSENM/Native American consultations, but no comments are anticipated.	/s/ M. Zweifel	5/12/2016
NI	Paleontology (Titus)	The proposed action and alternatives are entirely sited within recent alluvium in the valley bottom. No bedrock geologic features would be impacted and therefore no paleontological resources would be affected.	/s/ Alan Titus	5/25/2016
NI	Rangeland Health Standards (Stewart)	The proposed project is in a designated recreation/camping area and the size and scope of the project would not impact rangeland health standards.	/s/ S. Stewart	5/24/16
PI	Recreation (Beal/Gale)	The proposed action would have an impact on recreational users.	/s/ L. Gale	5/24/16
NI	Socio Economics (Hughes)	The proposed action would not negatively affect the socio economics.	/s/ A. Hughes	5/20/2016
PI	Soils (Bradshaw)	The proposed action would impact soils during construction. The use of heavy equipment has the potential for compacting wet soils. Grading of soils has to potential for increasing erosion and design features for sediment and erosion control during construction and replacing vegetation after construction would mitigate soil loss.	/s/ K. Bradshaw	5/23/2016
NP	Threatened, Endangered or Candidate Plant Species (Brinkerhoff)	There are no known threatened, endangered or candidate plant species or habitat within the proposed project area.	/s/ R. Brinkerhoff	5/24/16

Determination	Resource	Rationale for Determination*	Signature	Date
NI	Threatened, Endangered or Candidate Animal Species (Tolbert)	Initial: No threatened, endangered, or candidate species have been detected in the campground area. The project area does not occur in designated critical habitat for those species. Revised: No threatened, endangered, or candidate species have been detected in the campground area. However suitable habitat is located there for Mexican spotted owls, yellow billed cuckoos and Southwestern willow flycatchers. Mexican spotted owls have been detected in the Calf Creek drainage and Southwestern willow flycatchers have been detected in the Escalante river drainage. The project area does not occur in designated critical habitat for any of these species. If the work is completed outside the breeding and brood raising period (April 1 August 31) for these animals there would be no impact to the species, if the work must be done within the breeding and brood raising period consultation with US Fish and Wildlife Service would be required and the NI would need to be changed to a PI.	/s/ T. Tolbert	6/01/2016 11/21/2016
NI	Wastes (hazardous or solid) (Pierson)	Heavy equipment would be used for this project. The reportable quantity of fuel and hydraulic fluid are high. Spill containment is available and would be used to prevent contamination of the stream and/or the soil.	/s/ B. Pierson	5/25/16
PI	Water Resources/Quality (drinking/surface/ground) (Bradshaw)	The proposed action could decrease water quality for a short period of time while construction occurs. Design features for sediment and erosion control during construction would mitigate impacts to water resources. After visiting the site it was determined that there may be potential impacts to water quality. The area is used heavily by vehicles entering and exiting the campground and the replacement of the low water crossing with a culvert crossing would be beneficial to water quality by keeping vehicles and associated contaminants (e.g., fluids and mud) out of the stream. Construction of a new parking area and grading the area adjacent to the water play area would have short term insignificant impacts to water resources.	/s/ K. Bradshaw	6/2/2016
PI	Wetlands/Riparian Zones (Brinkerhoff)	The proposed actions would affect the wetland/riparian zone.	/s/A. Hughes	5/20/16
PI	Wild and Scenic Rivers (Gale)	The proposed project occurs adjacent to a river segment that is managed for WSR suitability. The segment has a tentative classification of recreation where it flows through the campground. Design features would protect wild and free flowing nature of Calf Creek, water quality and outstanding remarkable values; high quality scenic, bird habitat and riparian habitat, and prehistoric site. The suitable segment has a tentative classification of scenic below the Lower Falls down to the campground site and recreational classification within the campground and below to the Escalante River.	/s/ L. Gale	5/23/16
NI	Wilderness/WSA (Beal/Gale)	The footprint of the proposed action as shown is outside of the boundaries of the Phipps Death Hollow WSA, which lies on the edges of the developed footprint containing the campground and day use facilities.	/s/ L. Gale	5/23/16
NI	Woodland/Forestry (Bate)	The proposed action would not affect Forestry/Woodland resources.	/s/ A. Bate	5/25/2016

Determination	Resource	Rationale for Determination*	Signature	Date
PI	Vegetation Excluding USFWS Designated Species (Hughes)	The proposed action would affect vegetation.	/s/ A. Hughes	5/20/16
PI	Visual Resources (Angus)	Project is located in a VRM Class 2 area. Contrast ratings to be conducted to determine impacts and conformance with VRM objectives.	/s? A. Angus	5/2/2016
NP	Wild Horses and Burros (Stewart)	There are no Wild Horse and Burro Herd Management Areas within GSENM.	/s/S. Stewart	5/24/16
NP	Lands with Wilderness Characteristics (Beal/Gale)	There are no inventoried units of Lwc present in the project area.	/s/ L. Gale	5/23/16

FINAL REVIEW

Reviewer Title	Signature	Date	Comments
Environmental Coordinator	/s/ Amber L. Hughes	5/17/2017	
Authorized Officer	Cynthia Staszak	06/16/17	

APPENDIX B

CALF CREEK RECREATION AREA PROJECT AREA MAP

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APPENDIX C

CALF CREEK RECREATION AREA MAP

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APPENDIX D

CALF CREEK RECREATION AREA CONCEPTUAL SITE DESIGNS

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Calf Creek Recreation Site - Improvements Project

08/2015

Grand Staircase - Escalante National Monument

Kilometers
0 0.03 0.06
0 0.0275 0.055
Miles

N

UTM NAD 83 Zone 12
Scale: 1:2,750

No warranty is made by the BLM for use of the data for purposes not intended by the BLM.

BLM

GSENM

BLM - GSENM

Calf Creek Recreation Area Map

08/2016

Grand Staircase - Escalante National Monument

Kilometers
0 0.75 1.5
0 0.75 1.5
Miles

N

UTM NAD 83 Zone 12
Scale: 1:70,000

No warranty is made by the BLM for use of the data for purposes not intended by the BLM.

U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
CALF CREEK RECREATION AREA REDEVELOPMENT

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Know what's below,
Call before you dig.
CALL 2 BUSINESS DAYS IN ADVANCE BEFORE YOU DIG, GRADE, OR EXCAVATE FOR THE MARKING OF UNDERGROUND MEMBER UTILITY SYS

DESIGNERS

NORTHWIND RESOURCE CONSULTING

J-U-B

PROJECT LOCATION

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SITE ACCESS

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

COVER SHEET

CALF CREEK RECREATION AREA REDEVELOPMENT

GRAND STAIRCASE–ESCALANTE NATIONAL MONUMENT UTAH

MARK	DESCRIPTION	DATE	APPROVED

PROJECT NO: 30135-015
DESIGN OFFICE: NORTH WIND DAVIS FALLS
DESIGNED BY: G. THOMSON
DRAWN BY: A. ROSS
CHK'D BY: G. THOMSON
APPROVED BY: C. MCCRAE
DATE: 02/06/2018

G001
SHEET 1 OF 8

FOIA001:01680112

PROJECT NO: 30130-015					
DESIGN OFFICE: NORTH WIND IDAHO FALLS					
DESIGNED BY: B. CARTER					
DRAWN BY: A. RICO					
CHK'D BY: B. CARTER					
APPROVED BY: G. MICO-MM					
DATE: 08/07/2018	MARK	DESCRIPTION	DATE	APPROVED	

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

ALTERNATIVE A PLAN OVERALL

CALF CREEK RECREATION AREA REDEVELOPMENT

GRAND STAIRCASE–ESCALENTE NATIONAL MONUMENT UTAH

SHEET 1 OF 1 EX-1

DOI-2020-08 01891

FOIA001:01680112

PROJECT NO: 30130-015					
DESIGN OFFICE: NORTH WIND IDAHO FALLS					
DESIGNED BY: B. CARTER					
DRAWN BY: A. RICO					
CHK'D BY: B. CARTER					
APPROVED BY: G. MECHAM					
DATE: 06/07/2018	MARK	DESCRIPTION	DATE	APPROVED	

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

ALTERNATIVE B PLAN OVERALL

CALF CREEK RECREATION AREA REDEVELOPMENT

GRAND STAIRCASE–ESCALENTE NATIONAL MONUMENT UTAH

SHEET 1 OF 1

EX-2

WATER PLAY AREA ACCESS CONCEPT PLAN
SCALE: NTS

WATER PLAY AREA ACCESS CONCEPT CROSS SECTION
SCALE: NTS

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

WATER PLAY AREA ACCESS

CALF CREEK RECREATION AREA REDEVELOPMENT

GRAND STAIRCASE–ESCALANTE NATIONAL MONUMENT

UTAH

MARK	DESCRIPTION	DATE	APPROVED

PROJECT NO: 30135-015
DESIGN OFFICE: NORTH WIND FALLS
DESIGNED BY: S. THERRIEN
DRAWN BY: A. RICE
CHECKED BY: S. THERRIEN
APPROVED BY: D. MECHAM
DATE: 02/26/2018

C502
SHEET 4 OF 8

ELEVATION VIEW

PLAN VIEW

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

KIOSK PLAN & ELEVATION

CALF CREEK RECREATION AREA REDEVELOPMENT

GRAND STAIRCASE–ESCALANTE NATIONAL MONUMENT UTAH

MARK	DESCRIPTION	DATE	APPROVED

PROJECT NO: 30135-015
DESIGN OFFICE: NORTH WEST EARTH FALLS
DESIGNED BY: S. TAERSON
DRAWN BY: A. ROSS
CHECKED BY: S. TAERSON
APPROVED BY: G. MOSHAW
DATE: 02/06/2018

SHEET C503
5 OF 8

PERSPECTIVE VIEW

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

KIOSK CONCEPT

CALF CREEK RECREATION AREA REDEVELOPMENT

GRAND STAIRCASE–ESCALANTE NATIONAL MONUMENT UTAH

MARK	DESCRIPTION	DATE	APPROVED

PROJECT NO. 30135-015
DESIGN OFFICE: NORTH WEND EARD FALLS
DESIGNED BY: G. TAERSON
DRAWN BY: A. ROSS
CHECKED BY: G. TAERSON
APPROVED BY: G. WEDDAM
DATE: 02/06/2018

SHEET C504 OF 8

ELEVATION

PERSPECTIVE

ELEVATION

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

PAVILION CONCEPT

CALF CREEK RECREATION AREA REDEVELOPMENT

GRAND STAIRCASE–ESCALANTE NATIONAL MONUMENT UTAH

MARK	DESCRIPTION	DATE	APPROVED

PROJECT NO. 30135-015
DESIGN OFFICE: NORTH WEST IDAHO FALLS
DESIGNED BY: G. THOMSEN
DRAWN BY: A. ROSS
CHECKED BY: G. THOMSEN
APPROVED BY: G. MOSHAW
DATE: 02/06/2018

C505
SHEET 7 OF 8

PERSPECTIVE

PERSPECTIVE

ELEVATION

GRAND STAIRCASE ESCALANTE MONUMENT - INSPIRATION FOR STAIR DESIGN

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

PICNIC SHELTER CONCEPT

CALF CREEK RECREATION AREA REDEVELOPMENT

GRAND STAIRCASE–ESCALANTE NATIONAL MONUMENT UTAH

MARK	DESCRIPTION	DATE	APPROVED

PROJECT NO. 30135-015
DESIGN OFFICE: NORTH WEST FALLS
DESIGNED BY: S. TAERSON
DRAWN BY: A. ROSS
CHECKED BY: S. TAERSON
APPROVED BY: G. WEDDAM
DATE: 02/06/2018

C506
SHEET 8 OF 8

XXX ITEMS IN THIS COLOR ARE MY FIRST CUT AT NOT SUBSTANTIVE...SEE WHAT YOU THINK

COMMENT ANALYSIS AND RESPONSE TO PUBLIC COMMENTS

During the 30-day comment period, BLM received 14 emails or letters from 14 individuals. Comments received pertained to the following:

- support or lack of support for either Alternative A or Alternative B or aspects of the two alternatives
- timing of project construction during high visitation season as well as during hummingbird study
- validity of the purpose and need and the description of the existing conditions
- potential competition with local businesses
- potential impacts to Lower Calf Creek Falls Trail and the resources associated with the trail
- change in existing character of the recreation site
- design of the campground and trailhead improvements
- accommodation of groups
- recreation planning in the vicinity

(b)(5) DPP [redacted]

BLM's responses to the substantive public comments (as defined in H-1790-1 NEPA Handbook, page 66) are included in Table 5.2. below.

Topic	Comment	BLM Response
Alt B support	I support the full alternative (B) for Calf Creek Campground Improvements. This includes support for the increased parking area, toilet facility, and upgraded picnic area and facilities. This campground and trail is beloved by large numbers of visitors to GSENM, and has been for more than fifty years. It is time to make improvements, and those recommended in this EA look to be appropriate.	
Alt B support	I support Alternative "B" the full alternative that includes the redevelopment of the parking area to accommodated 50 cars. The Calf Creek Recreation site provides one of the best-developed and best known opportunities for visitors to experience the Monument. The fact that this site is already developed and is easily accessed from Highway 12 makes it the right place to provide increased visitor capability. The site is clearly underdeveloped today for the amount of use and as the EA states; the existing parking along Highway 12 poses a safety, environmental, and visual problem. The Grand Staircase Escalante National Monument was established to preserve an important environmental ecosystem, and extensive archeological and paleontology assets in a mostly primitive condition. The very significant	

	increased interest in this part of the BLM's Conservation Lands portfolio is clearly threatening the ability for BLM to provide long-term protection for this landscape. The proposed improvements outlined in Alternative "B" to the Calf Creek Recreation Area are a very positive step in the right direction to mitigate the impacts of a rapidly increasing visitation to the Monument and, I believe, is the right place to concentrate the increased use.	
Alt B support	I support the Alternative B proposal. Hopefully, something can be worked out to accommodate some hikers during this time period, if possible. Good luck in getting the project done. Sounds good!	
Alt A preference	Preserve the trees. If plans suggest tree removal, then change the plan. I note that Alt B mentions the loss of "one or two" trees to make room for parking. For me, that eliminates Alt B therefore, I prefer Alt A.	
Support for project	We are in favor of anything that helps the Monument manage the heavy traffic around the Calf Creek Recreation Area. Any temporary shutdown of access to these areas during construction and improvements is fine with us. Pete Rognli - The Wildland Trekking Company	
Support for project	Seems the improvements are warranted	
Scheduling during high visitation season issue	As a past manager of the visitor services program at GSENM and member of the Garfield County Board of Tourism, I can say without doubt that doing construction during the highest Monument visitor use season of Sept-October versus the lower use season of summer (July-August) **will** cause significant negative public relations. *Construction is not pretty, but the long-term benefits outweigh the need for disturbance in this location in the summer season.* I recall that wildlife survey work can be done to identify bird nests and also to assure that no birds are killed in the process.	
Scheduling during high visitation season issue	The one concern that I have with the proposal is the proposed timing of the construction starting in September which I believe, corresponds with the highest visitation times in September and October. I understand the concern for avoiding the nesting season but believe the management of the visitation during the most intense time will cause more impact to the area than the impact to the nesting period if the construction is allowed to overlap that time.	
Scheduling during high visitation season issue	The work is mostly to be done in the fall months on through the winter. September and October are usually very busy months for visiting the area, including Calf Creek Falls.	
Scheduling during high visitation season issue	I'd just like to comment on the timing of the proposed improvements September October are some of the busiest times of the campground. Recently, Deer Creek Campground was improved, but those were delayed until the end of October, when the heaviest use had subsided for the season. I encourage GSENM to reconsider in order to lessen the impact of visitors to the Monument.	

Scheduling during high visitation season issue	On behalf of our Family Business we would like the BLM to reconsider the closing dates on this project. This is absolutely a critical time for visitation to our area and we believe this would be a problem for travels as well as local businesses. Please consider being more flexible and possibly using July and August as prework time when visitation is lower.	
Scheduling during high visitation season issue	As President of the Escalante/Boulder Chamber of Commerce I would like to express our concern with the timing of thisproject. As you know, September and October are two of our busiest months for travelers. September is the month when hundreds of artists come to the area to paint for the Escalante Canyons Art festival, and Calf Creek is one of the areas they flock to. October is the month for the Escalante Marathon. Calf Creek is the premiere destination for travelers at this time. Please reconsider the timing on this project. Perhaps some of the work could be done in July and August and completed in November. Thank you for considering these options.	
Scheduling during high visitation season issue	On page the bottom of page 2 of the Environmental Assessment document, DOIBLMUT030020150040EA December 2016 Calf Creek Recreation Area Site Improvements, it is stated that, "If approved, BLM deferred maintenance funds and recreation site user fees would be used to complete the proposed improvements; many of which would be constructed only during the fall and winter months (September through March) beginning in 2017, though others would be implemented in subsequent years as funding allows." Comment: "I feel very strongly that the month of September must be removed from consideration for any type of closure in the Calf Creek Recreation area to accommodate the construction of improvements. September is one of the busiest months in this location, if not the busiest month. The displacement of visitors during September is an unreasonable and unnecessary inconvenience to the many visitors that travel here and expect to use and experience Calf Creek Recreation Area in what is also, in my opinion, the most beautiful month of the year here in Garfield County, Utah." Member Garfield County Travel Council Member Utah State Board of Tourism Development Outfitter Guide in GSENM and Bryce Canyon National Park Board Member GSENM Partners Scenic Byway 12 Foundation Director	
Scheduling during hummingbird study	The EA states that construction could begin in September. Hummingbird banding is still occurring during this time. While birds are not using the surrounding habitat for breeding, they are using it for migration. The monitoring of hummingbirds has been going on in the Calf Creek Recreation Area for seven years. Monitoring allows among other things, the ability to deduce trends. The addition of construction activities makes it impossible to obtain meaningful assumptions and conclusions since activities are well outside the norm. This concern and effects goes beyond the one Calf Creek site. The Forest Service and GSENM are active contributors to the Hummingbird Monitoring Network which incorporates partners from Canada to Mexico and Guatemala. Numerous states in the west are a part of this survey effort with numerous sites in some individual states. The large dataset and the survey protocol of banding	

	during the same time period is a massive effort to produce meaningful data for the conservation of these species. Consideration of this should be serious, and activities should not proceed until banding is completed for the year. This usually occurs the second week of September.	
Competition with local businesses	I appreciate your intentions to increase the availability to the public, however, it seems like the Government campground is in direct competition with Private Enterprises. Since the Government controls the access and availability to the scenic site (Calf Creek Falls), then that should be what they focus on, improving the access and availability, i.e. more parking, more access to the swimming area, more availability to ADA travelers. That is their job. It is not the Government's job to be in direct competition with Private Enterprises (campgrounds or RV parks) who have invested personal time, money and energy to develop services to compliment the scenic area in which we live. If we, Private Enterprise and Government, were on a level playing field it would not be so onerous but we are not. The government TAKES the most scenic sites, SUBSIDIZES the development and building of the campground, (with our tax dollars or borrowed funds from China), then UNDERCUTS Private Enterprise by charging lower fees than what Private Enterprise must charge because Private Enterprise must pay all the Government fees, licenses and taxes. It would be wise to remember businesses pay taxes in this country to support the Government. Government should NOT be in direct competition with Private Enterprises. That is not Government's job. Government's job is to make it possible for businesses to succeed so businesses can pay their fair share of tax that allows for the good things we enjoy in this country, such as providing for the common defense giving us relative safety, freedom of speech, freedom of religion, freedom to assemble, freedom to travel, trial by jury and property rights. Government should stick to what Government is supposed to do, not compete with Private Enterprise. Thank you for the opportunity to express my opinion. I appreciate our freedom of speech. Private RV park/campground owner	
existing character	I fear that these improvements could lead to the loss of the current character of the rec area. The CG has a charm that can be destroyed by too many changes. Keep the natural charm. Preserve charm.	
existing character	I am concerned about the character of this beloved place being compromised in a futile attempt to accommodate ever increasing crowds. Calf Creek still possesses the charm of a bygone era, it is a sensitive, spiritual and special place for many. Places like Calf Creek are disappearing, eaten up by the machine of tourism.	

	I feel like a better use of money would be to develop an additional campground at the Tin Can Flat location at the top of HoleIntheRock Road. This site is already impacted and heavily used by campers. I think at the very least a toilet and some barriers to prevent the disturbed area from growing would be far more valuable than compromising Calf Creek's cherished character in an impossible attempt at accommodating everyone.	
Trail	Even though the Calf Creek trail and waterfall are mentioned in the affected environment/resources portion, *impacts to the trail, waterfall, water quality, cultural resources, etc. are not addressed in any of the alternative A/B discussions.* Sure they are not located *at* the campground, but they will certainly be affected. I speak for myself, but I suspect others would agree " Build it and they will come..." Adding more parking capacity will increase the already high impacts occuring along the trail: erosion, social trails, pooping & trampling, impact to water quality, etc. I'm also concerned for the welfare of the red pictographs 1/2 way up the trail at #8. There is already a social trail forming which leads across the valley bottom. (That social trail needs to be naturalized and hidden.) Other cultural sites in the canyon may very well become impacted by increased use brought about by increased parking. A physical limit on parking should help limit the impacts associated with popularity. Generally, it seems to me that these "improvements" at the campground/day use area are designed without serious consideration for associated impacts they would bring to the trail, the resources along it, and to the waterfall. Do everything possible to eliminate parking along Hwy 12 for safety concerns and to limit numbers along the trail.	
Trail	In addition, I feel like the EA fails to consider the increased impacts to the trail that are inevitable with increasing capacity at the campground and parking areas. There is already a proliferation of social trails, graffiti, erosion, toilet paper and human feces along the trail.	
Trail	Preserve the trail.	
Tent pads	I am definitely opposed to ... building tent pads like the ones at Deer Creek Campground. They are overbuilt, unattractive and present trip hazards.	
Tent pads	Please don't construct platforms like those at Deer Creek CG. Those are too tall bump your shin, twist ankle at night, etc. Tent pads should be lower to the ground.	
Tent pads	If tent pads proposed in the Calf Creek campground are anything like the ones in Deer Creek Campground, then the proposal will be successful in excluding groups of more than 4 people per site just by design. This does not meet the Purpose and Need to improve the quality of recreation activities, nor to improve recreational experiences. This cannot be accomplished by being selective for some groups and exclusive of others. This is another example of how this project would benefit from the knowledge and experience of a Recreation Manager.	
Vault toilet	I fully support fixing or replacing or even adding a vault toilet, ...	

Vault toilet by bridge	Recreating the toilet at west side of foot bridge sounds like a good idea. Especially for time of year when water is off.	
Picnic tables	Finally regarding these structures, the Accessibility Guidelines do not require the removal of existing structures that do not provide mobility features. The Guidelines requires picnic units that are altered or added to provide mobility features until the number of units meets the minimum number as required in F245.2.1 or F245.2.2 as stated in the CFR. Therefore, when altering picnic units in this proposal, the scoping requirements apply only to the picnic units that are altered until the required minimum number of picnic units with mobility features is provided. The Guidelines also states that an exception permits the agency "to not provide accessible elements when altering individual elements within picnic units that are not designated to provide mobility features." When all the elements within a picnic unit are altered, the altered picnic unit must provide mobility features until the required minimum number of units with mobility features is provided. The statement in the Purpose and Need is misleading, insinuating that these structures don't meet accessibility guidelines and therefore need to be removed which is most certainly not the case. This surreptitious action to invent a need to remove these items is inappropriate. If needed, please add the necessary mobility features to the day use site. For example, when replacing the cement supports for the picnic tables, provide room at the end of the table to accommodate for mobility and install new hardened paths and an accessible grill and accompanying prep table.	
Low water crossing	However I personally enjoyed the low water concrete river crossing ; also good for little dogs & children to cool off their paws/feet.	
Volley ball court reuse	I fully support... removing or otherwise reutilizing the abandoned volley ball court.	
Foot bridge	I fully support ... repairing the foot bridge...	
Site 12	The proposal to take out the existing campsite (currently #12) and replace it with walk-in sites 15, 16, and 17 does not meet the Purpose and Need. In the past, flood warning signs have been located above the stream at the site closest to the water ford crossing. I have firsthand knowledge that the area of the proposed sites 15, 16, & 17 has flooded twice, and that is just my observations. Certainly one would expect that it has happened more than twice. While large flood events do not commonly happen in Calf Creek and is dependent on storm cells located just right upstream, they do occur. On these two separate occasions, I walked down into the area of the proposed sites and examined the high water mark including debris on the rock wall to the east and surrounding vegetation. The high water mark was approximately twelve inches high and then on the second instance eight inches. The stream	

	channel morphology changes at the play area and bottlenecks into a narrow waterway causing flood waters to inundate the area. If safety is a Purpose and Need, then these sites should not be placed here. The continuance of this action will result in significant effects to public health and safety (40 CFR 1508.27(b)(2)), thereby requiring the proposed activities be analyzed in an EIS.	
Fences	Please don't construct the site divider "fences" like at Deer Creek. Unattractive, detract from nature. Rocks look better in my opinion, blend better, nicer character, useful to sit on. How about natural veg? Shrubs?	
Retaining walls	As stated in the document, the area is within the HWY 12 Special Recreation Management Area where the recreation experience is to focus on learning about various resources including biology. When the GSENM used to host Walks-and-Talks, many of the local families including my own attended Larry Glickman's talks on bats as well as scorpions. The retaining wall, especially in the parking area and along the road west of the walking bridge provides the cracks and crevasses necessary for scorpions to hunt at night for insects. Our family never misses a chance to take black lights and see how many scorpions they can count when we visit in the evening. I have personal knowledge that other families from Escalante also do this same thing. Recently, my youngest reminded all of us that he had counted 11 scorpions one night and wondered if he would break that record next time we went. I would hope that the rock retaining wall would not be removed as the GSENM has started a tradition that many local families enjoy. If there is an actual need, the biologist should be consulted on the design of the rock wall in an effort to continue to provide this experience and habitat.	
Fee station	Constructing a small fee station near the entrance from Highway 12 will not meet the Purpose and Need. The new kiosk shown in C503 does not contain a fee station. Having only one fee station near the highway will cause traffic congestion and inconvenience users; likely resulting in fees not being collected. Traffic congestion will likely occur as a result of several situations and includes but is not limited to: 1) A vehicle passes the fee station and parks in the existing lot and realizes they missed the fee station and either drives back up the hill if the parking lot isn't full or walks up the hill to pay the fee; 2) A camper enters the campground and finds a camping spot. Not wanting to lose the site the camper walks up to the highway and pays their fee; 3) A vehicle parks at the fee station and pays, then wanting to get closer drives down to the lower lot and parks again; 4) As has been observed many times, the visitor is only interested in first finding a parking spot so the individual or members of the group or family can first use the restroom before proceeding to pay only to find out afterwards that the fee tube is up near the Highway. All of this can be solved by having a fee station by the highway so that visitors that park there can retrieve their cash from their vehicle before leaving the area and also having a fee tube where the existing one is located so that fees can be paid without the inconvenience of walking up the highway to pay.	(b)(5) DPP [redacted]

Amphitheater	The construction of a 50 person amphitheater is not supported by the Purpose and Need. What has been identified is the need for camping and day use areas. The GSENM discontinued their Walks-and-Talks program when Larry Glickman was here. A program does not exist that would support a need for an amphitheater. However, if you were to build a group campsite, an amphitheater might be used by these groups. The need for more camping and day use sites is an obvious need, and should take precedence over an amphitheater that is not supported in the stated Purpose and Need.	
Parking	Please don't expand the main parking area. Keep some limit on parking to help limit numbers on the trail. If parking must be expanded, then limit any increase to the "overflow" sites.	
Parking	Do everything possible to eliminate parking along Hwy 12 for safety concerns and to limit numbers along the trail.	
Tree removal	I am definitely opposed to removing any trees	
Tree removal	Preserve the trees. If plans suggest tree removal, then change the plan. I note that Alt B mentions the loss of "one or two" trees to make room for parking. For me, that eliminates Alt B therefore, I prefer Alt A. Preserve the trees. Anything done at the water play area needs to preserve the trees. Very important!	
Trash collection needed	I was appalled when I went there and after picking up some litter (my usual custom), there weren't any trash cans available . Want to improve something ? Don't pretend it's trash free environment .... especially in the rest rooms.	
Off site projects	I feel like a better use of money would be to develop an additional campground at the Tin Can Flat location at the top of HoleIntheRock Road. This site is already impacted and heavily used by campers. I think at the very least a toilet and some barriers to prevent the disturbed area from growing would be far more valuable than compromising Calf Creek's cherished character in an impossible attempt at accommodating everyone.	
Off site projects	A better use for this money would be the instalation of toilet facilities at the upper Calf Creek falls trailhead and other areas where dispersed camping human waste issues are a concern to the BLM and the public.	
User conflicts	The EA states in the Purpose and Need that overflow camping in the day use areas and the parking lot "...creates conflicts between those using the area for camping or day use and damages vegetation and soils." This statement is remarkably inconsistent with what I have observed. In the seven years of survey work, there has not been a single	

(b)(5) DPP [redacted]

	time where overflow campers kept their overnight gear setup past the early morning hours. Occasionally, these campers have been observed to stay an extra hour or so after their tent and gear is packed to heat something warm to drink or cook a quick meal on a camp stove. Also, I would estimate that during half of our visits we do not find any overflow camping in the day use area. We often converse with these campers as they are interested in the work that we are doing. As a result of these conversations, we have learned that many of these campers head up the trail in the early morning in an effort to avoid the heat that comes later in the day. Day users occasionally use the area for lunch before heading up the trail and primarily consist of families. One might suggest that we are merely not observing this conflict occurring. In response to that, I give the following factual information; whether campers are present or absent, day use observations are identical. No "conflicts" as described in the EA have ever been observed between campers and day users. I am not suggesting that conflicts never occur between the two uses. However, this potential and occasional situation does not warrant proposed actions in an alternative. When proposed activities are developed as a result of an inaccurate Purpose and Need, the corresponding activities are invalid.	
Camping	One other item worth noting because of the inaccurate determinations made in the Purpose and Need is the camping in the parking lot in vehicles. The EA implies this is a result of the campground being filled to capacity. Evidence suggests that parking lot camping occurs due to the late arrival of the user rather than lack of space in the day use or campground area. This is supported by the fact that space is available in either the day use or campground area when vehicle campers have been observed during hummingbird banding.	
Camping	The cover letter for the EA states this is the most visited site on GSENM. A full spectrum of campers utilize the area from large groups to families to single person use. In visiting with some of these campers, we have been told that friends meet and camp together each year. We have also observed two vehicles in a single site (where they can accommodate them) during most of our visits in a professional capacity as well as personal. While a diverse array of campers use this campground, neither of the proposed alternatives accommodate this diversity, rather it caters to and is trending toward campers made up of 1-4 people. There is a reason that locals are calling it Subaru Campground II with Deer Creek Campground being Subaru Campground I. The mere notion of the local population using disparaging nicknames should be a red flag to those proposing changes. It is disturbing and offensive that recreational activities that have been available to small and large groups and families for years are being phased out and excluded from camping opportunities when an obvious need still exists. The proposed changes at Calf Creek appear to cater to the new trend found in the "upgraded" Deer Creek Campground where longer axel vehicles do not have adequate parking and tent pads are only big enough for a 3-4 person tent just to name a couple issues. Because of the tent pad configuration and sizes, accommodating more than 4 would likely cause resource damage. The lack of suitable camping for groups greater than 4 is manifested in	

	its use. Of all the camping that occurred in 2016 in Deer Creek, only 11 individual groups contained more than 4 individuals. None of the sites in the Deer Creek Campground would accommodate my family of five. None of the tent pads are big enough for our configuration of tents including one large 6 person tent or two 3 person tents. Even the parking is a concern and a hazard due to efforts to restrict and manage for single vehicle use. Doors on both sides of a small vehicle have been observed hitting the rocks that line the parking spots, causing damage to the visitor's doors. The remodel of the Deer Creek Campground manifests some serious issues in how campgrounds are being managed and designed and is a testament of why groups greater than four should be concerned with the proposals for the Calf Creek Recreation Area.	
Camping	The proposal to remove larger campsites in favor of walk in sites and limit parking at campsites does not consider the needs of families and groups greater than four as well as those with small camping vehicles. The proposal to eliminate two vehicle parking also does not consider the needs of existing campers. Just this past August, we met two couples from Panguitch that come each year at the same time. Their two vehicles were in one of the few sites that can accommodate it and they had two tents set up.	
Camping	The proposed removal of Site #12 will result in the loss of one of the few campsites that can adequately accommodate a family or a small group. Why remove existing asphalt in what is being labeled as Site #12 and 14 displayed on EX-1 and 2 when this type of use is already limited? I have been told similar stories from GSENM employees and I myself have brought two vehicles as part of our family had to come later in the evening. Regardless of the scenario that results in two vehicles, there is an obvious need. GSENM employees have expressed to me that this isn't really an issue and generally people park two vehicles in the sites that can accommodate it. Any issues have been easily remedied. There is no harm in having the few campsites that can accommodate two vehicles providing for that situation and experience that is currently occurring. The proposed reclamation of the sites that can provide two vehicle parking in not needed. It is duplicitous to claim vegetative and soil damage to support a proposal on one hand and then turn around and propose to expand the road width, increase parking areas including within the campground, and create new sites next to the riparian area. The design of limiting parking to one vehicle also affects other types of campers. The few camping sites with larger parking footprints also accommodate small pull behind campers and campers attached to truck beds which are almost always observed at the recreation site.	
Camping	The elimination by design of families and small groups is also evident in the 6 person limit for a campsite. Now families of seven or more can't camp there? In 2016, there were 75 separate camping groups that used and paid for the campground that had more than 6 people at their site. This number would likely be higher if the campground had more sites that accommodated these groups. Obviously there is a need to continue to provide camping to groups of more than the proposed arbitrary limit of 6. There is nothing stated in the Purpose and Need pointing to	

(b)(5) DPP [redacted]

	an issue of too many individuals at a campsite. Nor has this been observed for that matter. A general trend of actions including the Deer Creek Campground, Dance Hall Rock Restroom, group limits, and now Calf Creek has and is occurring that has a distasteful and offensive strategy against cultural values, families and groups of people in general.	
Camping	As stated earlier, an existing condition that has not been addressed and is curiously absent from discussion is the need for designated group camping. Through my encounters with the public and my own observations as well as those of GSENM employees, it is obvious that there is a need. I have been asked on many occasions if there is group camping at Calf Creek. Existing use also supports there is a need. In 2016, there were 22 groups consisting of 269 individuals that camped at the Calf Creek Campground that consisted of 10 or more people. This information highlights that there is a lack of transparency to the public in portions of the Purpose and Need. The proposal will not allow camping in the day use area, limit the numbers of individuals at a camp site, limit parking to one vehicle, and remove the group area, being circuitous in eliminating use of the campground by large groups. However, the EA does not provide this information in the existing conditions to the public. Therefore, comments are being solicited on these individual elements without all of the facts that could influence how the project is viewed as a whole. If all of these proposed activities are implemented, then groups will not be allowed to stay in the campground. This lack of transparency and withholding of vital information to the public is against regulations. This obvious need and existing conditions must be presented to the public so that all pertinent information can be evaluated. Please provide an alternative that includes a designated group camping site. A possible location is where the amphitheater is proposed and/or south of there in the opening where the weedy grass occurs.	
Camping	Many of the proposed changes or additions to the campground and day use area are based on this inaccurate representation of existing conditions. They include changing or removing the group day use area, creating new walk-in sites, changing the existing day use sites, and building an amphitheater in the current overflow area. Another existing condition that has not been addressed and is curiously absent from discussion is the need for designated group campsites, and the use of the recreation area by families or small groups. Had GSENM personnel been consulted this would have become evident in the discussions as it was with mine.	
Day Use	The EA states "...there is little demand for group use..." the evidence of which seems to be based off of the 2-4 times a year the day use site was reserved. The reservation records obviously do not provide a complete picture of actual use. Consistent firsthand knowledge cannot and should not be substituted with site reservations and occasional observations with the expectation of having an accurate account of existing conditions. Again, an accurate account of existing conditions is paramount in developing an accurate, meaningful, and relevant Purpose and Need and	

	consequential project activities. From my observations both professional and personal, as well as those that maintain the site, this is an inaccurate account of the existing conditions at the group day use site. Use by individual families that are caravanning together, people using the site together and spaced out among the tables and sharing the grill and food prep area, our busses, university/school busses and family reunion groups are just a few examples that have frequently been observed **using the group day use site**. I would estimate that 90% of the time when we are leaving the campground after hummingbird monitoring that the group day use site is being utilized by more than one group. In fact, 40 groups made up of 10 or more individuals and consisting of a total of 1,442 individuals paid for day use recreational opportunities. While an exact number of those individuals that used the group day use site cannot be determined, the observations disclosed above combined with the documented day use fees indicates that the group day use site is well used.	
Historic structures	The Purpose and Need also states that "Some facilities are deteriorating, create safety concerns, and do not meet the *Architectural Barriers Act Accessibility Guidelines for Outdoor Developed Areas.*" The historical structures included in this list that are of personal and local concern is the masonry grill, group tables and the vault toilet which is the rock structure next to the swinging bridge. The EA failed to disclose that 23 years ago, the old vault toilet was refurbished and does not function as a toilet, but rather a storage building. was unaware that this building used to be a vault toilet until just a few years ago. It is curious that the description of this building was not based on its current status and instead of what it used to be, the interpretation of which could insinuate disposability. Why would someone care that an old vault toilet be disposed of? However, the disposal of a natural stone storage building built in the 1960s that has no apparent reason to be removed may raise questions among the average reader. These historic structures should be preserved. Two items are listed in the EA under Conformance with BLM Land Use Plan, (pages 3 and 4), but does not include HIST-1 which is applicable to not only cultural properties but historic as well. Page 18 of the GSENM Plan speaks to historical sites associated with local communities. It states that the overall objective with respect to historic resources and that applies to these structures include: Identify, document, and protect the historic resources of the Monument; increase public education and appreciation of historic resources through interpretation; and facilitate appropriate research on historic resources so that the Monument is recognized as an outdoor classroom and laboratory for the preservation, study, and appreciation of cultural heritage. The proposed activities are not in compliance with the GSENM Plan by disposing of these historical structures. It may be as the GSENM Plan says, "...the oral histories and folklore of the sites and landscapes remain largely undocumented." The masonry grill along with all of the first recreational developments were completed on June 30, 1963. Stories have been relayed to me of local Lions Club, Forest Service and BLM employee gatherings, family,	

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	and church groups using the group area and use of the food prep area and grill. My extended family, as well as groups of friends, often use this site with the grill and long tables. These structures should be left for people to continue to enjoy, not be dismissed with a flippant "...thorough architectural and photographic documentation..." as disclosed on page 11 of the EA.	
Cultural resources	Even though the Calf Creek trail and waterfall are mentioned in the affected environment/resources portion, *impacts to the trail, waterfall, water quality, cultural resources, etc. are not addressed in any of the alternative A/B discussions.* Sure they are not located *at* the campground, but they will certainly be affected. I speak for myself, but I suspect others would agree " Build it and they will come..." Adding more parking capacity will increase the already high impacts occuring along the trail: erosion, social trails, pooping & trampling, impact to water quality, etc. I'm also concerned for the welfare of the red pictographs 1/2 way up the trail at #8. There is already a social trail forming which leads across the valley bottom. (That social trail needs to be naturalized and hidden.) Other cultural sites in the canyon may very well become impacted by increased use brought about by increased parking. A physical limit on parking should help limit the impacts associated with popularity. Generally, it seems to me that these "improvements" at the campground/day use area are designed without serious consideration for associated impacts they would bring to the trail, the resources along it, and to the waterfall.	
Water quality	Even though the Calf Creek trail and waterfall are mentioned in the affected environment/resources portion, *impacts to the trail, waterfall, water quality, cultural resources, etc. are not addressed in any of the alternative A/B discussions.* Sure they are not located *at* the campground, but they will certainly be affected. I speak for myself, but I suspect others would agree " Build it and they will come..." Adding more parking capacity will increase the already high impacts occuring along the trail: erosion, social trails, pooping & trampling, impact to water quality, etc. I'm also concerned for the welfare of the red pictographs 1/2 way up the trail at #8. There is already a social trail forming which leads across the valley bottom. (That social trail needs to be naturalized and hidden.) Other cultural sites in the canyon may very well become impacted by increased use brought about by increased parking. A physical limit on parking should help limit the impacts associated with popularity. Generally, it seems to me that these "improvements" at the campground/day use area are designed without serious consideration for associated impacts they would bring to the trail, the resources along it, and to the waterfall.	
NEPA Purpose and Need / Existing Conditions	The existing conditions described in the Purpose and Need are erroneous on many counts, and therefore many of the proposed activities are inappropriate, some of which will undoubtedly result in new issues. A substantial portion of my comments are rooted in the inaccuracy of portions of the Purpose and Need and the resulting proposed activities. An accurate account of existing conditions is paramount in developing a correct, meaningful, and relevant purpose and need and consequential project activities. An existing condition serves as the basis for	

	identifying environmental conditions and environmental effects. The desired condition is the image of land and resource conditions attained by accomplishing the goals and objectives of the GSENM Management Plan as well as other statutes, regulations, and plans. The "need for change" represents the differences which surface during the comparison between the existing and desired conditions. These needs for change become the foundation for the "purpose and need" for a future proposed action. When existing conditions are inaccurate, then possible management activities developed from that basis will not enable you to move from existing conditions toward achievement of your desired conditions because they are inherently inaccurate.	
NEPA Purpose and Need and Existing conditions	The BLM website states that the NEPA process and reasonable alternatives should be used "…to inform decisions not to justify already-made decisions." Evidence suggests that much of the proposed activities are already-made decisions. The appropriate employees that have intimate knowledge of the recreation site should have played a significant role in the development of the project. While remedies to obvious needs of the site are included in the proposal, such as increasing available parking, unsupported needs based on incomplete or inaccurate existing conditions are numerous. The resulting proposals that exclude families, small groups, and large groups should be corrected. The diversity of recreational opportunities should match the need and the diversity of the existing users while honoring local interests and history. I ask that the Purpose and Need be re-evaluated in conjunction with the proposed actions. While this project addresses the need for improving the Calf Creek Recreation Area, it does so based on inaccurate and misleading information. In order to receive the support of those who use these facilities, the GSENM must be transparent and inclusive with its proposed actions and base such changes on unbiased information.	
NEPA Website	The EA for this project was difficult to locate on the internet. For future projects, please consider the addition of more information to your scoping letter in the third paragraph. The webpage given was accessed to the "Text Search" tab as instructed. However, after choosing the appropriate "State(s)" and "Offices(s)" options in the dropdown menu, it became apparent that I needed to do an advanced search since too many results were displayed. Once in the "Advanced Search" section of the website it may be helpful to explain in your scoping letter that the reference number given for the project is the "NEPA #" that needs to be entered. Even being a government employee with another agency, it took me several tries to enter the project number into the correct location to acquire the document successfully. Others without this background will have a more difficult time as is apparent by the fact that I had three separate individuals inform me that they could not locate the document using the same instructions and asked for my assistance.	This has been frustrating and I believe I have found a better way to direct people to find documents in ePlanning.

Deer Creek Campground	There is a reason that locals are calling it Subaru Campground II with Deer Creek Campground being Subaru Campground I. The mere notion of the local population using disparaging nicknames should be a red flag to those proposing changes. Of all the camping that occurred in 2016 in Deer Creek, only 11 individual groups contained more than 4 individuals. None of the sites in the Deer Creek Campground would accommodate my family of five. None of the tent pads are big enough for our configuration of tents including one large 6 person tent or two 3 person tents. Even the parking is a concern and a hazard due to efforts to restrict and manage for single vehicle use. Doors on both sides of a small vehicle have been observed hitting the rocks that line the parking spots, causing damage to the visitor's doors. The remodel of the Deer Creek Campground manifests some serious issues in how campgrounds are being managed and designed and is a testament of why groups greater than four should be concerned with the proposals for the Calf Creek Recreation Area.	
Staff involvement	In contemplating how my own consistent observations could be so off base of what is described in the Purpose and Need, I inquired and compared information from BLM personnel that maintain the site almost on a daily basis during the visitation season. Their observations are consistent with my own that are presented in these comments. I find it odd and reprehensible that these personnel that have intimate knowledge of the difficulties that face this "…most visited recreation site in the Monument…" were not an intricate part of the planning of this project, giving them the opportunity to provide invaluable knowledge. Again, an accurate account of existing conditions is paramount in developing an accurate, meaningful, and relevant Purpose and Need and consequential project activities. It is culpable that persons with indispensable and meaningful knowledge were not involved in this development. It begs the question why wouldn't someone who is planning the improvements for a recreation area that receives the most use on the Monument not rely on these employees. One of these employees relayed to me that his involvement consisted of him being asked a single question during a field trip during the design phase, after most of the proposed activities were developed. This employee would not have even attended the field trip had an engineer not invited him. The resulting inaccurate and incomplete information, to the detriment of the recreation area, also begs the question why the Recreation Planner was not the lead on the most recreated site, with design support from engineers and a landscape architect to meet the true needs. If it was a question of availability of the Recreation Planner, then a decision to wait would have been the most prudent option considering the importance and use of the site.	
Establishment of credibility to provide statements	The basis of my claim that portions of the existing conditions are inaccurate is based on my professional observations and experiences as a federal employee, my personal observations and experiences, and professional and personal observations relayed to me by GSENM employees that have an intimate knowledge of the Calf Creek Recreation Area. For the past **seven** years I have conducted hummingbird surveys in the day use area from May	

	thru September **every two weeks**. We arrive at the campground at or before sunrise, set up, stay for five hours according to monitoring protocol, pack up our equipment, and many times drive through the campground before heading back to the Escalante office. This process enables us to observe what is occurring before campers are awake and also what develops and transpires well into lunchtime activities and the beginnings of the busy visitation use of the day. In addition, the BLM and Forest Service coordinate the maintenance of the hummingbird feeders at this site; requiring changing feeders every other day during portions of the summer allowing us to observe activities during all times of the day. The BLM and Forest Service also conduct bat surveys each year that require setup in the late afternoon and early evening. In addition to these observations in a professional capacity, my family frequently uses the day use area during various times in the visitation season, both during the mid-day hours to use the water play area (usually with other families), and the evening hours for family cook-outs. I have also observed activities at the day use and camping areas as our family often rents the campsite east of the foot bridge (currently #12), for cookouts and camping since it is one of the few sites that accommodates our family. One would hope that this unequivocally extensive and consistent observation time would merit careful reconsideration of the "conflicts" as described in the Purpose and Need.	
Vegetation damage	I have also observed during all of my visits, both professional and personal, that tent campers try to avoid vegetative areas as the invasive species *Tribulus terrestis* (i.e. puncture vine) occupy the area. Since we have worked there during this time, we actively remove these plants during slower periods of our survey work. In addition to the puncture vine, the large flat area north of the west-side picnic table contains a large patch of rat-eared barley (*Hordeum murinum*), a weedy grass that last season was mixed with globe mallow. No camping has been observed in that area since the weedy grass has dominated that site along with other weedy plants that tent campers typically avoid. While it is true that campers tend to avoid vegetative areas, it isn't an issue because vegetation is sparse surrounding the two southern day use sites where camping occurs. It is interesting that vegetational damage is used to support some proposed activities where weedy plants occur, but other proposed activities remove large areas of vegetation like the area proposed next to the creek (proposed Sites #15, 16, and 17).	
Restrooms along HWY 12	The recreation section of the EA, page 18, states that the Calf Creek Recreation Area provides "...the only public toilet facilities along the 28-mile stretch connecting Escalante and Boulder." This makes it sound like a burden to either use a restroom at Boulder or wait the 45 minutes to get to Escalante. This is hardly extreme in any instance among tourist traveling in southern Utah from one National Park or Recreation Area to another.	
Restroom	Speaking of , there are alternative rest room designs that maximize light and ventilation.	

design		

Lisa Young - Comments for the Calf Creek Recreation Improvement (DOI_BLM-UT-0300-2015-0040-EA)

The EA for this project was difficult to locate on the internet. For future projects, please consider the addition of more information to your scoping letter in the third paragraph. The webpage given was accessed to the "Text Search" tab as instructed. However, after choosing the appropriate "State(s)" and "Offices(s)" options in the dropdown menu, it became apparent that I needed to do an advanced search since too many results were displayed. Once in the "Advanced Search" section of the website it may be helpful to explain in your scoping letter that the reference number given for the project is the "NEPA #" that needs to be entered. Even being a government employee with another agency, it took me several tries to enter the project number into the correct location to acquire the document successfully. Others without this background will have a more difficult time as is apparent by the fact that I had three separate individuals inform me that they could not locate the document using the same instructions and asked for my assistance.

The existing conditions described in the Purpose and Need are erroneous on many counts, and therefore many of the proposed activities are inappropriate, some of which will undoubtedly result in new issues. A substantial portion of my comments are rooted in the inaccuracy of portions of the Purpose and Need and the resulting proposed activities. An accurate account of existing conditions is paramount in developing a correct, meaningful, and relevant purpose and need and consequential project activities. An existing condition serves as the basis for identifying environmental conditions and environmental effects. The desired condition is the image of land and resource conditions attained by accomplishing the goals and objectives of the GSENM Management Plan as well as other statutes, regulations, and plans. The "need for change" represents the differences which surface during the comparison between the existing and desired conditions. These needs for change become the foundation for the "purpose and need" for a future proposed action. When existing conditions are inaccurate, then possible management activities developed from that basis will not enable you to move from existing conditions toward achievement of your desired conditions because they are inherently inaccurate.

The basis of my claim that portions of the existing conditions are inaccurate is based on my professional observations and experiences as a federal employee, my personal observations and experiences, and professional and personal observations relayed to me by GSENM employees that have an intimate knowledge of the Calf Creek Recreation Area. For the past **seven** years I have conducted hummingbird surveys in the day use area from May thru September **every two weeks**. We arrive at the campground at or before sunrise, set up, stay for five hours according to monitoring protocol, pack up our equipment, and many times drive through the campground before heading back to the Escalante office. This process enables us to observe what is occurring before campers are awake and also what develops and transpires well into lunchtime activities and the beginnings of the busy visitation use of the day. In addition, the BLM and Forest Service coordinate the maintenance of the hummingbird feeders at this site; requiring changing feeders every other day during portions of the summer allowing us to observe activities during all times of the day. The BLM and Forest Service also conduct bat surveys each year that require setup in the late afternoon and early evening. In addition to these observations in a professional capacity, my family frequently uses the day use area during various times in the visitation season, both during the mid-day hours to use the water play area (usually with other families), and the evening hours for family cook-outs. I have also observed activities at the day use and camping areas as our family often rents the campsite east of the foot bridge (currently #12), for cookouts and camping since it is one of the few sites that accommodates our family. One would hope that this unequivocally

extensive and consistent observation time would merit careful reconsideration of the "conflicts" as described in the Purpose and Need.

In contemplating how my own consistent observations could be so off base of what is described in the Purpose and Need, I inquired and compared information from BLM personnel that maintain the site almost on a daily basis during the visitation season. Their observations are consistent with my own that are presented in these comments. I find it odd and reprehensible that these personnel that have intimate knowledge of the difficulties that face this "…most visited recreation site in the Monument…" were not an intricate part of the planning of this project, giving them the opportunity to provide invaluable knowledge. Again, an accurate account of existing conditions is paramount in developing an accurate, meaningful, and relevant Purpose and Need and consequential project activities. It is culpable that persons with indispensable and meaningful knowledge were not involved in this development. It begs the question why wouldn't someone who is planning the improvements for a recreation area that receives the most use on the Monument not rely on these employees. One of these employees relayed to me that his involvement consisted of him being asked a single question during a field trip during the design phase, after most of the proposed activities were developed. This employee would not have even attended the field trip had an engineer not invited him. The resulting inaccurate and incomplete information, to the detriment of the recreation area, also begs the question why the Recreation Planner was not the lead on the most recreated site, with design support from engineers and a landscape architect to meet the true needs. If it was a question of availability of the Recreation Planner, then a decision to wait would have been the most prudent option considering the importance and use of the site.

The EA states in the Purpose and Need that overflow camping in the day use areas and the parking lot "…creates conflicts between those using the area for camping or day use and damages vegetation and soils." This statement is remarkably inconsistent with what I have observed. In the seven years of survey work, there has not been a single time where overflow campers kept their overnight gear setup past the early morning hours. Occasionally, these campers have been observed to stay an extra hour or so after their tent and gear is packed to heat something warm to drink or cook a quick meal on a camp stove. Also, I would estimate that during half of our visits we do not find any overflow camping in the day use area. We often converse with these campers as they are interested in the work that we are doing. As a result of these conversations, we have learned that many of these campers head up the trail in the early morning in an effort to avoid the heat that comes later in the day. Day users occasionally use the area for lunch before heading up the trail and primarily consist of families. One might suggest that we are merely not observing this conflict occurring. In response to that, I give the following factual information; whether campers are present or absent, day use observations are identical. No "conflicts" as described in the EA have ever been observed between campers and day users. I am not suggesting that conflicts never occur between the two uses. However, this potential and occasional situation does not warrant proposed actions in an alternative. When proposed activities are developed as a result of an inaccurate Purpose and Need, the corresponding activities are invalid.

I have also observed during all of my visits, both professional and personal, that tent campers try to avoid vegetative areas as the invasive species *Tribulus terrestis* (i.e. puncture vine) occupy the area. Since we have worked there during this time, we actively remove these plants during slower periods of our survey work. In addition to the puncture vine, the large flat area north of the west-side picnic table contains a large patch of rat-eared barley (*Hordeum murinum*), a weedy grass that last season was

mixed with globe mallow. No camping has been observed in that area since the weedy grass has dominated that site along with other weedy plants that tent campers typically avoid. While it is true that campers tend to avoid vegetative areas, it isn't an issue because vegetation is sparse surrounding the two southern day use sites where camping occurs. It is interesting that vegetational damage is used to support some proposed activities where weedy plants occur, but other proposed activities remove large areas of vegetation like the area proposed next to the creek (proposed Sites #15, 16, and 17).

One other item worth noting because of the inaccurate determinations made in the Purpose and Need is the camping in the parking lot in vehicles. The EA implies this is a result of the campground being filled to capacity. Evidence suggests that parking lot camping occurs due to the late arrival of the user rather than lack of space in the day use or campground area. This is supported by the fact that space is available in either the day use or campground area when vehicle campers have been observed during hummingbird banding.

Many of the proposed changes or additions to the campground and day use area are based on this inaccurate representation of existing conditions. They include changing or removing the group day use area, creating new walk-in sites, changing the existing day use sites, and building an amphitheater in the current overflow area. Another existing condition that has not been addressed and is curiously absent from discussion is the need for designated group campsites, and the use of the recreation area by families or small groups. Had GSENM personnel been consulted this would have become evident in the discussions as it was with mine.

The cover letter for the EA states this is the most visited site on GSENM. A full spectrum of campers utilize the area from large groups to families to single person use. In visiting with some of these campers, we have been told that friends meet and camp together each year. We have also observed two vehicles in a single site (where they can accommodate them) during most of our visits in a professional capacity as well as personal. While a diverse array of campers use this campground, neither of the proposed alternatives accommodate this diversity, rather it caters to and is trending toward campers made up of 1-4 people. There is a reason that locals are calling it Subaru Campground II with Deer Creek Campground being Subaru Campground I. The mere notion of the local population using disparaging nicknames should be a red flag to those proposing changes.

It is disturbing and offensive that recreational activities that have been available to small and large groups and families for years are being phased out and excluded from camping opportunities when an obvious need still exists. The proposed changes at Calf Creek appear to cater to the new trend found in the "upgraded" Deer Creek Campground where longer axel vehicles do not have adequate parking and tent pads are only big enough for a 3-4 person tent just to name a couple issues. Because of the tent pad configuration and sizes, accommodating more than 4 would likely cause resource damage. The lack of suitable camping for groups greater than 4 is manifested in its use. Of all the camping that occurred in 2016 in Deer Creek, only 11 individual groups contained more than 4 individuals. None of the sites in the Deer Creek Campground would accommodate my family of five. None of the tent pads are big enough for our configuration of tents including one large 6 person tent or two 3 person tents. Even the parking is a concern and a hazard due to efforts to restrict and manage for single vehicle use. Doors on both sides of a small vehicle have been observed hitting the rocks that line the parking spots, causing damage to the visitor's doors. The remodel of the Deer Creek Campground manifests some serious

issues in how campgrounds are being managed and designed and is a testament of why groups greater than four should be concerned with the proposals for the Calf Creek Recreation Area.

If tent pads proposed in the Calf Creek campground are anything like the ones in Deer Creek Campground, then the proposal will be successful in excluding groups of more than 4 people per site just by design. This does not meet the Purpose and Need to improve the quality of recreation activities, nor to improve recreational experiences. This cannot be accomplished by being selective for some groups and exclusive of others. This is another example of how this project would benefit from the knowledge and experience of a Recreation Manager.

The proposal to remove larger campsites in favor of walk in sites and limit parking at campsites does not consider the needs of families and groups greater than four as well as those with small camping vehicles. The proposed removal of Site #12 will result in the loss of one of the few campsites that can adequately accommodate a family or a small group. The proposal to eliminate two vehicle parking also does not consider the needs of existing campers. Just this past August, we met two couples from Panguitch that come each year at the same time. Their two vehicles were in one of the few sites that can accommodate it and they had two tents set up. Why remove existing asphalt in what is being labeled as Site #12 and 14 displayed on EX-1 and 2 when this type of use is already limited? I have been told similar stories from GSENM employees and I myself have brought two vehicles as part of our family had to come later in the evening. Regardless of the scenario that results in two vehicles, there is an obvious need. GSENM employees have expressed to me that this isn't really an issue and generally people park two vehicles in the sites that can accommodate it. Any issues have been easily remedied. There is no harm in having the few campsites that can accommodate two vehicles providing for that situation and experience that is currently occurring. The proposed reclamation of the sites that can provide two vehicle parking in not needed. It is duplicitous to claim vegetative and soil damage to support a proposal on one hand and then turn around and propose to expand the road width, increase parking areas including within the campground, and create new sites next to the riparian area. The design of limiting parking to one vehicle also affects other types of campers. The few camping sites with larger parking footprints also accommodate small pull behind campers and campers attached to truck beds which are almost always observed at the recreation site.

The elimination by design of families and small groups is also evident in the 6 person limit for a campsite. Now families of seven or more can't camp there? In 2016, there were 75 separate camping groups that used and paid for the campground that had more than 6 people at their site. This number would likely be higher if the campground had more sites that accommodated these groups. Obviously there is a need to continue to provide camping to groups of more than the proposed arbitrary limit of 6. There is nothing stated in the Purpose and Need pointing to an issue of too many individuals at a campsite. Nor has this been observed for that matter. A general trend of actions including the Deer Creek Campground, Dance Hall Rock Restroom, group limits, and now Calf Creek has and is occurring that has a distasteful and offensive strategy against cultural values, families and groups of people in general.

As stated earlier, an existing condition that has not been addressed and is curiously absent from discussion is the need for designated group camping. Through my encounters with the public and my

own observations as well as those of GSENM employees, it is obvious that there is a need. I have been asked on many occasions if there is group camping at Calf Creek. Existing use also supports there is a need. In 2016, there were 22 groups consisting of 269 individuals that camped at the Calf Creek Campground that consisted of 10 or more people. This information highlights that there is a lack of transparency to the public in portions of the Purpose and Need. The proposal will not allow camping in the day use area, limit the numbers of individuals at a camp site, limit parking to one vehicle, and remove the group area, being circuitous in eliminating use of the campground by large groups. However, the EA does not provide this information in the existing conditions to the public. Therefore, comments are being solicited on these individual elements without all of the facts that could influence how the project is viewed as a whole. If all of these proposed activities are implemented, then groups will not be allowed to stay in the campground. This lack of transparency and withholding of vital information to the public is against regulations. This obvious need and existing conditions must be presented to the public so that all pertinent information can be evaluated.

Please provide an alternative that includes a designated group camping site. A possible location is where the amphitheater is proposed and/or south of there in the opening where the weedy grass occurs.

The construction of a 50 person amphitheater is not supported by the Purpose and Need. What has been identified is the need for camping and day use areas. The GSENM discontinued their Walks-and-Talks program when Larry Glickman was here. A program does not exist that would support a need for an amphitheater. However, if you were to build a group campsite, an amphitheater might be used by these groups. The need for more camping and day use sites is an obvious need, and should take precedence over an amphitheater that is not supported in the stated Purpose and Need.

The EA states "…there is little demand for group use…" the evidence of which seems to be based off of the 2-4 times a year the day use site was reserved. The reservation records obviously do not provide a complete picture of actual use. Consistent firsthand knowledge cannot and should not be substituted with site reservations and occasional observations with the expectation of having an accurate account of existing conditions. Again, an accurate account of existing conditions is paramount in developing an accurate, meaningful, and relevant Purpose and Need and consequential project activities. From my observations both professional and personal, as well as those that maintain the site, this is an inaccurate account of the existing conditions at the group day use site. Use by individual families that are caravanning together, people using the site together and spaced out among the tables and sharing the grill and food prep area, tour busses, university/school busses, and family reunion groups are just a few examples that have frequently been observed **using the group day use site**. I would estimate that 90% of the time when we are leaving the campground after hummingbird monitoring that the group day use site is being utilized by more than one group. In fact, 40 groups made up of 10 or more individuals and consisting of a total of 1,442 individuals paid for day use recreational opportunities. While an exact number of those individuals that used the group day use site cannot be determined, the observations disclosed above combined with the documented day use fees indicates that the group day use site is well used.

The proposal to take out the existing campsite (currently #12) and replace it with walk-in sites 15, 16, and 17 does not meet the Purpose and Need. In the past, flood warning signs have been located above

the stream at the site closest to the water ford crossing. I have firsthand knowledge that the area of the proposed sites 15, 16, & 17 has flooded twice, and that is just my observations. Certainly one would expect that it has happened more than twice. While large flood events do not commonly happen in Calf Creek and is dependent on storm cells located just right upstream, they do occur. On these two separate occasions, I walked down into the area of the proposed sites and examined the high water mark including debris on the rock wall to the east and surrounding vegetation. The high water mark was approximately twelve inches high and then on the second instance eight inches. The stream channel morphology changes at the play area and bottlenecks into a narrow waterway causing flood waters to inundate the area. If safety is a Purpose and Need, then these sites should not be placed here. The continuance of this action will result in significant effects to public health and safety (40 CFR 1508.27(b)(2)), thereby requiring the proposed activities be analyzed in an EIS.

The Purpose and Need also states that "Some facilities are deteriorating, create safety concerns, and do not meet the *Architectural Barriers Act Accessibility Guidelines for Outdoor Developed Areas."* The historical structures included in this list that are of personal and local concern is the masonry grill, group tables and the vault toilet which is the rock structure next to the swinging bridge. The EA failed to disclose that 23 years ago, the old vault toilet was refurbished and does not function as a toilet, but rather a storage building. I was unaware that this building used to be a vault toilet until just a few years ago. It is curious that the description of this building was not based on its current status and instead of what it used to be, the interpretation of which could insinuate disposability. Why would someone care that an old vault toilet be disposed of? However, the disposal of a natural stone storage building built in the 1960s that has no apparent reason to be removed may raise questions among the average reader. These historic structures should be preserved.

Two items are listed in the EA under <u>Conformance with BLM Land Use Plan</u>, (pages 3 and 4), but does not include HIST-1 which is applicable to not only cultural properties but historic as well. Page 18 of the GSENM Plan speaks to historical sites associated with local communities. It states that the overall objective with respect to historic resources and that applies to these structures include: Identify, document, and protect the historic resources of the Monument; increase public education and appreciation of historic resources through interpretation; and facilitate appropriate research on historic resources so that the Monument is recognized as an outdoor classroom and laboratory for the preservation, study, and appreciation of cultural heritage. The proposed activities are not in compliance with the GSENM Plan by disposing of these historical structures.

It may be as the GSENM Plan says, "…the oral histories and folklore of the sites and landscapes remain largely undocumented." The masonry grill along with all of the first recreational developments were completed on June 30, 1963. Stories have been relayed to me of local Lions Club, Forest Service and BLM employee gatherings, family, and church groups using the group area and use of the food prep area and grill. My extended family, as well as groups of friends, often use this site with the grill and long tables. These structures should be left for people to continue to enjoy, not be dismissed with a flippant "…thorough architectural and photographic documentation…" as disclosed on page 11 of the EA.

Historic preservation should not be dismissed. These structures provide value through repeated use and cultural benefits. The GSENM has an obligation to respect this historic community resource and preserve it for future generations. An example of this disregard for historic and cultural sites is the covering of some of the wagon wheel ruts by the Dance Hall Rock project. While not all of the sites

were covered, some most certainly were. The GSENM Plan recognizes the importance of historical sites and the proposed project should as well. The long, sturdy wooden tables provide a design and character that is not available with the new tables. The cement tables that have replaced the old tables at some of the sites are a visual eyesore. In addition to being very unattractive, they are not fully functional, bowing up in the middle; causing food and cooking items to roll off. The long wooden tables provide the best setting for large groups and families to sit together and enjoy each other's company. Please preserve these tables by replacing the cement supports. The masonry grill has been part of the neighboring community and family events since 1963. Just last summer, we used the grill and prep area with our friends. Finally, as for the rock structure that serves as a storage building, it is also a quaint historic structure that adds character to the recreation area and should also be preserved. Its historic value should not be discounted because it does not fit into new plans.

Finally regarding these structures, the Accessibility Guidelines do not require the removal of existing structures that do not provide mobility features. The Guidelines requires picnic units that are altered or added to provide mobility features until the number of units meets the minimum number as required in F245.2.1 or F245.2.2 as stated in the CFR. Therefore, when altering picnic units in this proposal, the scoping requirements apply only to the picnic units that are altered until the required minimum number of picnic units with mobility features is provided. The Guidelines also states that an exception permits the agency "to not provide accessible elements when altering individual elements within picnic units that are not designated to provide mobility features." When all the elements within a picnic unit are altered, the altered picnic unit must provide mobility features until the required minimum number of units with mobility features is provided. The statement in the Purpose and Need is misleading, insinuating that these structures don't meet accessibility guidelines and therefore need to be removed which is most certainly not the case. This surreptitious action to invent a need to remove these items is inappropriate. If needed, please add the necessary mobility features to the day use site. For example, when replacing the cement supports for the picnic tables, provide room at the end of the table to accommodate for mobility and install new hardened paths and an accessible grill and accompanying prep table.

As stated in the document, the area is within the HWY 12 Special Recreation Management Area where the recreation experience is to focus on learning about various resources including biology. When the GSENM used to host Walks-and-Talks, many of the local families including my own attended Larry Glickman's talks on bats as well as scorpions. The retaining wall, especially in the parking area and along the road west of the walking bridge provides the cracks and crevasses necessary for scorpions to hunt at night for insects. Our family never misses a chance to take black lights and see how many scorpions they can count when we visit in the evening. I have personal knowledge that other families from Escalante also do this same thing. Recently, my youngest reminded all of us that he had counted 11 scorpions one night and wondered if he would break that record next time we went. I would hope that the rock retaining wall would not be removed as the GSENM has started a tradition that many local families enjoy. If there is an actual need, the biologist should be consulted on the design of the rock wall in an effort to continue to provide this experience and habitat.

The EA states that construction could begin in September. Hummingbird banding is still occurring during this time. While birds are not using the surrounding habitat for breeding, they are using it for migration. The monitoring of hummingbirds has been going on in the Calf Creek Recreation Area for seven years. Monitoring allows among other things, the ability to deduce trends. The addition of construction

activities makes it impossible to obtain meaningful assumptions and conclusions since activities are well outside the norm. This concern and effects goes beyond the one Calf Creek site. The Forest Service and GSENM are active contributors to the Hummingbird Monitoring Network which incorporates partners from Canada to Mexico and Guatemala. Numerous states in the west are a part of this survey effort with numerous sites in some individual states. The large dataset and the survey protocol of banding during the same time period is a massive effort to produce meaningful data for the conservation of these species. Consideration of this should be serious, and activities should not proceed until banding is completed for the year. This usually occurs the second week of September.

Constructing a small fee station near the entrance from Highway 12 will not meet the Purpose and Need. The new kiosk shown in C503 does not contain a fee station. Having only one fee station near the highway will cause traffic congestion and inconvenience users; likely resulting in fees not being collected. Traffic congestion will likely occur as a result of several situations and includes but is not limited to: 1) A vehicle passes the fee station and parks in the existing lot and realizes they missed the fee station and either drives back up the hill if the parking lot isn't full or walks up the hill to pay the fee; 2) A camper enters the campground and finds a camping spot. Not wanting to lose the site the camper walks up to the highway and pays their fee; 3) A vehicle parks at the fee station and pays, then wanting to get closer drives down to the lower lot and parks again; 4) As has been observed many times, the visitor is only interested in first finding a parking spot so the individual or members of the group or family can first use the restroom before proceeding to pay only to find out afterwards that the fee tube is up near the Highway. All of this can be solved by having a fee station by the highway so that visitors that park there can retrieve their cash from their vehicle before leaving the area and also having a fee tube where the existing one is located so that fees can be paid without the inconvenience of walking up the highway to pay.

The recreation section of the EA, page 18, states that the Calf Creek Recreation Area provides "…the only public toilet facilities along the 28-mile stretch connecting Escalante and Boulder." This makes it sound like a burden to either use a restroom at Boulder or wait the 45 minutes to get to Escalante. This is hardly extreme in any instance among tourist traveling in southern Utah from one National Park or Recreation Area to another.

The BLM website states that the NEPA process and reasonable alternatives should be used "…to inform decisions – not to justify already-made decisions." Evidence suggests that much of the proposed activities are already-made decisions. The appropriate employees that have intimate knowledge of the recreation site should have played a significant role in the development of the project. While remedies to obvious needs of the site are included in the proposal, such as increasing available parking, unsupported needs based on incomplete or inaccurate existing conditions are numerous. The resulting proposals that exclude families, small groups, and large groups should be corrected. The diversity of recreational opportunities should match the need and the diversity of the existing users while honoring local interests and history. I ask that the Purpose and Need be re-evaluated in conjunction with the proposed actions. While this project addresses the need for improving the Calf Creek Recreation Area, it does so based on inaccurate and misleading information. In order to receive the support of those who use these facilities, the GSENM must be transparent and inclusive with its proposed actions and base such changes on unbiased information.