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Cc: cindy staszak[cstaszak@blm.gov]
From: Matthew Betenson
Sent: 2017-11-13T10:31:52-05:00
Importance: Normal
Subject: Fwd: Dry Fork TH
Received: 2017-11-13T10:33:36-05:00
[ATT00001.htm](#)
[Dry Fork AltB 9 20 2017.pdf](#)
[EA_DryFork.pdf](#)
[ATT00002.htm](#)

Good morning,

I spoke with Brian on Friday about Dryfork and Garfield County's concerns about the location to stop a hole in the rock Road. They received a call from Todd Phillips, permittee, on the project. I tried to send Brian this information last Friday but it bounced back from his email. I hope to be able to follow up with Brian at some point today. But I wanted to let everyone know what was happening.

Thanks-Matt

Sent from my iPhone

Begin forwarded message:

From: "Betenson, Matthew" <mbetenso@blm.gov>
To: Brian Bremner <engineer@color-country.net>
Subject: Dry Fork TH

Hi Brian,

After speaking with you, Alan Bate let me know that he spoke with Todd about the situation. Todd has sent a comment letter with his concerns, we may meet with him soon to talk about it if he is willing.

Understand that we moved the proposed trail head location on HITR Road further south based upon initial concerns raised by Todd earlier in the process. The location on the map are the ones we visited with you and Commissioner Taylor in the field when went to look at Dance Hall Rock. There is a lot of "good" in the project including signage for the slot canyons and better information for the public...plus the vault toilets--human waste is becoming a big issue in that spot. We are conscious of the permittee livestock operation in area and do not want to effect them.

Currently, we are at the draft EA place in the processes in a public comment period. We're happy to present the project at the County meeting on the 27th, if that makes sense for you.

Please let me know if you need more information.

Thanks-
Matt

--

Matt Betenson
Associate Monument Manager

Grand Staircase-Escalante National Monument
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United States Department of the Interior Bureau of Land Management

Environmental Assessment

DOI-BLM-UT-0300-2015-0038-EA

November 2017

Dry Fork Slot Canyon Trailhead Relocation

Location: Salt Lake Meridian
Township 38 South, Range 6 East, Section 36 NW1/4
Township 38 South, Range 6 East, Section 27 SW1/4NE1/4

Grand Staircase-Escalante National Monument
669 South Hwy 89A
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Dry Fork Slot Canyon Trailhead Relocation

DOI-BLM-UT-0300-2015-0038-EA-Dry Fork Slot Canyon Trailhead

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Dry Fork Slot Canyon Trailhead Relocation
DOI-BLM-UT-0300-2015-0038-EA-Dry Fork Trailhead

1.0 PURPOSE & NEED

1.1 Introduction and Background

The Bureau of Land Management (BLM), Grand Staircase-Escalante National Monument (GSENM) is proposing to relocate the Dry Fork Slot Canyon Trailhead from its current location within the Scorpion Wilderness Study Area (Scorpion WSA), to two new separate sites along BLM road #252 and BLM road #200. Two alternatives are being considered, a no action alternative and the proposed action alternative. See Appendix C – Alternative B Map for project location and area.

The Dry Fork Slot Canyon Trailhead is the access point to the Dry Fork Slot Canyon Narrows; Peek-a-boo, Spooky, and Brimstone slot canyons. From Highway 12, the Hole-in-the-Rock road provides access to the Dry Fork Slot Canyon Trailhead. This trailhead is located within the Scorpion WSA and the Primitive Management Zone of GSENM.

The Scorpion WSA was established in 1984; a trailhead register along with safety and interpretive signs were installed at the site in 1991. The trailhead was user created and currently accommodates about 30 vehicles. There are no parking area boundaries allowing for uncontrolled expansion of the area. The BLM road #252 was also user created, approximately 1.6 miles in length and is not maintained. The GSENM has identified road #252 on the Travel Management System (TMS) and it is in conflict with designation of Scorpion WSA.

This EA is a site-specific analysis of potential impacts that could result with the implementation of a proposed action or alternatives to the proposed action. The EA assists the BLM in project planning and ensuring compliance with the National Environmental Policy Act (NEPA), and in making a determination as to whether any “significant” impacts could result from the analyzed actions. Significance is defined by NEPA and is found in regulation 40 CFR 1508.27. An EA provides evidence for determining whether to prepare an Environmental Impact Statement (EIS) or a statement of “Finding of No Significant Impact” (FONSI). If the decision maker determines that this project has “significant” impacts following the analysis in the EA, then an EIS would be prepared for the project. If not, a Decision Record (DR) may be signed for the EA approving the selected alternative, whether the proposed action alternative or the no action alternative. A DR, including a FONSI statement, documents the reasons why implementation of the selected alternative would not result in “significant” environmental impacts (effects) beyond those already addressed in the Grand Staircase-Escalante National Monument Management Plan (*February 2000*).

1.2 The Purpose and Need for the Proposed Action

The need for this proposed action is to address the issues of the current trailhead location and visitor impacts at Dry Fork Slot Canyon trailhead. It currently resides within the Scorpion WSA and the Primitive Zone of GSENM. Visitation increases at the Dry Fork Slot Canyon Trailhead have amplified impacts to the area. With an increase in visitation, impairments to WSA

administered lands are occurring such as, negative affects to biological resources, expansion of parking, and improper human waste disposal. The proposed action would continue to provide a trailhead and trail access for the Dry Fork Slot Canyons.

The purpose of the proposed action is to follow guidance set by Federal Lands Policy and Management Act (FLPMA), which requires the BLM to manage all WSAs “so as not to impair the suitability of such areas for preservation as wilderness.” The BLM may remove structures and other facilities that impair wilderness characteristics, do not meet any of the exception to non-impairment, or are not permissible uses as detailed in section 1.6.D of the BLM Manual 6330 - *Management of BLM Wilderness Study Areas*.

1.3 Decision to be Made

The BLM must decide whether to move the trailhead outside the Scorpion WSA to better manage for the non-impairment standard and construct two new trailheads to accommodate recreation needs for the Dry Fork Trail. The proposed action needs to be consistent with applicable management plans and regulation and include design features to protect public health and safety, and the environment.

1.4 Conformance with BLM Land Use Plan(s)

The proposed action described below is in conformance with the GSENM Monument Management Plan (MMP) (February 2000) and is supported in 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-11** The condition of routes and distance from communities in the Passage Zone makes it a secondary zone for visitation. Similar facilities as allowed in the Frontcountry Zone could be provided for resource protection, visitor safety, or for the interpretation of Monument resources. Information kiosks approximately the size of two 3 foot by 5 foot panels will be located at major trailheads and smaller kiosks or signs will be located at less used trailheads. Rarely used trailheads will be identified with a small sign.
- **WSA-1** Existing WSAs in the Monument will be managed under the BLM’s Interim Management Policy (IMP) and Guidelines for Lands Under Wilderness Review (BLM Manual H-8550-1) until legislation takes effect to change their status.* The major objective of the IMP is to manage lands under wilderness review in a manner that does not impair their suitability for designation as wilderness. In general, the only activities permissible under the IMP are temporary uses that create no new surface disturbance nor involve permanent placement of structures. Temporary, non-disturbing activities, as well as activities governed by valid existing rights, may generally continue in WSAs.

**Information Bulletin No. 2012-093, National Landscape Conservation System Policy Development.* This IB informs BLM on the updates to BLM Manuals. Effective July 13, 2012 BLM Manual 6330- *Management of Wilderness Study Areas* replaces the Interim Management Policy for Lands Under Wilderness Review.

- **REV-1** Many factors will be considered when deciding to implement a revegetation or restoration strategy. Each project and area to be treated will be evaluated to determine the appropriate strategy. The following general guidelines can be applied to determine which strategy is the most appropriate and how it will be implemented in order to be consistent with the overall vegetation management objectives.
 - REV-1.3. Revegetation strategies will be used in areas of heavy visitation, where site stabilization is desired.

- **Management Zone Descriptions**

Management zones are used in this Plan to display various management emphases and strategies that will best fulfill the established purposes of the Monument and the overall vision described in Chapter 2 of the Monument Management Plan (2000).

The **Frontcountry Zone** (78,056 acres or 4 percent of the Monument) is intended to be the focal point for visitation by providing day-use opportunities in close proximity to adjacent communities and to Highways 12 and 89 which traverse the Monument.

The **Passage Zone** (39,037 acres or 2percent of the Monument) includes secondary travel routes which receive use as throughways and recreation destinations.

The **Outback Zone** (537,748 acres or 29 percent of the Monument) is intended to provide an undeveloped, primitive, and self-directed visitor experience while accommodating motorized and mechanized access on designated routes.

The **Primitive Zone** (1,210,579 acres or 65 percent of the Monument) is intended to provide an undeveloped, primitive, and self-directed visitor experience without motorized or mechanized access.

1.5 Relationship to Statutes, Regulations, or Other Plans

The proposed alternatives are consistent with federal environmental laws and regulations, Executive orders, and Department of Interior and GSENM policies. It is in compliance 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.

- **BLM Manual 6220 – National Monuments, National Conservation Areas, and Similar Designations**

Provides general policies for the administration and management of such designations, including GSENM. Presidential Proclamation 6920 established GSENM; the design features would ensure that objects and values would be conserved and protected. Consistent with Section 1.6(F)(1), 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.

- **BLM Manual 6330 – Management of BLM Wilderness Study Areas**

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. Consistent with Section 1.6 (C)(3)(b), The BLM may remove structures and other facilities that impair wilderness characteristics, do not meet any of the exceptions to non-impairment, or are not permissible uses as detailed in section 1.6.D of this policy.

- **BLM Manual 6310 – Conducting Wilderness Characteristics Inventory**

This policy contains the Bureau of Land Management's (BLM) guidance and general procedures for conducting wilderness characteristics inventories under Section 201 of the Federal Land Policy and Management Act of 1976 (FLPMA). Managing the wilderness resource is part of the BLM's multiple use mission. Lands with wilderness characteristics provide a range of uses and benefits in addition to their value as settings for solitude or primitive and unconfined recreation.

- **Kane County, UT Resource Management Plan (2011, amended 2015)**

Although Dry Fork Slot Canyon is not specifically mentioned in the Kane County, Utah Resource Management Plan, a review of the document reveals that the Action Alternatives would not conflict with the county plan.

1.6 Identification of Issues

The issues to be addressed in this EA and issues considered but not analyzed in detail were determined by BLM interdisciplinary review of available information. Consideration was given to those elements of the human environment that are subject to requirements specified in regulation or executive order as well as any other resource issues or concerns identified during the interdisciplinary team review.

The BLM Interdisciplinary Team (Appendix A- Interdisciplinary Team Checklist) have identified the following issues:

Issue 1: Recreation

Will the proposed actions affect recreational opportunities and/or the visitor experience?
Will the proposed action change the transportation management system?

Issue 2: Wilderness Study Area (WSA)

Will the proposed actions impair the suitability to preserve the Scorpion WSA for potential designation for Wilderness?

Issue 3: Lands with Wilderness Characteristics

Will the proposed actions be consistent with relevant laws, policies and guidance for Lands with Wilderness Characteristics?

Issue 4: Visual Resources

Will the proposed site developments create visually contrasting impacts that alter the landscape character?

Will the proposed site developments meet the VRM objectives for that area?

1.7 Issues Considered but Eliminated from Further Analysis

An alternative to develop the current trailhead in its present location was considered but eliminated because it did not meet the Non-Impairment Standard defined in BLM Manual 6330 – *Management of BLM Wilderness Study Areas (2012)*.

1.8 Summary

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

2.0 DESCRIPTION OF ALTERNATIVES, INCLUDING PROPOSED ACTION

2.1 Introduction

This Environmental Assessment (EA) focuses on the proposed action and the no action alternative. The no action alternative is considered and analyzed to provide a baseline for comparison of the impacts of the proposed action.

2.2 Alternative A – No Action

Under the no action alternative, BLM would not relocate or further develop the Dry Fork Slot Canyon Trailhead, which is currently inside the Scorpion WSA (See Appendix B – Alternative A Map). The current trailhead would remain as is, the road conditions, human waste disposal, and the expanding parking area would not be addressed. Impacts to the Scorpion WSA would remain inconsistent with BLM Manual 6330 – *Management of Wilderness Study Areas*.

2.3 Alternative B – Proposed Action Alternative - Dry Fork Slot Canyon Trailhead Development Located Outside the Scorpion WSA

The proposed action alternative would develop two new locations for trailheads (See Appendix C – Alternative B Map) and trails to the Dry Fork Slot Canyons. Trailhead A would be placed adjacent to the Dry Fork Trailhead road #252 on the north side and southeast of the existing trailhead. Trailhead B would be west of the Hole-in-the-Rock Road (road #200).

2.3.1 Trailhead A - Development along Road #252

The proposed action would relocate the Dry Fork Slot Canyon Trailhead from its present location, inside the Scorpion WSA, to the proposed locations outside the WSA in the Passage Zone of the Monument.

A new trail section consisting of three miles or 1.4 acres would be developed to tie the new trailhead into the existing trail. This new section of trail would be necessary to protect Monument resources, avoid the potential of social trails, and prevent impairment to the Scorpion WSA.

Design features of this alternative would include:

Trailhead

- Install a visitor education and interpretation kiosk and a standard brown metal trail register.
- The new trail would tie in with the existing trail to lower Peek-A-Boo slot canyon.
- Approximately 0.9 miles of trail would be developed tied into the existing trail .
- Trail markers would be used to reduce social trails.
- The total length of trail to Spooky slot canyon would be approximately 1.3 miles.
- The identified route would take advantage of sandstone outcrops providing a durable surface to avoid existing biological soil crusts where possible.

Parking Area

- New surface disturbance would include approximately one acre for a parking area. The parking area would accommodate up to 30 vehicles.
- Road base would be used to harden the parking surface.
- A barrier, constructed of natural materials, would be built to prevent further expansion.

Road Access and Signage

- Access to this trailhead would continue from Road #252.
- Engineer and implement road improvements on BLM Road #252. This would include a crown and ditch roadway with road-base as surfacing material. The roadway would be approximately 1 mile in length equaling one acre.
- Provide directional signs along Hole in the Rock Road (#200) and along Road #252.

Vault Toilet

- Install a double vault toilet.
- The vault toilet would be a CXT or similar style and would incorporate Guidelines for a Quality Built Environment.

Guidelines for Quality Built Environment

- 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).

2.3.2 Trailhead B - Development Adjacent to Hole-in-the-Rock Road (#200)

Dry Fork Slot Canyon Trailhead access would be southwest of Hole-in-the-Rock (Road #200) about one mile south of Cat Pasture (See Appendix C – Map). This route, prior to 1991, was the traditional entrance to the Dry Fork area with school trips led by the late Edson Alvey. Visitors would hike through the Dry Fork Narrows to access Peek-A-Boo and Spooky slot canyons. Route development and maintenance for a new hiking route would provide a bypass route on the southwest side of the Dry Fork Narrows.

Design features of the proposal would include:

Trailhead

- Install visitor education and interpretation kiosk and a standard brown metal register box.

Parking Area

- New surface disturbance for the parking area and road would occur on approximately one acre. Parking would accommodate up to 30 vehicles.
- Road base would be used to harden the parking surface.
- Trailhead signs would be placed along Hole-in-the-Rock Road (#200).
- The parking area would be delineated and screened by natural topography.

Road Access

- Access to the trailhead would be developed adjacent to Hole-in-the-Rock Road #200.
- The entrance roadway would be up to 600 feet long and would provide ingress and egress access from the Hole-in-the-Rock Road to the parking area.
- The roadway would be graded to a width to provide access and stability.
- Road base would be used to harden and stabilize the road surface.

Vault Toilet

- Install a single or double vault toilet based on projected use.
- The vault toilet would be a CXT or similar style and would incorporate Guidelines for a Quality Built Environment.

Guidelines for Quality Built Environment

- 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).

Trail

- A 3 mile trail would be developed and delineated with trail markers from the trailhead to lower Peek-A-Boo slot canyon.
- The primary trail (1.28 miles) would utilize the historical use down the Dry Fork Slot Canyon (dry wash) as the primary access route.
- A second trail (1.38 miles) would be built to provide access out of/along the Dry Fork slot canyon to avoid flash floods.
- The identified routes would take advantage of sandstone outcrops to avoid existing biological soil crusts where possible.
- A hiker's maze would be installed for access through the barbed wire fence located approximately 0.5 miles from the proposed trailhead northeast of the road.

2.3.3 Current Trailhead Rehabilitation

Existing disturbance at the current Dry Fork Slot Canyon Trailhead would be re-vegetated and naturalized to the non-impairment standard within the Scorpion WSA and according to the GSENM MMP and BLM Manual 6330.

Rehabilitation/Revegetation Strategy

- All rehabilitation would be to the non-impairment standard outline in BLM Manual 6330.
- Native vegetation would be used for rehabilitation needs.
- Rehabilitation would include;
 - the parking area, approximately 0.4 acres of existing surface disturbance
 - Approximately 0.7 miles of road #252.
 - Approximately 0.25 acres of social trails.
- The disturbed trailhead area and roadway within the WSA would be ripped, raked and/or disked to a natural contour.

- Seeding would be repeated as necessary to ensure adequate vegetative cover is established.

2.3.4 Equipment and Monitoring for Alternative B

Equipment Required

Equipment required for this proposed action include but are not limited to: backhoe/front end loader, road grader with rippers, dump trucks, pickup trucks, flat bed transports trailers and trucks, bob cats, disks, seed harrows, and excavator.

Monitoring

A BLM representative would monitor implementation, rehabilitation and revegetation. Annual monitoring would be conducted for a minimum of five years to evaluate:

- Native plant establishment,
- Potential spread of non-native invasive plants,
- Hydrologic conditions,
- Trail management and maintenance,
- Determine the need for adaptive management.

2.4 Summary Comparison of Environmental Impacts

The proposed action and a no action alternatives have been developed in this EA in an effort to analyze options for trailhead locations. The proposed action alternative would move the current trailhead out of the Scorpion WSA and provide visitors with recreational opportunities. Route development and maintenance would be provided on the north and south side of the Dry Fork Narrows to protect Monument resources, provide for visitor safety, and guide recreationists on established routes.

The proposed action supports FLPMA's mandates to meet the non-impairment standard and objectives outlined in BLM Manual 6330 - *Management of BLM Wilderness Study Areas*.

3.0 AFFECTED ENVIRONMENT

3.1 Introduction

The affected environment was considered and analyzed by an interdisciplinary team as documented in the Interdisciplinary Team Checklist (See Appendix A). 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. The Interdisciplinary Team, as potentially affected by the proposed action alternative identified Recreation, Wilderness Study Areas, Lands with Wilderness Characteristics, and Visual Resource Management.

Issue 1: Recreation

Will the proposed actions affect recreational opportunities and/or the visitor experience?

Issue 2: Wilderness Study Area (WSA)

Will the proposed actions be consistent with relevant law to preserve the Scorpion WSA?
Will the proposed actions impair the suitability to preserve the Scorpion WSA for potential designation for Wilderness?

Issue 3: Lands with Wilderness Characteristics

Will the proposed actions be consistent with relevant laws, policies and guidance for Lands with Wilderness Characteristics?

Issue 4: Visual Resources

Will the proposed site developments create visually contrasting impacts that alter the landscape character?

Will the proposed site developments meet the VRM objectives for that area?

3.2 General Setting

A brief environmental setting description of the Dry Fork area is as follows:

- **Physiographic Province:** Colorado Plateau
- **Elevation:** 4600 to 4900 feet above sea level
- **Geology:** Early Jurassic Navajo formations; predominantly medium sandstone
- **Ecological Site:** Desert Sandy Loam, Desert Shallow Sandy Loam, Desert Sand, Rock Outcrops
- **Hydrology:** Located in the Escalante Watershed (HUC8 No. 14070005). Drainages in the Dry Fork area are typically intermittent and flow into the Escalante River, which then empties into Lake Powell and the Colorado River system
- **Soil Type:** Sand and Sandy Loams
- **Landform:** Dunes, sand sheets, and hillslopes on structural benches, and fan remnants
- **Typical uses:** Recreational (hiking, camping)
- **Management Zone:** Primitive Zone and Passage Zone
- **Special Recreation Management Area:** Escalante Canyons
- **Wilderness Study Areas:** Scorpion WSA, Adjacent to Fifty Mile Mountain WSA
- **Visual Resource Management:** Classes II

3.3 Resources/Issues Brought Forward for Analysis

Resource A: Recreation

The Dry Fork Slot Canyon Trailhead within the Scorpion WSA is the current access point to the Dry Fork Slot Canyon Narrows: Peek-a-boo, Spooky, and Brimstone slot canyons. In 2015, the BLM reported 27,647 visits to the Dry Fork Slot Canyon area making it the most popular slot canyons and the second highest visited destination on the Monument after the Calf Creek Recreation Site. (Recreation Management Information System (RMIS), 2016).

From 2000 to 2015, visitation at Dry Fork Slot Canyon Trailhead increased from 7,918 to 27,647 an increase of 249% in 15 years. Monitoring reports identified multiple social trails, leading from the trailhead down to the lower bench where the trail leads into Dry Fork Wash. User created social trails has caused unnecessary resource impacts along the trail.

The current trailhead was user created and has minimum developments. A trailhead register was located at the site in 1991 with later developments that included an interpretive trailhead panel identifying group size limits, area restrictions and safety practices. The parking area currently supports approximately 30+ vehicles depending on how vehicles park. There are no boundaries around the parking area allowing it to expand particularly over busy weekends. No additional facilities are present.

BLM road #252 is approximately 1.6 miles in length and is not regularly maintained. The road is prone to flooding, erosion, and washouts. When storms waters create impassable sections vehicles tend to drive around the impassable locations, widening the road and causing additional resource impacts. GSENM has identified BLM road #252 in the transportation system, however the road conflicts with the management of WSAs.

BLM utilizes the Recreation Management Information System (RMIS) for reporting and storing visitation records on public lands. Reports provides annual visitation for 72 trailheads, roads and recreation facilities within the Monument. BLM uses traffic counters for vehicles and foot traffic in many locations to determine the amount of visitation for daily, monthly and annual reports. This data provides information to determine the amount of use and resource impacts associated with the Dry Fork Slot canyons. In addition, GSENM employs an in-house Backcountry Database system allowing BLM staff to file patrol reports that document recreational facilities, roads, and trailhead and trail conditions. For this analysis RMIS, vehicle traffic counters and the GSENM in-house Backcountry Database are used to document direct findings on the ground, assumptions, and direct and indirect impacts.

A review of GSENM Backcountry Database reports from 2006 to 2015 identifies numerous resource issues at Dry Fork. The backcountry reports identifies:

- Name of patrolling staff
- Location
- Road conditions
- WSA monitoring
- Number of visitors contacted

- Number of vehicles,
- Work completed and work to be completed on future patrols,
- Resource issues identified.

The Dry Fork backcountry report documented the following information. People contacted ranged from zero to 400 people per day and vehicles documented range from zero to 120 per day. The high number of people and vehicles consistently occur during holiday weekends. Multiple reports identify vehicles parked from Hole-in-the-Rock road to the trailhead.

GSENM's Backcountry Database reports consistently identify the following resource issues:

- Improper disposal of human waste
- Off road driving requiring reclaiming thousands of feet of impacts
- Multiple social trails and vehicle routes
- Parking area expansion
- Hundreds of pounds of trash collected
- Removal of fire rings in the parking area
- Oversized groups greater than 12 people

BLM has employed multiple techniques to reduce resource impacts, which include road signage, road maintenance, reclaiming vehicle and hiker impacts. The BLM staffs, on location, to educate the public and to mitigate resource impacts. An April 2011 report states "parking area simply not large enough to accommodate popularity."

In 2013 the Utah Office of Tourism launched a \$3.1 million spring/summer regional advertising campaign to promote Utah's five national parks known as The Mighty Five™ (<http://business.utah.gov/news/utah-launches-mighty-five-springsummer-advertising-campaign/>).

GSENM is located between the five National Parks spotlighted in the Mighty Five campaign. Increased visitation has been documented since 2013, and may be concluded that the Mighty Five marketing campaign has increased visitation to the Monument due to the geographical proximity to the National Parks in southern Utah.

Considering GSENM RMIS data, the Backcountry Database reports, and the Utah Office of Tourism campaign to promote travel and tourism to this region; it is expected that visitation to Dry Fork would increase.

Resource B: Wilderness Study Area (WSA)

The analysis area for WSA's is the boundary to the Scorpion WSA, it contains 35,884 acres, was established in 1984 under FLPMA section 603. The WSA was inventoried in 1996 and identified in the Utah Wilderness Inventory in 1999.

Currently the Dry Fork Slot Canyons Trailhead and approximately 0.7 miles of road are located within the Scorpion WSA. The parking area at the current trailhead is approximately 0.5 acres in size and accommodates about 30 vehicles. The parking area is currently the closest access point to the Dry Fork Slot canyons. On standard weekends BLM has documented upwards of 45 cars parked in and near the current parking area and along road #252 towards Hole-in-the-Rock road.

Observations during the 2017 Memorial Day weekend recorded between 75-100 cars.

The road to the current trailhead was user created and has existed since the early 1990's. The road is identified on GSENM's TMS and is within the Primitive and Passage Zone identified within the MMP. The current road conditions on BLM #252 are poor; the road is braided in several areas, has heavy erosional impacts and is not maintained.

Historical access to Spooky and Peekaboo slot canyons began at the Cat Pasture area, down Dry Fork wash, and through the Dry Fork slot canyon. Today this canyon receives far less use as the current parking area is a shorter hike to Spooky and Peekaboo slot canyons.

Resource C: Lands with Wilderness Characteristics

The analysis area for Lands with Wilderness Characteristics incorporates two LWC Units, Unit 4 and Unit 8. Unit 4 is approximately 706 acres; Unit 8 is approximately 10,800 acres. Both Units were inventoried in 1996 and identified in the Utah Wilderness Inventory in 1999.

Proposed trailhead A is located within LWC Unit 4 adjacent to the Scorpion WSA. Proposed trailhead B is located within LWC Unit 8 adjacent to the Fifty Mile Mountain WSA.

Unit 4 is contiguous to the Scorpion WSA (UT-040-082). Currently two roads are within Unit 4: BLM road #253 (0.3 miles) and BLM road #252 (1.6 miles). The two roads make up approximately 1.9 miles in length within Unit 4. The current road conditions on BLM road #252 is poor. The road is braided in several areas, has heavy erosional impacts and is difficult to maintain. The BLM road #252 has been in use since the early 1990's and is assumed that it existed prior to that time.

Unit 8 is contiguous to the Fifty Mile Mountain WSA (UT-040-080). Portions of this Unit lack wilderness character due to substantially noticeable impacts. A well-used vehicle route, generally trending north/south, west of the Hole-in-the-Rock road, is a substantially noticeable impact. There is considerable evidence of mineral exploration work on the Fifty Mile Bench above Batty Caves. An earthen stock pond and associated access in the northern portion of the Unit were also considered substantially noticeable.

Portions of Unit 8 that retain their natural character are generally west of the well-used vehicle route described above. These natural areas include Black Ridge, the Washboard and the western part of Sunset Flat. One earthen stock pond (Cat Flat Dam) has no access route. While noticeable to on-site visitors, it is substantially unnoticeable in the area as a whole. Range developments and faint vehicle ways exist within this area, but are substantially unnoticeable.

Resource D: Visual Resources

Characteristic Landscape

The area of analysis for Visual Resources is the viewshed along Hole in the Rock Road. The developments in the proposed action would both be accessed via Hole in the Rock Road to provide hiking access to Dry Fork Canyon. For both, the Straight Cliffs rise dramatically to the west and the Escalante Canyons extensively stretch to the east. The development adjacent to Road #252 would be located on the edge of a mostly flat area that rises slightly to the east (See

Figure 1 in Chapter 4). The development adjacent to Hole in the Rock Road would be located on the upper flanks of a natural depression created by a drainage in the gently rolling topography (See Figure 2 in Chapter 4). The dominant vegetation at both locations is black brush and other desert shrubs and grasses, with a few random pinyon/juniper in isolated locations. The vegetation is mostly dark greenish gray and ranges from fine to medium in texture. There are few built elements in this landscape – roads, fencing, and signs. Of these, the roads are the only element dominant enough to attract attention from a distance.

The development, at Trailhead A, adjacent to Road #252 would be in a broadly enclosed landscape whereas the development at Trailhead B, adjacent to Hole in the Rock Road (#200) would be in a more narrowly enclosed one. The predominant lines are horizontal and rounded created by landform edges. The roads add distinct bands across the landscape that are created by the removal of vegetation which creates a contrast in color and texture to the existing scene and that directs the eye along their alignments. The predominant colors of this landscape are reds and grayish greens due to the landforms and vegetation. The texture of the landscape varies from fine due to the consistent swaths of shrubs and flat topography, to coarse due to the sandstone outcrops, washes, and cliffs.

These developments are proposed in a classic Southern Utah, canyon country landscape with exposed reddish sandstone, sand dunes, and desert vegetation similar to other areas within the Colorado Plateau.

This area is used primarily by recreationists and cattle permittees. Those using the area for recreation are typically engaged in hiking and backpacking, scenic and heritage touring, OHV activities, and photography. This range of individuals defines the casual observer. The season of use when the most people are present is spring through fall.

Visual Resource Management Classes and Objectives

The proposed Dry Fork Trailhead Relocation project areas are 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.

4.0 ENVIRONMENTAL IMPACTS

4.1 Introduction

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

4.1.1 Alternative A – No Action

Resource A: Recreation

The analysis area for Recreation is 1,887 acres in size (see Appendix C – Map) and includes two proposed trailhead sites, each approximately one acre in size. The analysis area is located

between Cat Pasture, Hole-in-the-Rock road (#200), road Dry Fork Trailhead road (#252) and one half mile east of the Dry Fork Wash.

Under the No Action Alternative, the BLM would not relocate or further develop the Dry Fork Slot Canyon Trailhead currently inside the Scorpion WSA. The current trailhead would remain at this location. A second trailhead would not be built and toilets would not be installed to address the human waste concerns. The parking area would continue to expand and be inadequate for the current amount of visitation. The road conditions would be intermittently addressed as needed and conditions will continue to deteriorate causing safety problems.

Direct impacts to the recreational experience includes the evidence of human waste around the trailhead and along the trail. Inadequate parking, social trails that lead to lost hikers, and a road that is not maintainable

Indirect impact include visitation to the slot canyons is expected to increase. Expansion of the current parking lot will continue. The continued addition of human waste in the surrounding area of the trailhead would increase health issues concerning water quality in the watershed.

Resource B: Wilderness Study Area

The analysis area for WSA's is the boundary to the Scorpion WSA; it contains 35,884 acres and was established in 1984 under FLPMA section 603. The WSA was inventoried in 1996 and identified in the Utah Wilderness Inventory in 1999.

The no action alternative would impair the Scorpion WSA and would not conform to the non-impairment standard as identified in BLM Manual 6330.

The direct impact of the no action alternative is the non-impairment standards are not being met with a permanent trailhead and a road within the Scorpion WSA.

The indirect impacts due to maintaining a road and trailhead within the Scorpion WSA would affect wilderness designation. If congress decides to designate Scorpion WSA as wilderness in the future, the location of the current trailhead may be excluded or the entire WSA could be released from further consideration of wilderness designation.

Resource C: Lands with Wilderness Characteristics

The analysis area for Lands with Wilderness Characteristics incorporates two LWC Units, Unit 4 and Unit 8. Unit 4 would be affected by the no action alternative whereas Unit 8 would not be, as a new trailhead would not be developed. Unit 4 is approximately 706 acres and was inventoried in 1996 and identified in the Utah Wilderness Inventory in 1999.

Under the no action alternative, BLM road #252 would split Unit 4. The road would be considered a wilderness inventory road when considering the use of the road, and it is identified on the travel management system. Since the BLM would take no action, the road would remain in use. In this alternative Unit 4 may still be incorporated into the Scorpion WSA as a contiguous unit under consideration.

Direct impacts to Unit 4 are the continued use of BLM road #252. Erosional issues will continue to be a problem with maintaining the road.

Indirect impacts to Unit 4, the BLM road #252 would be the expected increase of visitor use of the road potentially increasing road width and contributing to erosional issues.

Resource D: Visual Resources

The area of analysis for Visual Resources is the viewshed along Hole in the Rock Road. The developments in the proposed action would both be accessed via Hole in the Rock Road to provide hiking access to Dry Fork Canyon. For both, the Straight Cliffs rise dramatically to the west and the Escalante Canyons extensively stretch to the east.

Under the No Action alternative, the site improvements would not be constructed in either location and parked vehicles at the junction of Roads #252 and #253 would continue to occur. The braiding and widening of the access roads would likely continue with more exposed soil visible. In this alternative visual contrast would be created by the temporary but regular presence of parked vehicles as well as the exposed soil from driving and parking areas expanded. This level of contrast would not alter the characteristic landscape to the degree that VRM objectives would not be met.

4.1.2 Alternative B – Dry Fork Slot Canyon Trailhead Development Located Outside the Scorpion WSA

Resource A: Recreation

The analysis area for Recreation is 1,887 acres in size (see Appendix C – Map) and includes two proposed trailhead sites, each approximately one acre in size. The analysis area is located between Cat Pasture, Hole-in-the-Rock road (#200), road Dry Fork Trailhead road (#252) and one half mile east of the Dry Fork Wash.

BLM utilizes the Recreation Management Information System (RMIS) for reporting and storing visitation records on public lands. For this analysis RMIS, GSENM's Backcountry Database reports, and vehicle traffic counters are used to document findings on the ground, analytical assumptions, and direct and indirect impacts.

Trailhead A:

Under the proposed action alternative B, resource issues and visitation, as described above, are expected to increase with frequency. At Trailhead A, a 30 vehicle parking area would be built in a new location allowing for more efficient and controlled parking. Barriers would be installed to minimize resource impacts and off road incursion. Facilities such as, toilets would be installed to address the problem of improper human waste disposal. Road conditions to the current trailhead would improve visitor access and reduce maintenance required on the road. A new foot trail (0.9 miles) from the new trailhead to the existing Dry Fork foot trail (0.4 miles) would be built to provide access and reduce trail braiding (social trails) along the trail.

Trailhead B:

At Trailhead B, a trailhead would be developed to access Dry Fork Wash and Slot Canyon 1.7 miles south of Cat Pasture. The Dry Fork trailhead would be developed for 30 vehicles with parking barriers to reduce off road incursions. A short ingress/egress road (up to 600') would be

built off Hole-in-the-Rock road to the trailhead. A toilet, interpretive panel, and trailhead register box would be installed for public safety and information.

A foot trail (0.5 miles) would be built providing access to Dry Fork Wash. A loop trail (1.38 miles) would be developed and provide two connecting trails for public access and safety. One route would go directly down the Dry Fork Slot/wash. This route is a natural hiking corridor. This slot intersects directly with the current trail accessing Spooky and Peek-A-Boo slot canyons. The new trail would use the existing trail to climb out of the Dry Fork drainage onto a bench and then would traverse the bench back trailhead B.

Trailhead B would provide an alternative access point providing an underutilized hiking route and an alternative to Spooky and Peekaboo slot canyons. Spooky and Peekaboo slot canyons, due to their narrow width in several sections cannot accommodate all visitors. This hike provides an alternative to the traditional slot canyons, disperses visitor use, provides a new experience for returning visitors and would reduce visitor conflicts in the heavily visited Spooky and Peekaboo slot canyons.

Direct impacts from the proposed action alternative includes the construction of and maintenance of two new trailheads. Three miles of new trail to connect to the current trail would need to be built.

Indirect impacts from the proposed action include better capabilities to accommodate recreational needs. Parking, decrease in braided trail system, and better management of human waste. Maintenance of the road will be due to the design of the road itself. Multiple vehicle routes would decrease, as the new road would be capped with road base minimizing poor access issues.

Road length would be reduced by 0.7 miles, the road would be reclaimed and the remainder of the road would be improved and capped with road base allowing passenger vehicles to access the new trailhead.

Resource B: Wilderness Study Area

The analysis area for WSA's is the boundary to the Scorpion WSA, it contains 35,884 acres, was established in 1984 under FLPMA section 603. The WSA was inventoried in 1996 and identified in the Utah Wilderness Inventory in 1999.

Under the proposed action alternative, Scorpion WSA would continue to see increased visitation based on current trends. A trailhead outside of the WSA would be built to accommodate vehicles, toilet amenities, and provide interpretation and public safety messaging. Hiking trails would be built within the WSA to protect and preserve wilderness characteristics and values. The establishment of the proposed trails would reduce social trails, minimizing resource impacts and erosion. The action alternative would rehabilitate existing impacts and minimize future impairments to Scorpion WSA and would bring BLM into conformance with the non-impairment standard as identified in BLM Manual 6330.

Direct impacts from the proposed action of removing a trailhead and a road from within the Scorpion WSA and rehabilitating the current trailhead and road brings the management of this

site into compliance with section 201 of FLPMA as well as BLM Manual 6330 - *Management of BLM Wilderness Study Areas*.

Indirect impacts of the proposed action would support congresses ability to review the Scorpion WSA for future wilderness designation. If congress designates Scorpion WSA as wilderness in the future, the placement of a new trailhead outside of WSA and rehabilitation of the old trailhead would not negate congresses decision to include this portion of the WSA as wilderness.

Resource C: Lands with Wilderness Characteristics

The analysis area for Lands with Wilderness Characteristics includes two LWC Units: Unit 4 and Unit 8. Unit 4 is approximately 706 acres. Unit 8 is approximately 10,800 acres. Both Units were inventoried in 1996 and identified in the Utah Wilderness Inventory (1999). BLM has reviewed both LWC unit inventories for this analysis.

Utah's Wilderness Inventory (1999) identified Unit 4 adjacent to the Scorpion WSA as having wilderness characteristics. There is approximately 0.5 miles of the BLM road (#252) within Unit 4 that would be reclaimed. Under the proposed action alternative, one mile of road #252 would remain in Unit 4 as the primary access point for the Dry Fork Slot Canyons. The partial rehabilitation of road #252, 0.5 miles, would rehabilitate approximately 2.2 acres of Unit 4. The rehabilitation of road #252 would eliminate the need for a wilderness inventory road and would not split Unit 4 into two parts. One mile of road #252 identified in the TMS would remain open and maintained for ingress and egress to the new trailhead. Impacts to Wilderness Characteristic would be reduced in Unit 4 by 0.5 miles or 2.2 acres.

Unit 8 is adjacent to the Fifty Mile Mountain WSA. Under the proposed action, Trailhead B would develop a new road and parking area of approximately one acre. The trailhead would develop approximately one acre leaving 10,799 acres remaining in unit 8.

Direct impacts of the proposed action to Unit 4 wilderness characteristics would be the re-development of the BLM road #252 and a new trailhead. The improvements on road #252 along with the development of the trailhead are expected to reduce off road incursions and impacts to the immediate area.

Indirect impacts of the proposed action may lead to excluding Unit 4 from future management as a unit with LWC. Development of the road and trailhead would be a continuation of the documented long-term use; however, Unit 4 would still hold wilderness characteristics in the remainder of the Unit. Under the proposed action alternative, GSENM would continue to manage the rest of Unit 4 for wilderness characteristics until it is determined to be suitable or not suitable.

Direct impacts to Unit 8 would be a reduction in unit size by approximately one acre, from 10,800 to 10,799 acres. The remainder of the Unit will remain intact. The reduction of one acre would not affect Unit 8 being managed for wilderness characteristics.

Indirect impacts may include increased land use immediate to the parking area in Unit 8. Increase hiking use may affect the area around the new parking area.

Resource D: Visual Resources

The area of analysis for Visual Resources is the viewshed along Hole in the Rock Road. The developments in the proposed action would both be accessed via Hole in the Rock Road to provide hiking access to Dry Fork Canyon. For both, the Straight Cliffs rise dramatically to the west and the Escalante Canyons extensively stretch to the east.

Visual Resource Management has 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, two linear key observations points (KOPs), both along Hole in the Rock Road traveling in both directions, were established as part of completing the contrast rating worksheets.

Linear KOP #1 is along Hole in the Rock Road going in both directions looking toward the development adjacent to Road #252. Linear KOP#2 is also along Hole in the Rock Road going in both directions looking toward the development adjacent to Hole in the Rock Road. The posted travel speed along this road is 35 MPH, which allows someone to visually fixate on something more so than when travelling at higher rates of speed.

Travelling south along KOP #1, the development adjacent to Road #252 would become visible when about $\frac{3}{4}$ mile across from it and be intermittently visible for less than 45 seconds. Travelling north (See Figure 1 below), the development would first become visible about 1.5 miles away and be intermittently visible for less than two minutes. Intermittent visibility would be due to the grade of the road, which is often times below natural grade. The angle of observation along this KOP is primarily a straight on view so most of the ground disturbance would not be obvious. Much of the traffic along Hole in the Rock Road is destined for Dry Fork Slot Canyons; so many casual observers would only view the development when travelling south because it would be at this location that they turn around. However, for those that do travel Hole in the Rock Road from the south, the glint off parked vehicles under certain light condition depending on time of day and year would be visible from miles away.



Figure 1 KOP #1 Along Hole in the Rock

Travelling in either direction along KOP #2, the development adjacent to Hole in the Rock Road would be within 300-600 feet of the edge of the road but would not be visible until within less than 1/3 mile of it due to the rolling topography and it being located in a low spot. The view of the site would be intermittent when travelling south also due to the changing topography (See Figure 2 below). It would be in view for less than one minute travelling in either direction. Both approaches along this KOP provide for a superior angle of observation that results in the ground disturbance for parking being visible. Once adjacent to the development, the angle of observation shifts to straight on or slightly below, reducing the visibility of the site features.

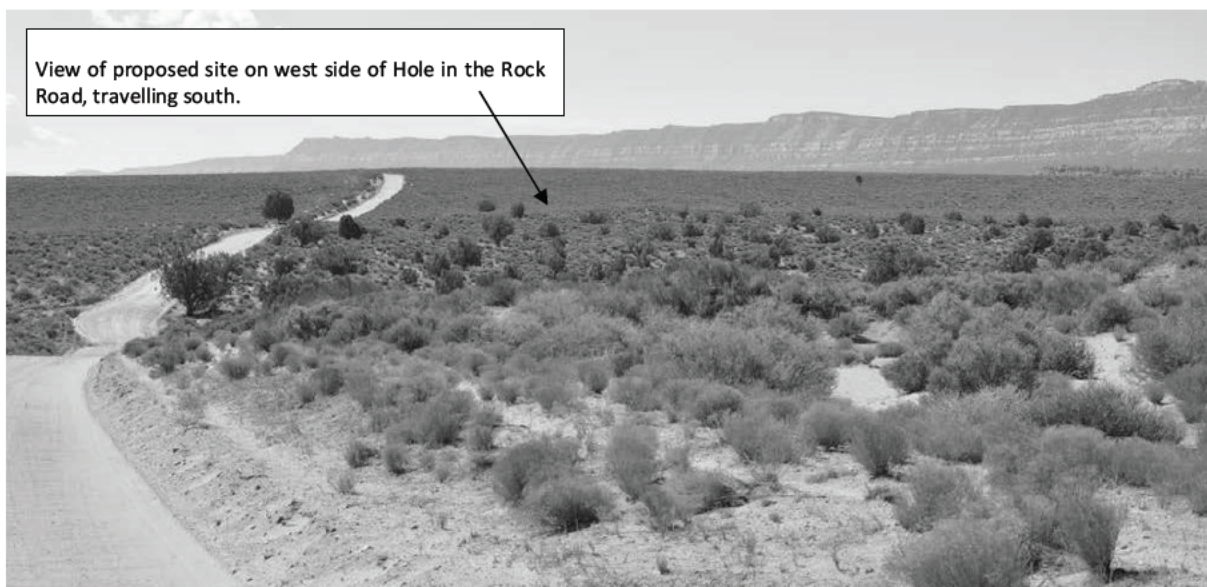


Figure 2 KOP #2 Along Hole in the Rock Road

During construction, temporary visual impacts would result from the visibility of construction equipment and site work. At both locations, weak contrasts would be created, in line and form of structures, due to the construction of the parking areas and the facilities (i.e. toilet, signs, etc.). The structures would add additional edges and elements with vertical, horizontal, and diagonal lines into the landscape. Additionally, the intermittently but persistently parked vehicles would be visible and would create minor visual contrast in color and form. Post-construction, the contrast created by parking areas would be weak, associated with removal of vegetation, which would create additional edges.

In order to minimize the visibility of the site developments for those travelling along Hole in the Rock Road, both were sited to take advantage of landform screening opportunities. The site adjacent to Road #252 would be situated in a location with rounded landforms around three sides, and the site adjacent to Hole in the Rock Road would be situated in a depression. For the site adjacent to Road #252, the jumbled sandstone outcrops in the near periphery as well as the sandstone canyon features that form the horizon provide a textured backdrop, which would allow for some visual absorption of the development. The toilet and other fixtures would be constructed of materials that blend with the natural environment minimizing the color and textural contrast they would create. By constructing the project according to the outlined design criteria and implementation measures, the minor changes to the existing character of the landscape would be appropriate to meet the visual resource management objectives of the area.

4.2 Cumulative Impacts Analysis

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

Resource A: Recreation

Cumulative Impact Area (CIA)

The Cumulative Impact Area (Areas of Analysis) for Recreation is 1,887 acres in size (see Appendix C – Map) and includes two proposed trailhead sites, each approximately one acre in size. The analysis area is located between Cat Pasture, Hole-in-the-Rock road (#200), and the Dry Fork Trailhead road (#252) and one half mile east of the Dry Fork Wash.

Cumulative Impact Analysis

Past, Present, and Reasonably Foreseeable Actions

Past, present and reasonably foreseeable actions for recreation include the increased visitation to the Dry Fork Slots. Increased visitation may be attributed to the designation of the Monument as well as marketing of Utah’s travel and tourism industry.

In 2013 the Utah Office of Tourism launched a \$3.1 million spring/summer regional advertising campaign to promote Utah’s five national parks known as The Mighty Five™ (<http://business.utah.gov/news/utah-launches-mighty-five-springsummer-advertising-campaign/>).

More than 5.2 million visitors spent an estimated \$336.8 million while visiting Zion National Park, Bryce Canyon National Park, Cedar Breaks National Monument and Pipe Springs National Monument, supporting nearly 5,000 jobs and \$152.8 million in labor income, according to the

report. GSENM is geographically in the middle of the Big Five national parks leading to increased visitation to the region.

Other reasonably foreseeable actions include the development and improvement of Hole-in-the-Rock road. Garfield County proposes to improve the road surface within the County. This proposal incorporates 16 miles of the 25-mile drive to Dry Fork. Hole-in-the-Rock road is 62 miles total in length.

Cumulative Impact Analysis

In the No Action alternative, BLM would not develop any recreational infrastructure to meet the increasing demand. Recreation visitation would continue to affect the resource area leading to negative consequences for the visitor experience. Negative experiences may be viewed as poor access and road conditions, no toilets, and unnecessary resource impacts along the road and trailhead.

Continued marketing of travel and tourism in Utah along with increased interest in the Monument would bring increased visitation to the entire region along Hole in the Rock road and the Escalante Canyons. Increased visitation would require GSENM to develop more facilities. Facilities may include trailheads, vault toilets, campgrounds or designated dispersed camp areas. Inclusion of management tools such as a permit allocations system for areas like Dry Fork may also need to be integrated in the future.

Building a trailhead, installing a vault toilet, and developing a new foot trail would reduce impacts with the expected increase in visitation.

Resource B: Wilderness Study Area

Cumulative Impact Area (CIA)

The Cumulative Impact Areas (analysis area) for WSA's is the boundary to the Scorpion WSA, it contains 35,884 acres, was established in 1984 under FLPMA section 603. The WSA was inventoried in 1996 and identified in the Utah Wilderness Inventory in 1999.

Cumulative Impact Analysis

Past, Present, and Reasonably Foreseeable Actions

Past and present actions include the designation of the WSA, grazing activities and increased recreation to the Dry Fork slot canyons and other areas in the WSA. A reasonably foreseeable action would include congresses recommendation to designate the WSA as wilderness or release it from wilderness study areas.

Cumulative Impact Analysis

Under the no action alternative, the recreation analysis area (1,887 acres) could be removed from wilderness designation if the area was impacted or impaired by recreational use. The loss of 1,887 acres would not limit congresses ability to designate the rest of the area as wilderness. The Scorpion WSA includes 35,884 acres; a wilderness area requires a minimum of 5000 acres. The loss of 1,887 acres would allow enough acres for wilderness designation.

Under the proposed action alternative, the rehabilitating of the BLM road #252 and trailhead from the WSA would alleviate impairments within the WSA. The reclamation of impacts would conform to the non-impairment standard outlined in BLM Manual 6330 supporting future consideration of a wilderness designation.

Resource C: Lands with Wilderness Characteristics

Cumulative Impact Area (CIA)

The Cumulative Impact Area (analysis area) for Lands with Wilderness Characteristics includes two LWC Units: Unit 4 and Unit 8. Unit 4 is contiguous to the Scorpion WSA (UT-040-082). Unit 4 is approximately 706 acres. Unit 8 is contiguous to the Fifty Mile Mountain WSA (UT-040-080). Unit 8 is approximately 10,800 acres. Both Units were inventoried in 1996 and identified in the Utah Wilderness Inventory (1999).

Cumulative Impact Analysis

Past, Present, and Reasonably Foreseeable Actions

The cumulative impacts to Lands with Wilderness Characteristics from past, present, and reasonably foreseeable actions include recreational use and facilities (trailheads, toilets, etc.), establishment of livestock management facilities and road construction and maintenance activities.

The proposed action alternative, would not contribute to a measureable increase of impacts to lands with wilderness characteristics units. Unit 4 is not of sufficient size and could only be incorporated as a contiguous unit within Scorpion WSA. Unit 8 is 10,800 acres in size. Trailhead B would remove 0.5 acres from the unit leaving 99% remained to be managed for wilderness characteristics.

Cumulative impacts were not identified for LWC management lands. The proposed action would not contribute to a loss in LWC as the impacts currently exist on the ground.

Resource D: Visual Resources

Cumulative Impact Area (CIA)

Visual Resources - The cumulative impact area of analysis for Visual Resources is the viewshed along Hole in the Rock Road.

The developments in the proposed action would both be accessed via Hole in the Rock Road to provide hiking access to Dry Fork Canyon. For both, the Straight Cliffs rise dramatically to the west and the Escalante Canyons extensively stretch to the east.

Uses and actions began in the cumulative impact area beginning in the mid-1800s and are projected to continue into the future, with recreational use likely to increase based on current trends. The effect of these uses and actions has altered the characteristic landscape to a minor degree, but most casual observers would consider this viewshed along Hole in the Rock to be 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.

Cumulative Impact Analysis

The cumulative impacts to visual resources from past, present, and reasonably foreseeable actions include recreational facilities (trailheads, day use areas, etc.), general recreational use, establishment of livestock grazing management facilities (corrals, fences, water developments, storage buildings, etc.), and road construction and maintenance activities.

The action alternatives would not contribute to a measureable increase in impacts to visual resources as they would be constructed to blend with the landscape, be screened from view to the extent practicable, and the Dry Fork area is already a popular attraction heavily visited by the public throughout the visitation season. Additionally, the Hole in the Rock Road runs 62 miles from north to south through a viewshed that encompasses a landscape of 100,000s of acres. These developments would be primarily visible when in near proximity to them and are small in scale within this grand scale landscape.

5.0 CONSULTATION AND COORDINATION

5.1 Introduction

During preparation of the EA, a scoping letter was mailed out on July 13, 2015 requesting comments from the public. The scoping letter was also published on the BLM NEPA Register site (ePlanning) on August 4, 2015. Eight comments were received. A 30-day public comment period was offered to the public for review of this EA during October 2017

Table 5-1 List of all Persons, Agencies and Organizations Consulted for Purposes of this EA.

Name	Purpose & Authorities for Consultation or Coordination	Findings & Conclusions
Chris Merrit Deputy State Historic Preservation Officer Archaeology	Consultation for undertakings, as required by the National Historic Preservation Act (NHPA) (16 USC 470)	SHPO has approved, by letter dated July 26, 2017, that concurs no eligible cultural resource sites were found within the APE despite complete archaeological survey. The project report determined a finding of No Adverse Effect.

Table 5-2 List of BLM Preparers

Name	Title	Responsible for the Following Section(s) of this Document
Allysia Angus	Land Use Planner	Visual Resources
Jabe Beal	Outdoor Recreation Planner	Recreation, Wilderness Study Areas, and Lands with Wilderness Characteristics
Amber Hughes	Planning and Environmental Coordinator	NEPA compliance

6.0 ACRONYM

6.1 List of Acronyms

BLM - Bureau of Land Management

CIA – Cumulative Impact Area

CXT – CXT Prefabricate Concrete buildings (company name)

DR - Decision Record

EA – Environmental Assessment

EIS - Environmental Impact Statement

FLPMA – Federal Lands Management Policy Act

FONSI – Finding of No Significant Impacts

GSENM - Grand Staircase-Escalante National Monument

HUC – Hydrologic Unit Code

IMP – Interim Management Policy and Guidance for Lands under Wilderness Review

KOP – Key Linear Point

LWC – Lands with Wilderness Characteristics

MMP – Monument Management Plan

NLCS – National Landscape Conservation System

NEPA – National Environmental Policy Act

NPS – National Park Service

OPLMA – Omnibus Public Lands Management Act

RMIS – Recreation Management Information Systems

TMS – Travel Management System

™ - Registered Trade Mark

VRM – Visual Resource Management

WSA – Wilderness Study Area

APPENDIX A
Interdisciplinary Team Checklist

INTERDISCIPLINARY TEAM CHECKLIST

Project Title: Dry Fork Trailhead Relocation
NEPA Log Number: DOI BLM UT 0300 2015 0038 EA
Project Leader: Jabe Beal, Outdoor Recreation Planner

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)	The proposed project of building or maintaining a new parking lot, installing a vault toilet, improving the access road and trail work would result in minimal surface disturbance. Gravel would be put down in parking area and road to minimize dust and particulates. Any particulates generated would quickly disperse and would be non measurable.	/s/ J.Bybee	7/17/2017
NP	Areas of Critical Environmental Concern (Beal/Gale)	No Areas of Critical Environmental Concern are designated within Grand Staircase Escalante National Monument.	/s/ J. Beal	11/29/2016
NI	Biological Soil Crusts (Brinkerhoff)	The proposed project is going to have very minimal surface disturbance therefore not impacting the biological soil crusts. The proposed trails will be designed to avoid the existing biological soil crusts.	/s/ R. Brinkerhoff	1/12/17
NC	BLM Natural Areas (Beal)	This project would not occur within a Natural Area designated within GSENM.	/s/ J. Beal	11/29/2016
NI	Cultural Resources (Zweifel)	A cultural resource survey has been completed for this project. No Historic Properties were found in the project area (see report U 17 BL 0583). This report will be forwarded to SHPO with the quarterly submission under the 2014 "Small Scale Undertakings" PA.	/s/ M. Zweifel	7/7/2014
NI	Greenhouse Gas Emissions (Bybee)	The proposed project would be completed with the use of various types of equipment. The emissions generated would be minimal and non measurable.	/s/ J. Bybee	7/17/2017

Determination	Resource	Rationale for Determination*	Signature	Date
NI	Environmental Justice (Hughes)	As defined in EO12898, minority, low income populations and disadvantaged groups may be present within the County and may use the analysis area. Individual proposed actions within the analysis area would not cause any disproportionately high and adverse effects on minority or low income populations. (Individually or collectively). Members of the public would still use the analysis area.	/s/ A. Hughes	9/14/2017
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	9/14/2017
NI	Fish and Wildlife Excluding USFW Designated Species (Tolbert/McQuivey)	If the proposed action has new ground disturbance and/or vegetation removal the project would need to be worked on outside the migratory bird breeding and brood raising period (April 15 July 15) or a clearance by a qualified biologist completed before ground disturbing or vegetation removal is started.	/s/ T. Tolbert	01/03/2017
NI	Floodplains (Bradshaw)	Parking areas will be constructed outside of floodplains so the proposed action is not likely to cause impacts to floodplains.	/s/ K. Bradshaw	7/19/2017
NI	Fuels/Fire Management (Bate)	The proposed action would not increase or decrease fuels/fire Management within the proposed activity areas.	/s/ A. Bate	12/5/2016
NI	Geology / Mineral Resources/Energy Production (Titus)	Proposed Action would involve installation of relatively long term facilities with extensive surface disturbance. However, there are no particular scenic features that would be adversely impacted. No valid mineral or energy leases or claims would be affected. Production of mineral or energy resources would not be impacted.	/s/ Alan Titus	12/1/2016
NI	Hydrologic Conditions (Bradshaw)	The proposed action would impact hydrologic conditions by compacting small areas where new parking lots are installed and new trails are created but impacts are not expected to be to the degree that detailed analysis is needed.	/s/ K. Bradshaw	7/19/2017
NI	Invasive Species/Noxious Weeds (EO 13112) (Brinkerhoff)	The proposed action will not increase the threat or spread of invasive/noxious weeds. Equipment will be weed washed prior to arriving on site.	/s/ R. Brinkerhoff	1/12/17
NI	Lands/Access (Foley)	Proposed action and alternatives would have no impact to lands and realty values, such as valid existing rights, access, or tenure. Project should take care to preserve survey markers, bearing trees, and witness corners. Please note: The legal description of the existing trailhead according to Lands and Realty data is Township 38 South, Range 6 East, Section 26, N1/2SE1/4. (Updated 6/5/2017) July 2017 update: Evaluation of the updated proposed action remains NI for lands and access issues. The proposed changes would have no impact on land tenure or access. The proposal would also have no impact on realty related valid existing rights, as BLM databases shown none within the project area.	/s/ Mark Foley /s/ Mark Foley	12/5/2016 07/05/2017

Determination	Resource	Rationale for Determination*	Signature	Date
NI	Livestock Grazing (Bybee)	The proposed action would not affect livestock grazing in the proposed locations for the new trailheads. Most of these areas are black brush dominated sites with little to no understory. Livestock generally do not spend a lot of time in these areas. Human and cattle conflicts should be minimal. Both of these proposed locations are far enough away from livestock handling and watering locations that conflicts would not occur.	/s/ J. Bybee	7/24/2017
NI	Native American Religious Concerns (Zweifel)	A cultural resource survey has been completed for this project. No Historic Properties were found in the project area (see report U 17 BL 0583). This project will be included in the annual GSENM/Native American consultations, but no comments are anticipated.	/s/ M. Zweifel	7/7/2014
NI	Paleontology (Titus)	Project would be ground disturbing in middle Jurassic Carmel Formation. However, this unit, which is a fossil sabkha and erg system, has almost no potential for significant fossils based on repeated surveys in the GSENM. I re reviewed the EA on 7/3/2017 and my above statement remains the same.	/s/ Alan Titus	12/1/2016 7/3/2017
NI	Rangeland Health Standards (Stewart)	It is acknowledged that Rangeland Health will be impacted at the point of the proposed project but the relatively small area of the project is deemed insignificant since determinations as to whether or not an area is achieving or not achieving RLH standards is made on a much broader scale such as pasture, allotment or by watershed.	/s/ S. Stewart	12/8/2016
PI	Recreation (Beal/Gale)	Recreation will be addressed in detail within the EA.	/s/ J. Beal	11/26/2016
NI	Socio Economics (Hughes)	Quantifiable additional or decreased economic impact to the local area would not be affected by the proposed action	/s/ A. Hughes	9/14/2017
NI	Soils (Bradshaw)	The proposed action would impact soils by compacting small areas where new parking lots are installed and new trails are created but impacts are not expected to be to the degree that detailed analysis is needed.	/s/ K. Bradshaw	7/19/2017
NP	Threatened, Endangered or Candidate Plant Species (Brinkerhoff)	There are no known threatened, endangered or candidate plant species or their habitats within the proposed project site.	/s/ R. Brinkerhoff	1/12/17
NI	Threatened, Endangered or Candidate Animal Species (Tolbert/McQuivey)	No suitable habitat for threatened, endangered, or candidate species is within the project area. No designated critical habitat for these species is within the project area. There is no documentation of any of these species occurring within the vicinity of the project area.	/s/ T. Tolbert	01/03/2017
NP	Wastes (hazardous or solid) (Pierson)	There will be no industrial wastes or toxic substances used or generated.	/s/ B. Pierson	12/5/16
NI	Water Resources/Quality (drinking/surface/ground) (Bradshaw)	The proposed action is not likely to cause impacts to water resources.	/s/ K. Bradshaw	7/19/2017
NP	Wetlands/Riparian Zones (Brinkerhoff)	The proposed project will not impact any wetland/riparian zones.	/s/ R. Brinkerhoff	1/12/17
NP	Wild and Scenic Rivers (Beal/Gale)	Project will not occur on any WSR suitable segments on GSENM.	/s/ L. Gale	12/15/16

Determination	Resource	Rationale for Determination*	Signature	Date
PI	Wilderness/WSA (Beal/Gale)	Proposed action alternatives include construction of developed facilities which if they occur inside boundary of Scorpion WSA has the potential to impact and even impair wilderness suitability.	/s/ L. Gale	12/15/16
NI	Woodland/Forestry (Bate)	The proposed action would not remove any woodland/forestry plant species.	/s/ A. Bate	12/5/2016
NI	Vegetation Excluding USFWS Designated Species (Brinkerhoff)	The proposed action will not impact the overall health of the existing vegetation. Surface disturbance is minimal causing very little disturbance to vegetation.	/s/ R. Brinkerhoff	1/12/17
PI	Visual Resources (Angus)	Project alternatives are located in both VRM Class I and Class II areas. Contrast ratings are needed to determine impacts and compliance with VRM objectives.	/s/ A. Angus	12/6/2016
NP	Wild Horses and Burros (Stewart)	There are no Wild Horse and Burro Herd Management Areas within GSENM.	/s/S. Stewart	12/8/2016
PI	Lands with Wilderness Characteristics (Beal/Gale)	Draft alternatives to re locate trailhead are proposed to potentially occur in areas previously inventoried in 1999 and found to contain wilderness characteristics or in areas, never inventoried. Per BLM policy, these areas are anticipated to require a new or updated Lwc inventory to determine presence of wilderness characteristics and potential for impacts.	/s/ L. Gale	12/15/16

FINAL REVIEW

Reviewer Title	Signature	Date	Comments
Environmental Coordinator	/s/ Amber L. Hughes	9/14/2017	
Authorized Officer			

APPENDIX B

Alternative A Map – No Action

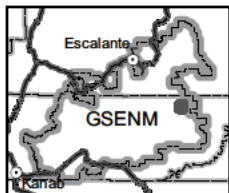
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APPENDIX C

Alternative B Map – Proposed Action

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DOI-BLM-UT-0300-2015-0038-EA-Dry Fork Slot Canyon Trailhead Relocation
 Township 38S, Range 6 E, Section 27 N1/2; Section 36 N1/4
 Salt Lake Meridian
 Alternative A - No Action



WSA

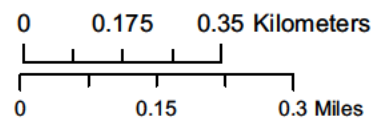
Lands with Wilderness Characteristics

Existing Trailhead

Travel Management

— Open; Open/ATV

- - - Trail



1:12,500

DOI-2020-11 02967

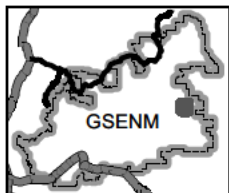
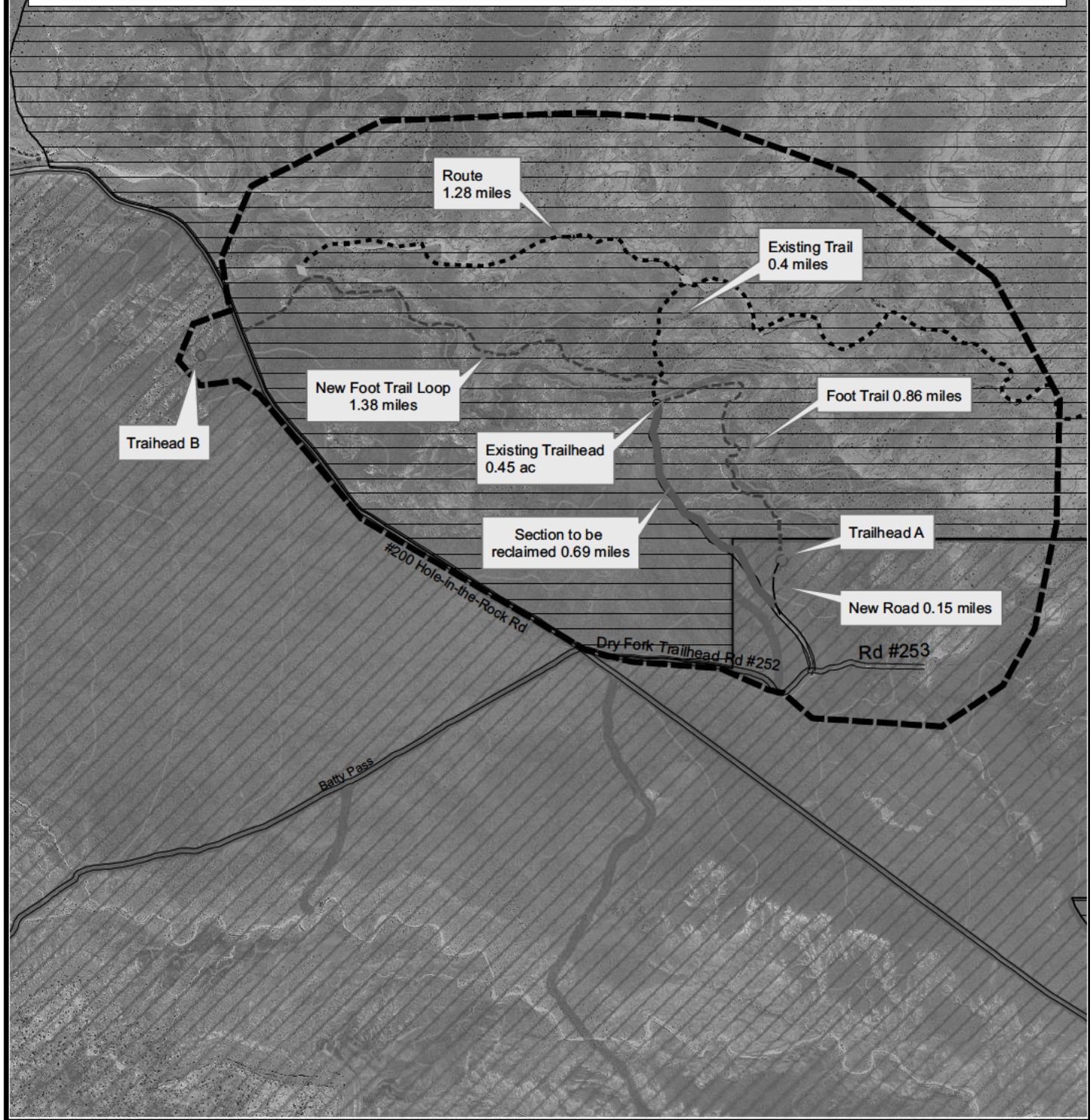
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BLM

Grand Staircase-Escalante National Monument



DOI-BLM-UT-0300-2015-0038-EA-Dry Fork Slot Canyon Trailhead Relocation
 Township 38S, Range 6 E, Section 27 N1/2; Section 36 N1/4
 Salt Lake Meridian
 Alternative B



Alternative Locations

- Alternative B
- Lands with Wilderness Characteristics
- Wilderness Study Area

Analysis Area 1,887 ac

Travel Management

- Open; Open/ATV
- Trail

0 0.175 0.35 0.7 Kilometers
 0 0.275 0.55 Miles



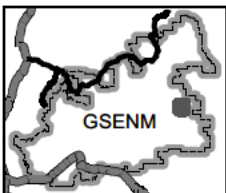
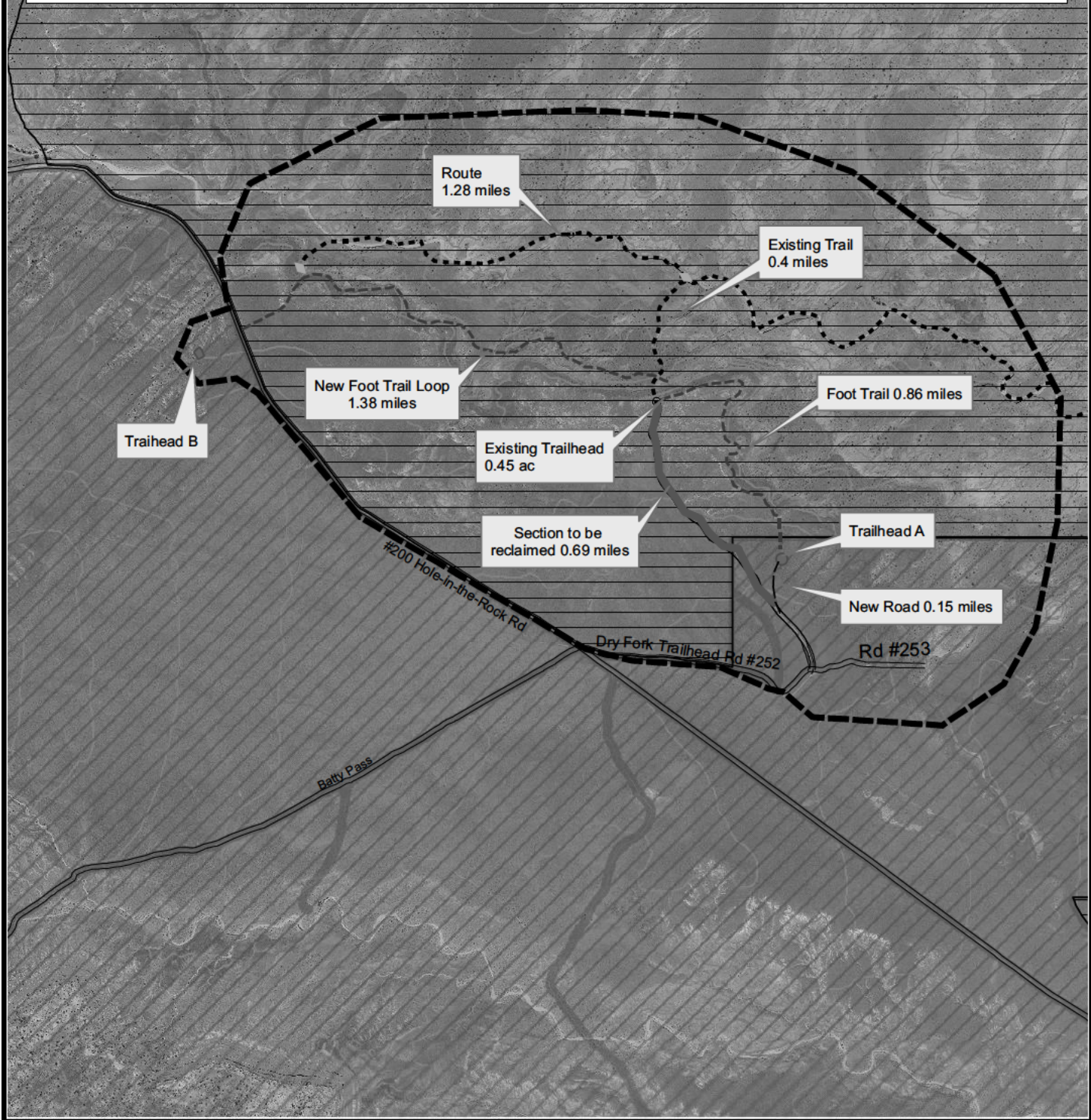
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Grand Staircase-Escalante National Monument

BLM

DOI-BLM-UT-0300-2015-0038-EA-Dry Fork Slot Canyon Trailhead Relocation
 Township 38S, Range 6 E, Section 27 N1/2; Section 36 N1/4
 Salt Lake Meridian
 Alternative B



Alternative Locations

- Alternative B
- Lands with Wilderness Characteristics
- Wilderness Study Area

Analysis Area 1,887 ac

Travel Management

- Open; Open/ATV
- Trail

0 0.175 0.35 0.7 Kilometers
 0 0.275 0.55 Miles



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DOI-2020-11 02969
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Grand Staircase-Escalante National Monument

BLM