

United States
Department of
Agriculture

Forest Service
Intermountain Region

Dixie National Forest

Teasdale Ranger District



*Boulder Top TRMP Allocation
Dodge from 72 to 64*

BOULDER TOP WATERSHED AND FISHERIES RESTORATION PROJECT

DECISION NOTICE

AND

FINDING OF NO SIGNIFICANT IMPACT

August, 1997

000355

**DECISION NOTICE
AND
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**BOULDER TOP WATERSHED AND FISHERIES RESTORATION PROJECT
TEASDALE RANGER DISTRICT
DIXIE NATIONAL FOREST**

INTRODUCTION

The Teasdale Ranger District, Dixie National Forest, has completed an Environmental Assessment (EA) documenting the analysis for management actions proposed within the Boulder Top analysis area. The objectives of the proposal are to: initiate actions that would improve watershed conditions, fisheries and the road system on Boulder Top to reduce on-going resource damage, and to amend the Dixie National Forest Land and Resource Management Plan (LRMP) by changing Management Area 7A - Wood Production and Utilization within the analysis area on Boulder Top to 2A - Semiprimitive Recreation.

The proposed project lies within the Teasdale Ranger District. The project area includes all or portions of the following legal locations: T.30S. and R. 3E, 4E., and 5E.; and T.32S. and R. 3E., 4E., and 5E.; Salt Lake Base Meridian, Wayne and Garfield Counties, Utah.

The Environmental Assessment for the Boulder Top Watershed and Fisheries Restoration Project is a site-specific analysis that discloses the effects of implementing the Proposed Action, the No Action, and four other action alternatives. The analysis is documented in the companion Environmental Assessment, and is supported by the project file located at the Dixie National Forest Supervisor's Office.

This EA was developed under the implementing regulations of the National Environmental Policy Act (NEPA); Council on Environmental Quality; Title 40, Code of Federal Regulations Parts 1500-1508; the National Forest Management Act (NFMA) and Title 36, Code of Federal Regulations, Part 219. Further direction is provided in the Dixie National Forest Land and Resource Management Plan.

DECISION

Based on the analysis documented in Boulder Top Watershed and Fisheries Environmental Assessment, it is my decision to implement a combination of Alternative D and the Proposed Action. The decision incorporates most of Alternative D with the following exceptions in the Proposed Action alternative: (1) FS Road #522 and #1302 to Horseshoe Lake will remain open, and (2) FS Road # 171 to Chokecherry Point will remain open in its entirety. If future monitoring, however, shows excessive use at Horseshoe Lake (ie, garbage, poor sanitary conditions, over-use, etc.) and/or that fishery management objectives for this area are not being met, FS Roads #522 and # 1302 could be closed at a future date using any of the methods described in the EA. Since the effects of closing the road to Horseshoe Lake have been displayed in this EA, no further NEPA analysis would be required to implement the closure.

Reconstruction of FS Road #178 will consist of improving those sections of road that have been identified as being a sediment source or which pose a safety risk to the public. An example would be those places where the road consists of several tracks created by users trying to avoid wet, boggy areas. These

areas would have fill material brought in to raise the bed and create a single track road. Routine road maintenance activities would take place in other areas of FS Road #178 also.

Implementing this action will improve watershed conditions, lake fisheries, and road conditions and will result in more diverse recreational opportunities. Changing management area emphasis from 7A to 2A will better reflect the existing conditions and future opportunities that exist on Boulder Top. Where roads designated as 2B - Roaded Natural Recreation, are being closed, management area designation will change to 2A. This affects approximately 1.5 miles of FS Road #522 to Crater Lake and approximately 1.0 mile of FS Road #2278 in the Ridge Lake area.

During the public involvement period comments were received that favored the Proposed Action, as well as comments that favored No Action. Comments were also received which favored closing all motorized access to Boulder Top as well as comments that suggested a variety of open/closed road options. Monitoring items identified in Appendix 4 of the Environmental Assessment will be implemented as part of this decision.

MITIGATION MEASURES

Mitigation measures that were developed by the Interdisciplinary Team can be found in Chapter 2, pages 6-7 of the Environmental Assessment.

DECISION RATIONALE

The detailed analysis in Chapter 4 of the EA describes how each alternative affects major issues and resources. Based on close and thoughtful review of these effects I have chosen a combination of features in Alternative D and the Proposed Action because it best meets the purpose and need, effectively addresses and corrects most of the problems that are occurring, and will cause no harmful effects to the resource. This decision will result in improved watershed conditions and lake fisheries associated with poorly located roads.

I would like to emphasize the points and considerations that I deliberated on prior to making this decision.

- Presently many of the lakes on Boulder Top are receiving excessive amounts of sediment from unplanned, poorly located, or substandard roads. As the lakes fill with sediment, the water depth and oxygen capacity of the lake decreases. The effect is a gradual decline in the lakes ability to overwinter fish. Eventually, no fish will be able to survive from one year to the next and annual stocking will be necessary to maintain the fishery. As a result, anglers will experience less success, fish will be smaller, and there will likely be lakes that will no longer provide a fishery. This is a serious concern that must be addressed as winter kill appears to be occurring at a greater frequency than in the past.
- During development of the Dixie National Forest Land and Resource Management Plan in 1986, much of Boulder Top was designated as Management Area 7A - Wood Production and Utilization. In 1992, the Forest withdrew its decision to harvest commercial timber in the Noon Lake area of Boulder Top. The proposal was withdrawn because our analysis revealed that tree stands in the area had relatively few silvicultural needs, were not in imminent danger of pest outbreak, and would not

likely be so for another 20 to 30 years. Consequently there was no immediate need identified for timber management.

The Boulder Top is a unique area on the Forest due to its remote character, high elevation, numerous lakes, and dispersed recreation opportunities. For these reasons, the Management Area direction for 2A - Semiprimitive Recreation appears to be a more appropriate designation than 7A. Changing the emphasis from 7A to 2A on 29,554 acres will not preclude future timber harvest opportunities. I do not believe, therefore, that this action will result in a meaningful change to the Forest's allowable sale quantity (ASQ) for the next two to three decades. The Forest is in the process of Forest Plan Revision and ASQ will be recalculated within the next three years. Other resource management activities such as livestock grazing and mineral development are also allowed in 2A areas.

- Several respondents felt that the area should be closed to all motorized access, and others felt that the area should not be changed. I understand these preferences and have considered the effects of these options. They have not, however, been chosen. The users of the National Forest encompasses different people with different abilities. Keeping the area under present management, or creating an area that is completely closed to motorized users, would do little to accommodate those who are differently abled. This decision provides for a well balanced approach at meeting users abilities and requests while meeting the purpose and need for the project.
- The UDWR has expressed concern with keeping the road to Horseshoe Lake (FS Road #522 and #1302) open as they believe it will result in increased fishing pressure to this area. UDWR's fishery objectives are to manage this area as a Trophy trout fishery. The Forest will continue to encourage the UDWR to stock catchable trout in Big, Ridge, Noon, and Dead Horse Lakes as we believe that this will help to alleviate some of the pressure on Horseshoe Lake. However, there is a chance that UDWR may not stock these lakes if the road to Horseshoe remains open. Monitoring recreational use around Horseshoe Lake, as well as the fishery resource in this area, will guide future decisions regarding access to Horseshoe Lake.

The selected alternative is consistent with the National Forest Management Act (NFMA) of 1976 and meets the management requirements detailed in implementing regulations 36 CFR 217.27 (a) through (g). Specifically, management actions for the selected alternative provide for the protection of soil, water, air, wildlife, fisheries, and other multiple uses under 36 CFR 217.7 (a) (1) through (12).

No conflicts have been identified with other Federal, State and Local governmental agencies.

The selected alternative complies with the Endangered Species Act, and will have no effect to heritage resources.

Wetlands and floodplains as described in Executive Orders 11988 and 11990 will not be affected.

The goal of the National Environmental Policy Act is "to achieve a productive and enjoyable harmony between man and his environment; to promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man...". I believe that the selected alternative best meets the goals of harmonious balance for the reasons stated.

PUBLIC INVOLVEMENT

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Analysis of the Proposed Action was initiated through a public scoping process. A scoping notice was mailed to a total of approximately 120 interested individuals, organizations, and state and federal agencies on August 16, 1993. Due to other priorities on the Forest, analysis was prolonged. For this reason, an update letter was sent out to approximately 200 interested individuals, organizations, and state and federal agencies on February 15, 1997. The letter was to inform those interested publics that the analysis was continuing and was expected to be completed in 1997. The Interdisciplinary team analyzed each comment and decided that three issues were applicable.

- 1) Proposed road improvements may increase access and use on Boulder Mountain and may result in increased unauthorized road densities and watershed damage. Conversely, others felt that the proposed road closures may decrease access and use on Boulder Mountain making it more difficult for some segments of society to reach areas that are currently serviced by roads targeted for closure.
- 2) Cattle and sheep grazing and commercial logging are also contributing to the sedimentation and erosion problems. The problems on Boulder Top would only be partially corrected by the proposed project. Some felt that roads are not causing a sedimentation problem and that there was no need to close them.
- 3) The proposed road closures would reduce fishing opportunities for some users. Trailheads would concentrate use in some areas and may create litter and other recreation related impacts. Changing the management area designation would reduce or eliminate future opportunities for timber management and grazing. New trails should be closed to ATV's, motorcycles, and mountain bikes, otherwise the problems will only be partly solved.

On June 3, 1997, notification of the Environmental Assessment for the Boulder Top Watershed and Fisheries Restoration Project was given to all interested parties. A Legal Notice was published in The Spectrum newspaper on June 5, 1997; The Garfield County News on June 5, 1997; and The Richfield Reaper on June 4, 1997. Publication in The Spectrum formally began the 30 Notice and Comment period.

The time and effort that respondents put into this project is valued and greatly appreciated. Public comments and responses to the EA are attached (Appendix 5). I believe the EA considers all the concerns expressed during the comment period, and believe the effects of the selected alternative are appropriately disclosed.

The record of all the public contacts and responses are in the project file located at the Supervisors Office.

ALTERNATIVES CONSIDERED

Six alternatives were evaluated in detail. These alternatives represent a range of management strategies and outputs, and meet Forest Plan and proposal objectives. In responding to the issues, management options were varied to acknowledge the variety of uses and needs. One other alternative was considered but not analyzed in detail (EA, Chapter 2, page 3). The alternatives evaluated in detail are Proposed Action, No Action, and Alternatives A, B, C, and D. Completed descriptions of these alternatives can be found in Chapter 2 of the EA, pages 1-10.

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COMPLIANCE WITH THE FOREST PLAN, OTHER LAWS AND REGULATIONS

The selected alternative complies with the Dixie National Forest Land and Resource Management Plan, the National Forest Management Act of 1976, the Endangered Species Act, the National Environmental Policy Act and all other Federal, State and Local laws. No floodplains or wetlands will be deteriorated as defined in Executive Orders 11988 and 11990.

FINDING OF NO SIGNIFICANT IMPACT

I have determined that this action is not a major federal action, individually or cumulatively and will not significantly effect the quality of the human environment. An Environmental Impact Statement is not needed. This determination is based on the following factors:

Context of the Project

The project will occur at a local level. Decisions made relative to the road closures, reconstruction, trail development, and Forest Plan amendments, will effect users. No significant effects are expected to occur within this project area (EA, Chapter 4).

Intensity of the Project

Intensity refers to severity of impact. The following ten factors were evaluated in determining the intensity of effects of the proposed project:

- 1. Beneficial and adverse effects from the selected alternative are not significant.** The effects described in Chapter 4, support this determination.
- 2. Public health and safety are not adversely affected by the selected alternative.** Public health and safety are improved as poorly located roads are closed and portions of FS Road # 178 is reconstructed.
- 3. There are no areas within the project area or cumulative effects areas with unique geographic characteristics such as historic or cultural resources, parklands, prime farm lands, wild and scenic rivers, or ecologically critical areas that are significantly affected by the selected alternative.** This is documented in Chapter 3 of the EA.
- 4. The effects of the selected alternative on the quality of the human environment are not highly controversial.** These effects are disclosed in Chapter 4 of the EA.
- 5. There are no known effects on the human environment that are highly uncertain or involve unique or unknown risks.** All known effects are adequately discussed in the EA, Chapter 4, and were professionally determined and disclosed.
- 6. These actions do not set a precedent for other projects that may be implemented to meet the goals and objectives of the LRMP.** The prescribed actions are relative to this project area only, and do not set a precedent for these types of actions.

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7. There are no known significant cumulative effects between this project and other projects implemented or planned in this area. This is substantiated in the cumulative effects discussion in Chapter 4 of the EA.

8. There are no known historic or cultural resources or properties that will be affected. This is documented in Chapters 3 and 4 of the EA.

9. There are no known endangered, threatened or sensitive plant or animal species within the project area that will be adversely effected by the selected alternative. Relevant documentation is referenced in Chapters 3 and 4 of the EA, and within the Biological Assessments and Evaluations located in the Project File.

10. The actions do not threaten a violation of Federal, State or Local laws or requirements imposed for the protection of the environment. This conclusion is based on my review of the EA and review of the public input that has been received for this project.

IMPLEMENTATION OF ADMINISTRATIVE REVIEW

This decision is subject to appeal pursuant to Forest Service Regulations at 36 CFR 215.7. Any written appeal must be postmarked or received by the Appeal Deciding Officer, Regional Forester Dale N. Bosworth, Intermountain Region Office, 324 25th Street, Ogden, Utah 84401, by September 22, 1997 which is 45 days following the date that the legal notice was published in The Spectrum newspaper, St. George, Utah. Appeals must meet content requirements of 36 CFR 215.14.

This decision may be implemented no sooner than September 29, 1997.

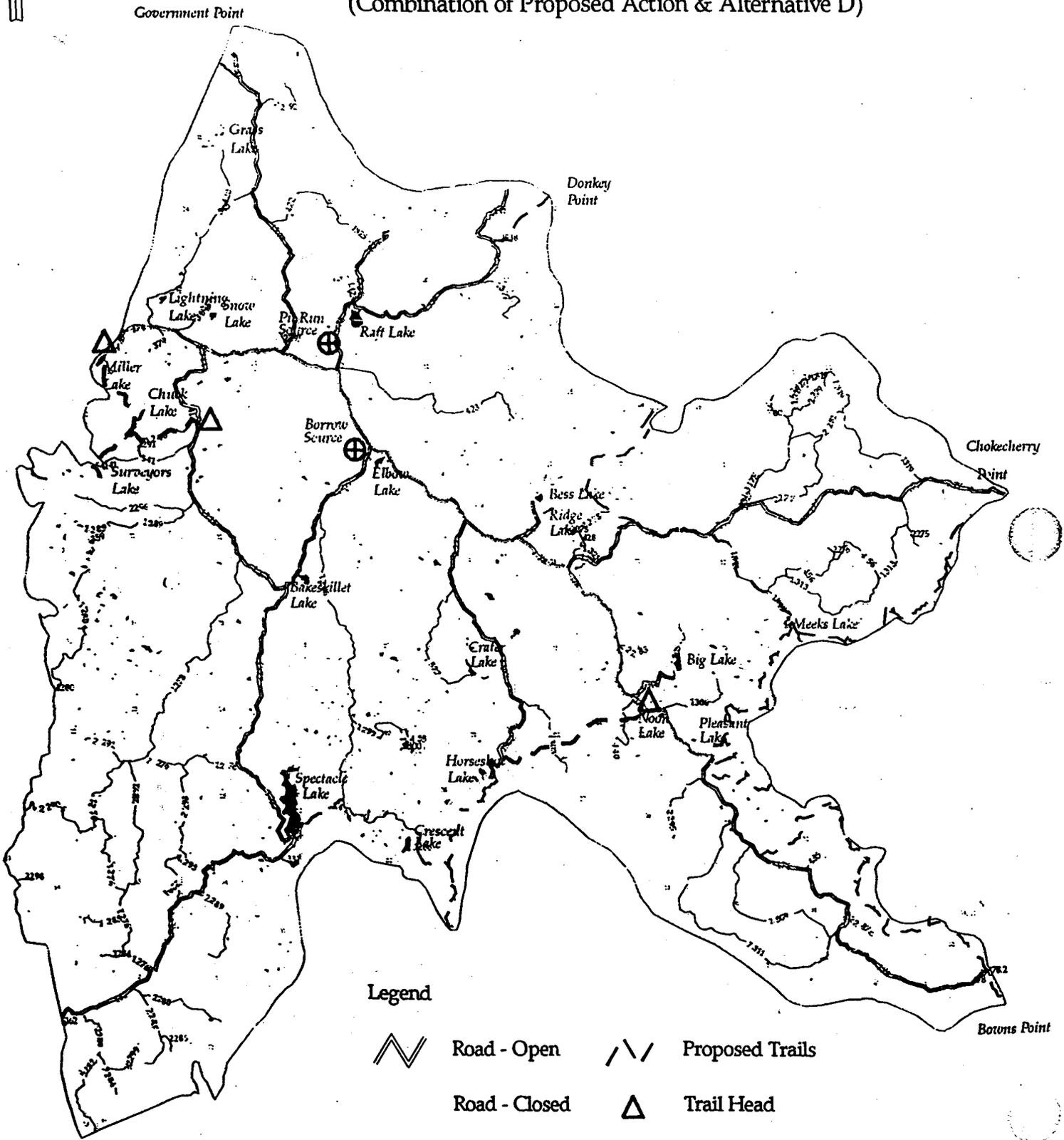
For additional information, contact Steve Robertson at the Supervisors Office, Dixie National Forest, 82 North 100 East, Cedar City, Utah, 84720 (801) 865-3735.


Hugh C. Thompson
Forest Supervisor

8/5/97
Date

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Boulder Top Watershed and Fisheries Improvement Project Transportation System for Selected Alternative (Combination of Proposed Action & Alternative D)



Legend

- | | | | |
|--|----------------|--|----------------------------|
| | Road - Open | | Proposed Trails |
| | Road - Closed | | Trail Head |
| | Reconstruction | | Pit Run and Borrow Sources |
| | Open Trails | | |



South Point

Errata
Corrections
to the
Boulder Top Watershed and Fisheries Restoration Project
Environmental Assessment

Correction 1: Chapter 4, Soil and Watershed, Table 4-3 (page 4-8)

Please change Horseshoe Lake from closed to open in Alternative C and from open to closed in Alternative D.

Correction 2: Chapter 4, Fisheries (pages 4-25 - 4-28)

Please note the changes regarding the effects of the error in the open/closed status of the road to Horseshoe Lake. Corrections are in bold type.

ALTERNATIVE C

Direct/Indirect Effects

Under Alternative C, roads would be closed to the following lakes that contain a fishery: Chucks, Surveyors, Meeks, Dead Horse, Big (partially), Bess, Rim, and Crater. The road around Big Lake will be closed but anglers will still be able to access a portion of the lake by motorized vehicle. The first three lakes are being highly impacted by sediment transported from the roads accessing the lakes. All lakes show evidence of sediment delta fans forming where the roads approach the lakes. In some instances, the roads have active gullies up to 1.5 feet deep going down to the lakes. Over time, these lakes will become more shallow and will be unable to overwinter fish. This will result in smaller sized fish being caught and will not provide for the opportunity to catch larger trout. It's possible that the lakes would no longer be suitable to maintain as a fishery and would no longer be stocked by UDWR. By closing and rehabilitating those sections of road that are contributing sediment to the lakes, the lakes will be able to overwinter fish for a longer period of time. This will provide more angling opportunities for larger sized trout as the fish will be able to grow for several years rather than for just one season.

Alternative C would provide more opportunities for "walk-in" fisheries at the above lakes. These total approximately 65 surface acres. For those seeking this type of angling experience, the quality should improve over the existing conditions. This would primarily be a result of fewer anglers fishing those lakes as they would have to access them by non-motorized means. These anglers would likely experience more solitude and have a better opportunity to catch above average size trout.

In order to mitigate for those fisheries that will no longer have motorized access, the Forest is working with UDWR to change the type of stocking in Ridge, Big, and Noon lakes from fingerling (put-grow-and-take) to catchable size trout. All of these lakes have been stocked in the past or are currently stocked with fingerling brook trout. With fingerlings, however, the fish produced annually are smaller than those which could be produced by stocking catchable trout. Overall, this will provide for more consistent angling opportunities on a year to year basis. The change in management of these lakes from

fingerling put-grow-and-take to catchable-size fisheries affects approximately 17 surface acres. The UDWR management for these waters would change from Basic Yield to Intensive Yield.

In summary, for this alternative, the following lake fisheries would have motorized access: Spectacle, Big, Noon, Raft, Ridge, Crater, Crescent, and Horseshoe Lakes (102 surface acres). The following lake fisheries would be closed to motorized access: Chucks, Surveyors, Cub, Meeks, Pleasant, Rim, Bess, Horseshoe, Ledge, East, Halfmoon, and Circle Lakes (46 surface acres).

Non-motorized access and the type of angling experience provided for under Alternative C is consistent with the proposed Forest Plan amendment to change Management Area 7A - Wood Production and Utilization to 2A - Semiprimitive Recreation.

Implementing Alternative C is in compliance with LRMP Goal # 14 and its objectives which is to improve the quantity and quality of aquatic habitats through direct habitat improvement and increased coordination with other land use programs (LRMP pp IV-5).

ALTERNATIVE D

Direct/Indirect Effects

Under Alternative D, roads would be closed to the following lakes that contain a fishery: Chucks, Surveyors, Meeks, Big (partially), Rim, Crater, Crescent, and Horseshoe. The road around Big Lake will be closed but anglers will still be able to access a portion of the lake by motorized vehicle. The first three lakes are being highly impacted by sediment transported from the roads accessing the lakes. All lakes impacted by roads show evidence of sediment delta fans forming where the roads approach the lakes. In some instances, the roads have active gullies up to 1.5 feet deep going down to the lakes. Over time, these lakes will become more shallow and will be unable to overwinter fish. This will result in smaller sized fish being caught and will not provide for the opportunity to catch larger trout. It's possible that the lakes would no longer be suitable to maintain as a fishery and would no longer be stocked by UDWR. By closing and rehabilitating those sections of road that are contributing sediment to the lakes, the lakes will be able to overwinter fish for a longer period of time. This will provide more angling opportunities for larger sized trout as the fish will be able to grow for several years rather than for just one season.

Alternative D would provide more opportunities for "walk-in" fisheries at the above lakes. These total approximately 52 surface acres. For those seeking this type of angling experience, the quality should improve over the existing conditions. This would primarily be a result of fewer anglers fishing those lakes as they would have to access them by non-motorized means. These anglers would likely experience more solitude and have a better opportunity to catch above average size trout.

In order to mitigate for those fisheries that will no longer have motorized access, the Forest is working with UDWR to change the type of stocking in Ridge, Big, Dead Horse, and Noon lakes from fingerling (put-grow-and-take) to catchable size trout. All of these lakes have been stocked in the past or are currently stocked with fingerling brook trout. With fingerlings, however, the fish produced annually are smaller than those which could be produced by stocking catchable trout. Overall, this will provide for more consistent angling opportunities on a year to year basis. The change in management of these lakes

from fingerling put-grow-and-take to catchable-size fisheries affects approximately 18 surface acres. The UDWR management for these waters would change from Basic Yield to Intensive Yield.

In summary, for this alternative, the following lake fisheries would have motorized access: Spectacle, Big, Noon, Raft, Ridge, Dead Horse, and Bess Lakes (73 surface acres). The following lake fisheries would be closed to motorized access: Chucks, Surveyors, Cub, Meeks, Pleasant, Rim, Crater, Crescent, Ledge, East, Halfmoon, Circle, and Horseshoe Lakes (75 surface acres).

Non-motorized access and the type of angling experience provided for under Alternative D is consistent with the proposed Forest Plan amendment to change Management Area 7A - Wood Production and Utilization to 2A - Semiprimitive Recreation.

Implementing Alternative D is in compliance with LRMP Goal # 14 and its objectives which is to improve the quantity and quality of aquatic habitats through direct habitat improvement and increased coordination with other land use programs (LRMP pp IV-5).

Correction 3: Chapter 2 (page 2-8)

Please note the following correction to motorized/non-motorized acres for Alternatives C and D.

<u>Measurement Indicators</u>	<u>No Action</u>	<u>Proposed Action</u>	<u>Alt. A</u>	<u>Alt. B</u>	<u>Alt C.</u>	<u>Alt D.</u>
Fisheries and Recreation						
Fishable Lakes by Access (Acres)						
Motorized	124	89	89	73	102	73
Non-motorized	17	59	59	75	46	75
Total	141	148	148	148	148	148

Correction 4: Management Area 2B to 2A

As a result of closing a 1.5 mile segment of FS Road # 599 to Crater Lake and approximately 1.0 mile of FS Road # 2278 in the Ridge Lake area, the 2B designation (Roaded Rural Recreation) would be changed to 2A - Semiprimitive Recreation. Both classifications are similar in that resource modification and utilization practices usually harmonize with the environment. This would amend the Forest Plan for those 2.5 miles of road but is not a substantial change requiring further analysis in the EA.

Correction 5: List of Preparers (page 5-1)

Add Daniel H. Deiss, Ecosystem Group Leader, as providing timber management input to the EA.

APPENDIX 5

COMMENT ANALYSIS

Appendix 5

Response to Comments Received from Notice and Comment Period

Boulder Top Watershed and Fisheries Restoration Project

During the 30 day Review and Comment period (June 3, 1997 to July 5, 1997) for the Boulder Top Watershed and Fisheries Restoration Project Environmental Assessment 23 comment letters were received. Three responses were received after the closing date and are noted as such. The pertinent comments of each letter were numbered, summarized, categorized, and documented as to who each individual concern would be addressed in the environmental analysis. The categories are:

1000 - Fisheries/Wildlife

- 1100 - Fisheries Sustainability
- 1200 - Fisheries Management
- 1300 - Management Indicator Species

2000 - Watershed

- 2100 - Road Surfacing and Design
- 2200 - Timber Harvest and Sedimentation
- 2300 - Livestock Grazing and Sedimentation
- 2400 - Other Uses and Sedimentation
- 2500 - Watershed Monitoring

3000 - Access Management

- 3100 - ORV Use
- 3200 - Road Closures
- 3300 - 4X4 Use
- 3400 - RS 2477
- 3500 - Road Reconstruction
- 3600 - Road Obliteration
- 3700 - Method of Travel

4000 - Forest Plan Amendment

- 4100 - Appropriateness of Timber Harvest

5000 - Roadless/Wilderness

- 5100 - Additional Roadless
- 5200 - Additional Wilderness
- 5300 - Biological Preserve

6000 - Recreation

- 6100 - Recreational Opportunities
- 6200 - Special Use Permits

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7000 - Law Enforcement and Education
7100 - Education and Enforcement
7200 - Season of Use

8000 - Social Economic
8100 - Social Economic Costs/Benefits

9000 - NFMA/NEPA
9100 - Alternatives Considered but Eliminated
9200 - Resolution of Comments in Appeal
9300 - Scoping and Public Notification
9400 - Cumulative Effects Analysis
9500 - Alternative Selection
9600 - Responsible Official
9700 - NFMA/NEPA/Forest Plan Compliance
9800 - Alternative Development

Letter 1

Comment 1 (3100): "Each time, however, the pleasure that I derive from these activities (fishing Boulder Top) was lessened by increased encounters with other campers and fishermen, especially those who used ORV's indiscriminately."

Response: By providing opportunities for both walk-in and drive-in fishing under the different action alternatives, it is believed that unwelcome encounters such as you described will be minimized. OHV's will be restricted to those roads remaining open.

Comment 2 (3200, 5100): "I strongly believe that the road to Crescent lake (FR #1286) should also be closed completely or partially. In doing so, the roadless area around Crater and Horseshoe lakes is significantly increased, providing greater opportunities for backcountry fishing, hiking, and camping."

Response: This proposal has been analyzed in Alternatives B, C, and D.

Comment 3 (2100): "...something needs to be done about the condition of the road to Spectacle Lake (FR #162)....By 1994, the road had significantly deteriorated with many boggy places containing several sets of alternative tracks, where there had been one or, at most two sets eight years before"

Response: This has been analyzed in Alternative A.

Comment 4 (3200): "People camped in the area around Row, Blue, and Purple lakes will continue to use this road to fish Spectacle and Rim lakes. I suggest that the road either be improved or closed."

Response: Reconstruction of FR #162 has been analyzed in Alternative A. It was considered for closure but eliminated as it is the major access route to Boulder Top from the southwest.

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Comment 5 (4100): "I support this amendment with a great deal of reluctance because 2A would still allow commercial logging, which I believe has no absolutely no place in Boulder Top's fragile environment....I find it ludicrous that you would allow commercial logging on Boulder Top with the enormous erosion and sedimentation problems associated with such activity and yet close roads to recreationists to alleviate these same problems."

Response: Timber harvest is still a valid use of 2A management areas. However, any future proposed harvest activities will take into account the effects of such activities on soil erosion, visuals, etc. to meet the desired future condition and management area direction for this area (see Dixie National Forest Land and Resource Management Plan pages IV-63 - IV-67).

Letter 2

Comment 1 (2100): "This area needs as few roads as possible if lake sedimentation and erosion are to be stopped."

Response: The EA has analyzed a wide spectrum of road closure possibilities ranging from closing 85.8 miles of road (Alternative B, pg 4-4) to not closing any roads (No Action, pg 4-2).

Comment 2 (7100): "I hope your plans include strict policing and enforcement of the changes you make."

Response: The District is aware that in order for any closures to be effective and strong public education and awareness program will need to be implemented. This would be used in conjunction with an increase in law enforcement presence.

Comment 3 (3100, 3300, 7100): "Please do everything you can to stop this menace (four wheelers) from ruining Boulder Top as well."

Response: While there are certainly some four wheel drive enthusiasts who abuse resources, they are most likely a very small segment of this user group which have a legitimate right to recreate on National Forest administered lands.

Letter 3

Comment 1 (3200): "In general I oppose the closing of primitive or dirt roads."

Response: The alternatives analyze a wide variety of closure options ranging from 0 miles of road closures in the "No Action" alternative to 85.8 miles of road closures in Alternative B & D.

Comment 2 (3200): "The closing of roads reduces the access that I currently have available."

Response: While it is true that some areas will no longer have motorized access in the action alternatives, the Forest is attempting to correct erosion problems that are coming off poorly located/constructed

roads while avoiding long-term maintenance costs. The Forest believes that, within the range of alternatives analyzed, there is a reasonable amount of motorized access that is still provided for.

Comment 3 (3300): "Four wheel drive recreation does not get the kind of respect and recognition that other forms (particularly hiking) do. This does not seem fair and truly strikes me of discrimination."

Response: There is room for a wide variety of recreation activities on Boulder Top. All of the action alternatives provide for four wheel driving on the roads to remain open.

Comment 4 (2100, 9100): "...closing roads is the cheapest way to mitigate the problems that are perceived to be caused by them, I do not agree that it is the best way even if the roads are the problem. It would seem preferable to build runoff breaks across roads or reroute sections."

Response: Initial costs for road closures could be expected to exceed routine yearly maintenance costs, however in the long run, yearly maintenance costs would exceed the closure costs.

Much of the sediment problem associated with roads on the Boulder Top is the result of improper location and design. Many roads have resulted from cross country travel rather than having been properly located and designed to facilitate anticipated traffic and drainage. To fix the existing problems would, in many cases, require expensive reconstruction and/or complete relocation.

Due to the way roads have evolved on the Boulder Top, most consist of trenched sections that trap and channelize runoff into confined corridors which accelerate sediment transport. The use of runoff breaks (intercepting dips, water bars, furrow ditches, etc.) would alleviate this problem somewhat by reducing the transport distance of the confined runoff, but would result in increased maintenance needs to keep the facilities in proper functioning condition. The terrain on much of the Boulder Top is basically flat, resulting in the need for relatively long flair ditches etc. to carry the runoff away from the roads. These ditches etc. have a tendency to silt in, thus requiring frequent maintenance to keep them functioning properly.

Comment 5 (6100): "The closing of roads reduces recreational opportunities for many people that cannot be mitigated by building hiking trails."

Response: As stated above, we have planned for a wide cross section of recreation activities on Boulder Top. Some activities require open roads and others (such as hiking) require the closing of roads to preserve the quality of experience and to minimize the chance to vehicular/pedestrian accidents.

Comment 6 (3300): "It is time the Forest Service recognized four wheel drive recreation as valid and not something that is expendable for some other goal."

Response: Please see the response to Comment 3 above.

Letter 4

Comment 1 (2300): "...would like more details on the amount of cattle grazing in the area and the new regulations that the ranchers have to comply to."

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Response: Currently, about 1600 head of cattle graze the Boulder Top for approximately one month from July 20th to August 20th. In addition, a new management system has been instituted that will defer use on the Top one year out of three. This will give the plants a chance to reach seed ripe prior to being used.

Letter 5

Comment 1 (1100, 2100): "The only lake that could possibly be impacted by siltation from road is Meeks Lake."

Response: Several lakes on Boulder Top have been identified as being impacted by sediment from roads. These are shown in Table 4-3 (pg 4-8). The degree to which sediment effects these lakes is influenced by several factors including road condition, proximity to a lake, soils, vegetation and other material which could impede sediment transport, as well as season and time of use by vehicles.

Comment 2 (6100): "I am aware that the Horseshoe lake road terminates considerably below the level of the lake....there is no reason to close the road."

Response: The road to Horseshoe lake does terminate below the level of the lake which is why it was not identified as contributing sediment to Horseshoe Lake (Table 4-3, pg 4-8). This closure was proposed in the Proposed Action as well as Alternatives A, B, and D to provide for a more semi-primitive recreational experience as well as providing for anglers with a better opportunity to catch above average size trout (pg 4-21, 4-23, 4-24, and 4-27 (see also errata).

Comment 3 (5200): "It appears to me that this is another part of the system-wide environmental agenda to convert National Forest Land into de-facto wilderness."

Response: Several of the possible alternatives propose reconstructing existing roads on Boulder Top. While the closure of some roads may create a "roadless" condition, it does not create de-facto wilderness. There are many attributes necessary for any area to be considered for wilderness. Roadlessness is only one of these attributes.

Comment 4 (9200): "I protest this action and ask that this proposal be cancelled."

Response: This decision is subject to appeal pursuant to Forest Service regulations at 36 CFR 215.7. Appeals must meet content requirements of 36 CFR 215.14.

Letter 6

Comment 1 (9300): "The Forest Service said that there has been very little public input on Boulder top road closing. It could be because the Forest Service has kept it a secret."

Response: It is difficult to directly contact every individual, organization, or agency that might have an interest in a project. The Teasdale Ranger District tried to solicit public input using several methods. On July 21, 1993 the Forest Service called or met with representatives from the Utah Division of

Wildlife Resources, grazing permittees, Southern Utah Wilderness Alliance, county commissioners and sportsmen. A scoping letter concerning the proposed action was sent out to all know potentially interested parties (approximately 120 letters were mailed) on August 16, 1993. When the project delayed, a update letter on the status of the project was sent to approximately 200 potentially interested parties on February 15, 1997 (pg 2-1). In addition, legal notices for a 30 day comment period were published in The Daily Spectrum (June 5, 1997), The Garfield County News (June 5, 1997), and The Richfield Reaper (June 4, 1997).

Comment 2 (3500): "If there is a sediment problem the roads in question should be fixed to stop the problem not close the roads."

Response: Much of the sediment problem associated with roads on the Boulder Top is the result of improper road location and design. Many roads have resulted from cross country travel rather than having been properly located and designed to facilitate anticipated traffic and drainage. To fix the existing problems would, in many cases, require expensive reconstruction and/or complete relocation.

Comment 3 (5100, 5200): "It looks to me as a underhanded way to get the Chokecherry Point area roadless so the Forest Service can make it into a wilderness."

Response: Alternatives A and C provide for keeping the road open all the way to Chokecherry Point. Alternatives B and D provide for keeping the road open almost all the way to Chokecherry Point. As stated above in response to Comment 3, Letter 5, there are many factors involved in creating a wilderness designation.

Comment 4 (1100): "And as for the fish dieing winter kill is the biggest problem not sediment."

Response: Winter kill is why trout in many of the lakes on Boulder Top are unable to survive through the winter period. Winter kill, however, can become more pronounced and frequent as lakes become more shallow. This occurs as more sediment enters and settles in lakes. While sediment in this instance is not directly killing trout, it indirectly affects their survival by making the lakes more shallow and prone to winter kill.

Letter 7

Comment 1 (3200): "Closing roads eliminates access that is currently available. It is not easy to mitigate that loss, a hiking trail won't do it for those of us who haven't got the time or the physical ability to backpack in."

Response: As stated in the EA, some roads are proposed for closure because they are contributing sediment to various fisheries. Without some type of protective action, the fisheries may be compromised. Some opportunities that now exist for motorized use will change depending on the alternative selected. This has been recognized and is discussed for each of the alternatives.

000372

Comment 2 (2100, 9100): "Why not install runoff breaks on the roads or reroute sections that resist repair?"

Response: Due to the way roads have evolved on the Boulder Top, most consist of trenched sections that trap and channelize runoff into confined corridors which accelerate sediment transport. The use of runoff breaks (intercepting dips, water bars, furrow ditches, etc.) would alleviate this problem somewhat by reducing the transport distance of the confined runoff, but would result in increased maintenance needs to keep the facilities in proper functioning condition. The terrain on much of the Boulder Top is basically flat, resulting in the need for relatively long flair ditches etc. to carry the runoff away from the roads. These ditches etc. have a tendency to silt in, thus requiring frequent maintenance to keep them functioning properly.

Comment 3 (3300, 6100): "I feel it is time for the Forest Service to recognize four-wheel drive recreation as valid and stop treating us as the fall guy."

Response: While it is true that some areas will no longer have motorized access in the action alternatives, the Forest is attempting to correct erosion problems that are coming off poorly located/constructed roads while avoiding long-term maintenance costs. The Forest believes that, within the range of alternatives analyzed, there is a reasonable amount of motorized access that is still provided for.

Letter 8

Comment 1 (2300): "Sheep grazing the area and trailing into the lake for water will do more damage to the area and result in more silt entering the lake in just one day than what a few vehicles travelling the road would in a full year."

Response: Improper use by livestock can certainly have detrimental effects on soils. Changes are being made in management of the cattle and sheep allotments on Boulder Top. Proper administration and adherence to the terms of the livestock permit are key to minimizing impacts.

Comment 2 (2400): "There is nothing to prevent so called Dude Ranches and packing outfits from taking a string of riding and pack horses with their iron clad shoes and dudes into the forest lake and other areas...iron clad shoes contribute to the erosion."

Response: Horse use can have an impact on soil erosion if it is excessive. Our analysis did not demonstrate this to be a major source of erosion at this point in time. Special Use Permits issued to those operators that provide outfitting and guide services, contain terms and conditions which are intended to minimize these impacts.

Comment 3 (6100): "Not all of the people who like to enjoy the scenery and an occasional fishing trip to the Boulder Mountain Lakes are able to carry back packs and hike several miles."

Response: As stated in the EA, some roads are proposed for closure because they are contributing sediment to various fisheries. Without some type of protective action, the fisheries may be compromised. Some opportunities that now exist for motorized use will change depending on the alternative selected. This has been recognized and is discussed for each of the alternatives.

000373

Comment 4 (1100): "...Raft Lake has suffered fish losses of(f) and on for the past 50 years."

Response: Personal observations by UDWR would agree with this statement. However, unless the amount of sediment entering the lake is reduced, winter kill will likely occur more frequently than it has in the past.

Comment 5 (2100, 9100): "...the eroded roads with a foot and a half deep gullies may need a little maintenance. A few well placed water bars could help disperse water from snow melt and rain showers and reduce sedimentation to the lakes."

Response: Due to the way roads have evolved on the Boulder Top, most consist of trenched sections that trap and channelize runoff into confined corridors which accelerate sediment transport. The use of runoff breaks (intercepting dips, water bars, furrow ditches etc.) would alleviate this problem somewhat by reducing the transport distance of the confined runoff, but would result in increased maintenance needs to keep the facilities in proper functioning condition. The terrain on much of the Boulder Top is basically flat, resulting in the need for relatively long flair ditches, etc. to carry the runoff away from the roads. These ditches, etc. have a tendency to silt in, thus requiring frequent maintenance to keep them functioning properly. Decreasing road maintenance budgets do not allow for the frequency of maintenance these structures would require.

Letter 9

Comment 1 (9100): "Our agency believes that an EIS should be initiated for the project before any road closures occur....From the perspective of this agency, the promise of an EIS early on in the planning process and the impacts of the proposed action on historical use of the area by adjacent communities warrants an EIS. With the new Monument (Grand Staircase and Escalante Canyons) and recent use's of EIS's by the Forest Service, it seems inherently reasonable to undertake an EIS in this case as well."

Response: Significance, both in terms of context and intensity, is what is used to determine if an EIS is prepared or an EA. The criteria that describe context and intensity are found in 40 CFR 1508.27, Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act, (as of July 1, 1986). Upon review of these ten criteria, it was determined that an EA was appropriate.

Comment 2 (3400): "...while it may be true that designation of the Boulder Top area as a Forest Preserve predates the "construction" of any road, some form of access to the Top likely existed, and therefore, R.S. 2477 issues may have to be reviewed before roads can even be closed. Even though there may be no historical justification for road access, a more detailed review of the R.S. 2477 issue definitely has a strong public interest justification to conduct an EIS."

Response: In 1866, Congress enacted a grant of rights of way over unreserved public lands. The grant was originally section 8 of the Mining Act of 1866 and later became section 2477 of the Revised Statutes - RS2477. RS2477 was passed to encourage the settling of the west of all lands not reserved. It granted a right of way for the construction of highways over public lands, not reserved for public uses.

In National Forest Lands, the right to establish new R.S. 2477 rights-of-way was lost at the time the National Forests were "reserved", for most Forests just after the turn of the century. Thus only those roads that had been constructed on National Forest Lands prior to reservation qualify as R.S. 2477.

Comment 3 (9400): "The EA document purports that sedimentation of mountain lakes is strongly attributable to "poorly located and poorly constructed roads" that access many of the Boulder top lakes (BTW&FRP, p.3-8). However, in two separate places in the same document, grazing by both wild and domesticated animals is also blamed for much of the sedimentation (BTW&FRP, pp. 4-11 & 3-4). It is reasonable to assume that both are causing the problem and that closing the direct access to the impacted lakes will help solve some (25% to 50%) of the problem."

Response: Wild and domestic livestock do contribute sediment to many of the lakes on Boulder Top (domestic, probably more so than wild). Closing the roads will help solve some of the problems as will implementing the new management system for the East Slope Cattle Allotment and sheep allotments on the Top.

Comment 4 (2100, 7100, 9100): "...the idea of terminating access prior to zones of impact does not seem to have been considered. Would not the problem of sedimentation be better addressed by rerouting and terminating direct access to the lakes impacted than by simply closing so much road access in the Boulder top area in general."

Response: Terminating access prior to zones of impacts was discussed and considered as a method for reducing erosion. However, it was felt that having closures near main roads would make enforcing the closures easier and more cost efficient given the time it takes to patrol the Boulder Top area. Rerouting roads would require new construction which would be very expensive and would still require existing roads that are contributing sediment to be obliterated.

Comment 5 (5100, 5200): "...many of the proposed road closures do not directly benefit lakes most impacted by road sedimentation (access to Chokecherry and Donkey Points for example). However, those road closures along with the road closure to the Crater Lake area, does create three new sizeable roadless areas on the mountain. The potential for these roadless areas to be converted into wilderness is a cause for concern."

Response: Several of the possible alternatives propose reconstructing existing roads on Boulder Top. While the closure of some roads may create a "roadless" condition, it does not create de-facto wilderness. There are many attributes necessary for any area to be considered for wilderness. Roadlessness is only one of these attributes.

Comment 6 (4100, 9100): Paraphrased. "The proposal to change management directives from 7A (Wood Production and Utilization) to 2A (Semiprimitive Recreation) creates concern due to the differences between the two management classifications. 2A pushes for an experience of remoteness and even though opportunities exist for "active management", such management must be compatible with the primary intent of semi-primitive recreation. 7A is, on the other hand, a designation consistent with forest areas that are managed to provide the best possible conditions for the harvest of timber. In this category, recreational users are secondary to the primary intent of harvesting. An EIS would be a more appropriate forum to discuss this concern than an EA."

Response: According to our planning regulations (36 CFR 219.10(f)), the Forest Supervisor may amend the Forest Plan if it is a non-significant amendment. One example of "not-significant" in the Forest Service manual (FSM 1922.51) is "adjustments of management boundaries or management prescriptions resulting from further on-site analysis when adjustments do not cause significant changes in the multiple-use goals and objectives for long-term land and resource management." Forest Service Handbook FSH 1909.12, 5.32, was also reviewed to determine if the amendment is significant relative to changes in the Forest Plan. Since the proposal to amend the Forest Plan designation of Boulder Top from 7A to 2A does not change the Forest's allowable sale quantity, given the future projections of timber harvest needs on Boulder Top, an EA is adequate to make this decision. Timber harvest activities will still be allowed on Boulder Top and will likely be similar to the amount of harvest that has occurred in recent years. There are no anticipated changes to livestock management as a result of the proposed amendment either.

Comment 7 (6100): "Recreational uses have historical content and should be considered when evaluating impacts. The EA estimates that the Preferred Action will cause a 30% decrease in dispersed camping activities (BTW&FRP, p.4-71), and therefore will have a significant impact on adjacent communities historical recreational uses."

Response: The EA does not indicate a "Preferred Action". On page 4-71, it is asserted that if "the Proposed Action" were implemented, there would be a 30% decrease in Recreation Visitor Days (RVD's) overall. This reduction was derived from changes in other recreational activities as well including dispersed camping, fishing, hunting, etc.

Comment 8 (6100): "The other recreational issue not adequately addressed by the EA is the increased visitation to the new Monument. While it is true that many more people will use Boulder Top because of road closures, many visitors may simply be wanting to camp away from the extreme summer heat of the Monument. The Preferred Alternative will eliminate a significant number of dispersed camping opportunities (caused by road closures); thereby increasing impact on lakes where access is maintained and which are in fact many of the same lakes already subject to heavy sedimentation."

Response: Again, the possible reduction of dispersed camping opportunities under the Proposed Action means only that some recreationists would be displaced to other parts of the Dixie National Forest or, perhaps, to other nearby national forests. Similarly, Monument visitors seeking relief from summer heat would utilize other high elevation forest areas along with the Boulder Top. Use at some lakes (ie, those proposed for stocking with catchable trout) will likely increase under a action alternative. Monitoring of the effects of implementing any alternative is an integral part of any alternative. The purpose of the monitoring is to determine if the actions that are implemented are effective. If they are not effective, additional measures could be considered with appropriate review and assessment.

Letter 10

Comment 1 (3500): "Better roads mean more people...which leads to more impact/abuse, and ultimately to more habitat destruction (watershed and other). Local problem areas only should be modified or reconstructed; where there is clearly major erosion documented."

Response: Construction/reconstruction of roads has been held to a minimum throughout the analysis process. The No Action Alternative, and Alternative "B" contain no miles of construction or

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reconstruction. 0.5 miles of new construction is identified for the other alternatives with reconstruction varying between 9.6 and 26 miles. The construction/reconstruction activities are associated with roads classified as arterial or collector. No local roads are identified for construction/reconstruction activities.

Comment 2 (7200): "Do not open all roads on June 15th if they are not suitable for travel at this date. Much of the deep rutting appears to be from this abuse."

Response: The existing travel restrictions from November 1st thru June 15th were established to prevent vehicular use of the road system during the period of time when damage was most likely to occur. Weather conditions fluctuate from year to year making seasonal closures hard to administer. In many years the area is not opened until after June 15th depending on road conditions. You are correct in stating that much of the rutting comes from this type of abuse.

Comment 3 (2300): "Face the issue of grazing realistically and take steps to solve the problems of this major fact in erosion and sedimentation and habitat destruction."

Response: This has been addressed in the new East Slope Allotment Management Plan and the changes that are being made in management of the sheep allotments.

Comment 4 (8100): "Why spend close to a million dollars to fix (maybe) the second most important problem. Nearly one million dollars is excessive for such a one-sided fix."

Response: The costs for implementing the alternatives range from an estimated \$1,422,300 for Alternative A to \$166,300 for Alternative B. Depending on the alternative or mix of alternatives selected, these estimates provide a range of costs that could be anticipated. Livestock grazing concerns relative to improving vegetation and watershed conditions, have been addressed in the East Slope Cattle Allotment Plan and are described further in the response to Comment 1, Letter 3.

Comment 5 (5300): "Create more and much larger exclusion areas for the potential of endangered and all plant life."

Response: This is beyond the scope of the purpose and need as described in this EA. The project purpose and need is to improve and restore watershed conditions.

Comment 6 (6100): "Do minimal construction on all roads to keep the number of visitations minimal and well motivated."

Response: Design practices and procedures would be consistent with established standards, guidelines, and specifications relating to the reconstruction of Forest Development Roads. Emphasis would be placed on proper drainage and sediment control of the facilities. Re-alignments would be kept to a minimum to confine reconstruction activities to areas already disturbed.

Letter 11

Comment 1 (4100, 6100): "After thoroughly reviewing the proposal to change the management area designation from 7A to 2A, I have several concerns. First, the proposal would severely limit most forms of recreation and logging. I am very much opposed to this type of limitation because it is offensively discriminatory."

Response: Each of the action alternatives have varying levels of access by use type (ie, motorized, non-motorized). The miles of roads open to motorized use in the action alternatives varies from 46 to 113.5 miles as compared to the current 132 miles of open road. As discussed in the EA (page 4-6), changing the management area designation from 7A to 2A will not affect the Forest's allowable sale quantity, livestock use, or minerals management.

Comment 2 (8100): "I cannot find any monetary justification in this proposal."

Response: The Social Economic section in Chapter 4 (pages 4-97 - 4-101) discusses the economics of the alternatives.

Comment 3 (1200): "I cannot help but wonder why we are so bent on preserving habitat for fisheries which are not native to this area."

Response: Goals 13 and 14 in the Dixie National Forest Land and Resource Management Plan state that the Forest coordinate and plan projects that may have effects on fish and wildlife populations (with special emphasis on Management Indicator Species which include non-native trout) and that the Forest improves the quantity and quality of aquatic habitats through direct habitat improvement and increased coordination with other land use programs (page IV-5). The desired future condition for fisheries on the Forest is to improve conditions by increasing the habitat capability by expanding present habitat in marginal lakes (page IV-20).

Comment 4 (9500): "I strongly encourage you to more closely examine Alternative A."

Response: We will consider your comment.

Letter 12

Comment 1 (9600): "Since changes are proposed in the Forest Plan, Forest Plan Development Road System and Forest Travel Plan, the responsible official should be the Forest Supervisor."

Response: The Forest Supervisor will be the responsible official.

Comment 2 (3200): "The rationale for elimination of roads is illogical. Forest Development Roads are either needed for the management and use of forest or they are not."

Response: Many of the roads existing on the Boulder Top have resulted from past dry logging activities. They were needed at the time of harvest, but are no longer needed for management of the area. One of the purposes of this analysis is to identify existing transportation facilities that are no longer

required for future anticipated management of the area. The alternatives considered cover a wide range of proposed closures varying from no closures to 85.8 miles of closure, depending on management objectives chosen by this analysis.

Comment 3 (2100, 9100): "An alternative not considered, and must be, is to maintain roads to minimize erosion and sedimentation. Lack of maintenance to protect the watershed and fisheries resource is unexcuseable."

Response: The nature of the roads as they exist, prevents proper maintenance to minimize erosion and sedimentation. Most of the roads consist of trenched sections that prevent proper maintenance, and tend to deepen with each runoff event, and subsequent blading of the roadway. Properly constructed intercepting dips, water bars etc. would help, but they would not eliminate the problem. Most of the roads causing sedimentation problems would require complete reconstruction consisting of extensive borrow placement to build them up and eliminate the trenched sections.

Comment 4 (2200, 2300, 2400): "Sediment numbers (tons/yr) are bogus. These numbers were apparently extrapolated from an old study without considering the many variables. What is the relationship to other sediment sources, natural and man caused?"

Response: The sediment values were calculated using the Universal Soil Loss Equation applied to surface area of roadbed and ditches of roads proposed for each alternative, and consider erosion from road activities only. Although the values do not include other sediment sources, and may vary from actual values, they are provided to allow comparison for each alternative, rather than relying only on acreage or miles of road treated.

Comment 5 (4100, 5100): "I am opposed to the conversion of Chokecherry and Donkey Points from roaded areas to roadless areas. Denial of access and conversion from timber management to semi-primitive recreation will reduce timber harvest."

Response: None of the alternatives is proposing to create "roadless areas." Timber harvest activities can still occur and roads can still be used to access timber as appropriate. Once the activity is completed, however, the traffic will be controlled to whatever degree necessary to maintain the desired forest setting (see Dixie National Forest Land and Resource Management Plan page IV-63).

Letter 13

Comment 1 (9500): "We think it (Boulder Top) should be left as it is."

Response: This is the No Action alternative. Thank you for your comment.

Comment 2 (1100): "We have observed that the fish winter kill on drought years because of low water in lakes and when we have a good snowpack the fish survive because the lakes stay full."

Response: Low water years certainly have the potential to influence over winter survival of trout. This is because the lakes are more shallow, similar to what they would be if sediment continues to be deposited at a higher rate than normal. Low water years and continued sediment deposition would make over-winter survival even less likely.

Comment 3 (6100): These fish resources should be for everyone old and young and not for the few environmentalists."

Response: None of the alternatives preclude older or younger persons from using the fishery resources.

Comment 4 (5100, 5200, 5300): "We also think that this is just another way to lock up the top of Boulder."

Response: An alternative to close all of the roads on Boulder Top was considered but eliminated from further analysis as there was no reason to prohibit the use of motorized vehicles in some areas on Boulder Top.

Comment 5 (9700): "The money that went into this study should have been put to upgrading roads on the Dixie National Forest."

Response: Allocations for road improvements are specified as such. The money spent on this analysis was to look at the sediment concerns from roads to lakes on Boulder Top.

Comment 6 (8100): "The \$900,000 plus should be put to better use than locking up this beautiful area."

Response: One purpose of the proposed project is to initiate actions that would improve watershed conditions, fisheries, and the road system on Boulder Top to reduce on-going damage to the aquatic environment, not to deny access to scenic lakes and view points. Various methods of access (motorized and non-motorized) to these areas are presented in the alternatives. The costs for implementing the alternatives range from an estimated \$1,422,300 for Alternative A to \$166,300 for Alternative B.

Letter 14

Comment 1 (9800): "In general, there seems to be little rationale for the particular roads to be closed in the Proposed Alternative as compared to those to be closed in the other alternatives. Each alternative seems rather arbitrary in this regard. For example, road 177 (Chokecherry) is closed in the Proposed Alternative, but open in Alternative B and D. Why?"

Response: The mix of road closures was intended to respond to the combination of issues as discussed on pages 2-2 and 2-3 of the EA.

Comment 2 (1100, 2100, 3500, 6100): "Little justification is given for reconstruction of road 178 from Cooks lake to Pleasant Creek meadows. Presumably, this is to decrease erosion on or near this road resulting in damage to fragile meadows. Or is it only to provide better access to the lakes it serves?"

Response: Reconstruction of road 178 is for all of the reasons you stated. Reconstruction is for the purpose of reducing erosion and providing a roadbed that would not result in braided or multiple roads in some areas. The reconstruction would improve access to areas adjacent to road 178 by the fact that it would be an improvement over the existing road.

Comment 3 (9500): Table 4-1 indicates there are 11 lakes affected by roadbed erosion on the Top (6 high and 5 moderate), with an estimated total of 392 tons/year of sediment from roadbeds. The Proposed Alternative, however, will affect only 4 lakes in the high category and 1 in the moderate category, with a reduction in sediment to 297 tons/year, a decrease in sediment of only 24%, and a restoration of only 71 acres. Compare this with alternatives B and D, which result in 56% and 51% reductions in sediment and restoration of 130 acres each. It appears the Proposed Alternative will have a rather minor effect on both sediment and acres restored (about half of Alternatives B and D)."

Response: You are correct. The range of alternatives analyzed recognizes this. A Proposed Action does not necessarily mean that it will be the selected alternative. We will consider your comments.

Comment 4 (errata): There appears to be an error in Table 4-2: restoration area for Alternative A should be 31 acres, not 130. In Table 4-3, Horseshoe Lake is closed in Alternative C and open in Alternative D; the maps, however, indicate the reverse is the case."

Response: Thank you for bringing this error to our attention. You are correct, the restoration area for Alternative A as shown in Table 4-2 should be 31 acres (as analyzed on page 4-11 of the EA). Table 4-3 as you mention is also incorrect. Alternative C should be open to Horseshoe Lake and Alternative D should be closed. The maps and tables in Appendix 3 are correct. These corrections are noted in the errata.

Comment 5 (2100, 6100, 9800): "The area from Pleasant Creek Meadows to Bowns point remains completely open for motorized travel on roads in the Proposed Alternative, and even partially open in Alternatives B and D. There are no fishing lakes in this area, but the meadows have been badly abused by ORV's and OHV's, driving anyplace they please. What is the point of leaving these roads open, since they lead nowhere and contribute greatly to watershed destruction?"

Response: Roads for motorized travel will be posted open under the action alternatives. No motorized use, other than over snow vehicles, will be allowed in other areas (including meadows). Public education and enforcement will be crucial for the project to be successful.

Comment 6 (9500): "Much more could be achieved by combining the best parts of the Proposed Alternative (vide supra) with Alternative D. This would have a major impact on 8 of the 11 impacted lakes (by including Raft Lake from the Proposed Alternative with the 7 lakes closed in D), protect some of the meadows from further degradation, and still provide considerable access to the major lakes to be left open in the Proposed Alternative. This action would come considerably closer to fulfilling the stated purposes of the project and provide a measure of protection for a majority of the lakes on The Top that are currently being degraded by sediment from roads."

Response: Any alternative or combination thereof may be selected. We will consider your input.

Letter 15

Comment 1 (2100, 2200, 9400): "This biologically critical area has been heavily degraded by logging..."

Response: The road building activities on Boulder Top are partially why this project has been proposed.

Comment 2 (9100): "The proposal does not go far enough to emphasize restoration, especially with no regards to preservation."

Response: We feel that the range of alternatives that were analyzed met the purpose and need of the project. Other uses that occur on Boulder Top are valid uses.

Comment 3 (3200, 3600): "It is much less expensive for USFS to obliterate roads than maintain them."

Response: Initial costs for obliteration are expected to exceed routine maintenance costs, but in the long term, obliteration costs will be substantially cheaper than trying to maintain the existing trenched nature of the roadways.

Comment 4 (2300, 9400): "Livestock need to be removed in large numbers to comply with NEPA. Livestock removal is one of the greatest steps towards watershed preservation conceivable."

Response: Currently, about 1600 head of cattle graze the Boulder Top for approximately one month from July 20th to August 20th. In addition, a new management system addressed in the Revised East Slope Cattle Allotment Management Environmental Assessment completed in 1995, has been instituted that will defer use on the Top one year out of three. This will give the plants a chance to reach seed ripe prior to being used. Other causes of erosion (livestock grazing, timber harvest, etc.) have been considered in the Environmental Assessment (see cumulative effects discussions in Chapter 4).

Letter 16

Comment 1 (1100, 1200): "Prior to 1944 no trout fisheries existed....the majority of lakes atop the Boulder Mountain were shallow to begin with and lacked outlets to supply year round flows necessary to provide a sustainable ecological environment."

Response: You are correct in that no trout fisheries existed on Boulder Top prior to 1944 (see EA page 3-7). UDWR, through stocking, has provided fisheries that are sustainable for many years.

Comment 2 (1100, 1200): "...the primary objective of the USFS is that of promoting fishery productivity where prior to 1944 no fish were present in the area. In this case it is not irrational to introduce trout fisheries in the area but to introduce them in a naturally unsustainable environment and treat them in a manner consistent with a threatened species."

Response: UDWR is responsible for fish management within the state of Utah, and the Forest Service is responsible for managing the habitat where the species live on Forest Service administered lands. The fisheries on Boulder Top do provide a recreational opportunity that many people enjoy. None of the fisheries on Boulder Top are treated in a manner consistent with a threatened species.

000381

Comment 3 (1200): "The Boulder Top Watershed and Fisheries Restoration Project proposal provides much detailed focus on "mitigation requirements for action alternatives to offset the loss of vehicle accessible fisheries" ...A key point of frustration here is that there is no guarantee to the trade-off that UDWR will be willing to stock Big, Noon, Ridge, and Dead Horse lakes. This is to the fishermen, of which I am not, an inequitable proposition."

Response: Since UDWR is responsible for actual management of fish populations (ie, stocking, regulations, etc.) the Forest can only encourage and work with UDWR to stock the lakes you mention. The UDWR has expressed support for this as mentioned in their Comment 1, Letter 24, below.

Comment 4 (6100, 9800): "For the non-fishing recreationist utilizing motor vehicles as a means to accomplish desired objectives such as hunting, sight-seeing, gem and stone hunting, mushroom identification, four wheeling, and motorcycling among others, there has been no effort under the current proposal and Action Alternatives A, B, C, and D to provide consideration in return for the closure of roads indicated other than to encourage the UDWR to plant fish in Big, Noon, Ridge, and Dead Horse lakes."

Response: You are correct in that no new roads are being proposed to offset the potential loss of motorized access. We do feel, however, that an adequate amount of roaded access would still be available for motorized use.

Comment 5 (6100): "If the Proposed Action or any of the Alternative Actions under the restoration project proposal are implemented, my mother as well as many physically challenged individuals will again experience a great injustice."

Response: We have planned for a wide variety of recreation activities on Boulder Top. Some activities require open roads and others (such as hiking) require the closing of roads to preserve the quality of experience and to minimize the chance to vehicular/pedestrian accidents. Some roads are proposed for closure because they are contributing sediment to various fisheries. Without some type of protective action, the fisheries may be compromised. Some opportunities that now exist for motorized use will change depending on the alternative selected. This has been recognized and is discussed for each of the alternatives.

Comment 6 (9500): "I implore you as a respected District Ranger to consider the No-Action Alternative as the only rational approach to the available alternatives discussed in the Environmental Assessment of the Boulder Top Restoration Project."

Response: We will consider your comment.

Letter 17

Comment 1 (9500): "We are very disappointed that the Forest Service produced an EA and selected an alternative that is heavily biased and discriminates against a large segment of users and potential users."

Response: The EA did not select nor identify a preferred alternative. A range of alternatives with a range of effects was analyzed as required by NEPA.

000382

Comment 2 (5200, 9300): "It is interesting to note that this process began with meetings involving only governmental agencies, commercial users, and a radical and discredited "environmental" organization whose agenda calls for the elimination of motorized travel/recreation from public lands. The fact that no OHV user groups were invited to participate indicates that the process was preconceived to provide whatever pretexts necessary to close as many roads as possible and move the management of Boulder Top toward future candidacy for Wilderness Designation."

Response: During the public scoping phase of this project, the District received a wide range of inputs for the proposed project. The comments ranged from close all roads to keep all roads open. As discussed in the response to Comment 1, Letter 6, the District attempted to reach as many interested individuals as possible for input using a variety of methods. This EA is not a preconceived attempt to move the Boulder Top toward future candidacy for Wilderness Designation.

Comment 3 (1100, 2100, 2200, 2300): "Is silting a real problem? If so, what percentage is due to vehicular routes? The document only states that "Studies and observations" show that "many" of the lakes are receiving "increased amounts of sediment, much of which is coming from roads."

Response: When you look at the roads going to several of the lakes on Boulder Top it is very apparent that the gullies that have formed are leading directly into the lakes. Sediment fans have formed in the lakes where the sediment is being deposited causing the lakes to become more shallow. Although sediment entering the lakes comes from other sources as well (grazing impacts, natural processes, etc.) as identified in the EA, roads are having a definite impact. Studies were not done to quantify the amount of sediment that is being transported for other reasons. However, the Revised East Slope Cattle Management Plan considered impacts by livestock and has resulted in management changes.

Comment 4 (1100, 2100): If the silting is real and indeed caused by the roads, then we must ask if the survival of non-native fishes in a few lakes is worth denying traditional travel rights to thousands of persons."

Response: Goals 13 and 14 in the Dixie National Forest Land and Resource Management Plan state that the Forest coordinate and plan projects that may have effects on fish and wildlife populations (with special emphasis on Management Indicator Species which include non-native trout) and that the Forest improves the quantity and quality of aquatic habitats through direct habitat improvement and increased coordination with other land use programs (page IV-5). The desired future condition for fisheries on the Forest is to improve conditions by increasing the habitat capability by expanding present habitat in marginal lakes (page IV-20).

Comment 5 (2100, 9100): "...are there other ways to prevent soils from washing into the lakes short of closing the routes."

Response: Much of the sediment problem associated with roads on the Boulder Top is the result of improper location and design. Many roads have resulted from cross country travel rather than having been properly located and designed to facilitate anticipated traffic and drainage. To fix the existing problems would, in many cases, require expensive reconstruction and/or complete relocation.

Due to the way roads have evolved on the Boulder Top, most consist of trenched sections that trap and channelize runoff into confined corridors which accelerate sediment transport. The use of runoff breaks (intercepting dips, water bars, furrow ditches, etc.) would alleviate this problem somewhat by reducing

the transport distance of the confined runoff, but would result in increased maintenance needs to keep the facilities in proper functioning condition. The terrain on much of the Boulder Top is basically flat, resulting in the need for relatively long flair ditches etc. to carry the runoff away from the roads. These ditches etc. have a tendency to silt in, thus requiring frequent maintenance to keep them functioning properly.

Comment 6 (5200): "As roads are obliterated and re-seeded, much of the area will then become eligible for Wilderness Designation, which we feel is the real driving force behind this plan."

Response: Several of the possible alternatives propose reconstructing existing roads on Boulder Top. While the closure of some roads may create a "roadless" condition, it does not create de-facto wilderness. There are many attributes necessary for any area to be considered for wilderness. Roadlessness is only one of these attributes.

Comment 7 (9400): "The EA does not adequately address the amount of additional silting might occur as a result of the obliteration and building process, which will require disturbance of huge amounts of compacted and relative stable soils."

Response: The EA does state that erosion rates will increase from road activities (see Water Quality section, paragraph 2). Mitigations are prescribed to lessen erosion rates from these activities (Mitigations #5, 6, 7, 8, 9). Erosion calculations factor in the effects of these mitigations.

Comment 8 (6100): The proposed action caters to the belief that motorized and non-motorized users are incompatible and that non-motorized users have rights that are superior to all others."

Response: There is no statement in the EA to support this assertion. All the action alternatives provide a wide spectrum of recreational opportunities on Boulder Top.

Comment 9 (6100): "Rather than closing roads and trails, you should be opening them to all appropriate user modes."

Response: Leaving all of the roads open would not meet the purpose and need of the project which is to protect fisheries. The No Action Alternative considers and analyzes the effects of all of the roads remaining open. Thank you for your comment.

Comment 10 (3700): "The EA places all OHV's in one category and fails to address the status of Off Highway bicycles. Any reasonable plan must recognize that OHV's are not a homogeneous group, rather there are several distinct types, each with differing characteristics and impacts."

Response: From the information available, not much is known about "off highway bicycle" use on Boulder Top. However, observations by Teasdale Ranger District personnel indicate that bicycle use is minimal in comparison to motorized OHV use.

Comment 11 (3700, 6100): "Motorbikes and bicycles have much the same impact on surfaces and both can travel on narrow single track trails, and thus any regulations that apply to one must also apply to the other. Allowing bicycles but banning motorbikes is discriminatory because it essentially endorses vehicle use for those with sufficient strength, endurance, and good health while prohibiting such use for those who do not enjoy these qualities."

Response: While motorbikes and trail bikes may have similar impacts on trail surfaces, the extra power, speed and noise of motorbikes places them in a different category when it comes to disturbance to other recreationists. With all of the action alternatives, there are ample opportunities to ride motorbikes on the Boulder Top.

Comment 12 (7100): "We recommend public education as the best method of minimizing this type of impact."

Response: Public education, including informational signing, will be relied upon heavily to reduce impacts in any of the alternatives selected.

Comment 13 (3700, 6100): "We ask that you consider incorporating these three distinct classes (two-wheeled, ATV's and Four Wheel Drive) into the planning process. We also ask that you reevaluate the status of all single track trails to allow motorbikes on all single track trails to allow motorbikes on all trails open to off highway bicycles."

Response: Your comment is noted.

Comment 14 (3200, 6100): "The EA is also flawed because it completely ignores the intent of the American Disabilities Act which specifically requires that public facilities be made accessible to ALL AMERICANS. Many OHV users are elderly and/or disabled in ways that prevent them from hiking and climbing long distances to access desired locations on public lands. When you close existing travel routes you are denying these people the access guaranteed under this important federal legislation."

Response: The action alternatives provide for a wide variety of recreation opportunities by several access methods while still meeting the purpose and need of the project.

Comment 15 (8100): "...we are offended that you are suggesting the expenditure of nearly one million dollars of our hard earned money for the purpose of denying access to scenic lakes and view points."

Response: One purpose of the proposed project is to initiate actions that would improve watershed conditions, fisheries, and the road system on Boulder Top to reduce on-going damage to the aquatic environment, not to deny access to scenic lakes and view points. Various methods of access (motorized and non-motorized) to these areas are presented in the alternatives. The costs for implementing the alternatives range from an estimated \$1,422,300 for Alternative A to \$166,300 for Alternative B.

Comment 16 (9500): "Because this document is so biased and flawed, and the proposed actions so arbitrary and capricious, we ask that it be withdrawn and the NO ACTION alternative adopted."

Response: Alternatives were developed to respond to significant issues that were identified as a result of the public scoping process.

Comment 17 (9800): "If a new study is undertaken, we ask consideration be given to (1) opening all single track trails to bicycles and motorbikes, and (2) constructing a primitive "rim road" around the edge of the Boulder Top to allow access to the spectacular views to vehicle assisted users."

Response: All of the alternatives provide some level of motorized access to several or all of the view points along the rim. A non-motorized rim trail is also currently being constructed which will provide access to several view points. Construction of a rim road is beyond the scope of this Environmental Assessment.

Letter 18

Comment 1 (9500): "I would like to see as many peripheral roads as possible closed, perhaps combining the closures shown in the Proposed Alternative and Alternative D."

Response: Consideration can be given to combining portions of any alternative.

Comment 2 (9500): "Reconstruction of the main roads should be kept to a minimum to control erosion and correct bad design."

Response: Design practices and procedures would be consistent with established standards, guidelines, and specifications relating to the reconstruction of Forest Development Roads. Emphasis would be placed on proper drainage and sediment control of the facilities. Re-alignments would be kept to a minimum to confine reconstruction activities to areas already disturbed.

Comment 3 (6100): "Too good a road will also encourage a huge increase in visitation that may negate the decrease in erosion that is the goal of the project."

Response: While some of the proposed reconstruction would encourage additional visitation to the general area, a huge increase which could negate the goals of the project, is not anticipated.

Comment 4 (3500): "I also fear that the real disguised reason for major road improvement may be to provide for future timber sales."

Response: The roads proposed for reconstruction are to help reduce erosion while still providing reasonable access. Reconstruction is not for the purpose of providing improved access to any potential timber sales in the future.

Comment 5 (1200): "In natural lakes with persistent winter kill problems, it may be time to reconsider how appropriate it is to continue to introduce exotic species (trout) into an ecosystem where they did not exist before placed there by man."

Response: If the frequency of winter kill increases, the UDWR will need to assess if it is biologically or economically beneficial to maintain the fishery. The UDWR is responsible for managing fish populations (ie, stocking, regulations) within the state while the Forest Service is responsible for habitat management on Forest Service administered lands.

Comment 6 (7100): "How will road closures be enforced? It will not be easy to keep ORVs and 4 wheelers from just making their own "road" where they want."

Response: Boulder Top is somewhat difficult to access as frequently as we would like for enforcement purposes. However, a concerted effort will be made to patrol the area, allow use on only those roads that are posted open, as well as implementing a public education/awareness program.

Letter 19

Comment 1 (9700): "An EIS seems necessary not only to develop management plans to implement the resolutions in the EA, but also to address major questions that are inseparable from the objectives stated therein. The siltation of lakes almost certainly does not originate in runoff from roads, nor is the closure of roads the only ecologically beneficial action that can be taken to remedy observed siltation of lakes."

Response: Significance, both in terms of context and intensity, is what is used to determine if an EIS is prepared or an EA. The criteria that describe context and intensity are found in 40 CFR 1508.27, Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act, (as of July 1, 1986). Upon review of these ten criteria, it was determined that an EA was appropriate.

Comment 2 (2300, 9400, 9700): "Other causes should be fully considered as causes of siltation and fisheries deterioration, possibly of magnitude as great or greater than roads, and inseparable from roads. Cattle should be gotten off Boulder Top. We appreciate very much the recognition expressed in the EA that areas changed to 2A will see drastically restricted grazing."

Response: Other causes of erosion (livestock grazing, timber harvest, etc.) have been considered in the Environmental Assessment (see cumulative effects discussions in Chapter 4). The effects of cattle grazing on a portion of Boulder Top was addressed in the Revised East-Slope Cattle Allotment Management Environmental Assessment completed in 1995. Livestock grazing, under proper use criteria, is a legitimate use on Boulder Top use will continue irrespective of the access and Forest Plan amendment decisions made as a result of this EA.

Comment 3 (4100): "Timber should be left alone. Reclassification from 7A to 2A is a pivotal action. As with grazing, we urge you to consider much more area in this project to accomplish meaningful restoration of watershed and fisheries, as well as native ecosystems and floral and faunal communities of non-use nature. The direct economic value of Boulder Top timber is paltry, compared to the value of an undisturbed forest."

Response: Timber harvest is also an appropriate use in areas designated as 2A. Timber management, however, should not be evident but remain visually subordinate.

Comment 4 (1200): "The rainbow trout is the wrong species to promote in these high altitude lakes and streams. Indeed, almost anywhere in Utah, the rainbow trout is so predatory on native frogs, amphibians and invertebrates that species after species has been sent into serious decline...Please consider the alternative of ceasing this practice on Boulder Top, strengthening instead native cutthroat and area-specific varieties of fish..."

Response: While rainbow trout are not native to Utah, they are widely used for management purposes. In this case, they will be stocked as catchable size trout on an annual basis in several lakes that have been stocked by UDWR in the past. Currently, hatchery production of Colorado River cutthroat trout does not exist in the state.

Comment 5 (1100, 1200): "Oligotrophic lakes stocked with rainbows can only produce starving rainbows.."

Response: The lakes that will be stocked with rainbows are productive and can produce catchable trout for anglers. The UDWR determines the management objectives, stocking rates, regulations, etc.

Comment 6 (9100): "Channelized flow gets collected on roads very readily, and this flow breaks through into streams and lakes. These points of silt transport are locations of potential wetlands enhancement for the defense of downgradient waterbodies. It is worth considering low-tech mechanisms to encourage small retention basins to develop stands of marsh species that are native to Boulder Top."

Response: While these methods can be used to trap sediment, correcting erosion problems at the source (roads in this case), will achieve the project objectives in a manner that is compatible with 2A management and the desired setting.

Comment 7 (9800): "Please continue the line of investigation represented in this EA, but please also direct it more toward ecological restoration as well as toward the long-term future of Boulder Top."

Response: Monitoring within the project area will help guide future management.

Letter 20

Comment 1 (9100, 9500): "We encourage the upgrading of roads as addressed in alternative A. We also request an intensive study of the 18 miles scheduled for closure under Alternative A to identify new measures to closing those roads identified (roads into Chuck, Surveyors, Meeks, Horseshoe, and Crater Lakes)."

Response: We will consider your comments. Other methods, such as water bars, etc. are discussed in Comment 4, Letter 2.

Comment 2 (4100): "Despite written assurance that the change from 7A to 2A status will not preclude future timber harvest or the allowable timber harvest for the forest, we do not feel comfortable in supporting such a decision. Timber harvest and identification of an area as 7A does not preclude semi-primitive recreation, 2A. However, there does not seem to be strong enough language in the document to assure future harvest in the areas of 7A emphasis awaiting change to 2A emphasis. Neither does the reference to "Forest" in paragraph five of "Purpose and Need For This Project" page 1-2 provide sufficient clarity as to whether the reference is specific to the acreage under consideration or to the entire Teasdale District or Dixie Forest."

Response: Changing emphasis from 7A to 2A will not preclude timber harvest (see Dixie National Forest Land and Resource Management Plan, pages IV-63 - IV-67). Since little harvest has occurred on Boulder Top in the recent past and projected future, the Dixie National Forest's allowable sale quantity is not expected to be affected by any of the proposed actions.

Letter 21

Comment 1 (2200,2300, 9400): "...some people expressed concern with the effects of grazing and logging on the sedimentation and erosion problems. However, your comparison criteria do not at all address this concern with grazing and logging. While we recognize that a substantial amount of sedimentation and erosion results from roads/routes, you need to evaluate and analyze the effects of other activities on these lakes...the EA also fails to address sedimentation and erosion caused from Off Road Vehicle (ORV) use.."

Response: While there is erosion due to grazing and logging, survey information and observations by the UDWR and Forest Service, indicated high sedimentation rates in specific lakes caused by improper road locations and/or roadbed condition. Erosion from these roads is much greater than other sources and therefore, a more urgent problem when considering the consequences of not taking action in order to correct them...The project was initiated in order to correct the road sedimentation problems. In addition, an Environmental Assessment entitled "Revised East Slope Cattle Allotment Management" was completed in 1995 and describes the effects of livestock grazing on a substantial portion of Boulder Top. Although grazing has certainly impacted vegetative cover, the trend is towards improvement.

Comment 2 (9400): "...the EA also fails to address sedimentation and erosion caused from Off Road Vehicle Use (ORV)."

Response: ORV use on roads is considered in the sediment from road surfaces calculations (see response to Comment 4, Letter 12). Actual "off road" use is difficult to calculate due to the widespread and varied intensity of this activity. However, implementation of any of the action alternatives will restrict OHV use to only those roads that are posted open.

Comment 3 (3600): "We were also confused with the road closures. On page 2-3, you state that "All roads that are closed will be obliterated, re-contoured, and/or reseeded where needed". However, on page 2-7, you talk about gated closures. Are gates and natural features going to be used as intermittent closures? When can we expect all roads/routes to be fully obliterated and re-contoured?"

Response: For the most part, roads will be obliterated/reseeded to the extent that the erosion is corrected. Entire lengths of road are not likely to be obliterated but will be restored through natural processes. Natural features such as boulders and downed wood are preferred as intermittent closures rather than gates.

Comment 4 (1200): "We believe it is time for the Forest Service to have an open, honest discussion which involves the public and the State of fish stocking and other introductions of non-native species into special areas."

Response: The UDWR is responsible for managing fish species, stocking, regulations, etc. within the state. The Forest does coordinate with the UDWR to achieve similar management goals and objectives, however.

Comment 5 (9100): "...the Wild Utah Forest Campaign encourages you to reconsider the abandoned alternative which would close and rehabilitate all roads/routes on Boulder Top."

Response: The reasons for not analyzing this alternative further is given on page 2-3 of the EA. Briefly, the use of motorized vehicles, where they do not contribute to unacceptable resource damage, is consistent with both the LRMP and project objectives. There is no ecological reason for prohibiting the use of motorized vehicles in some areas on Boulder Top.

Letter 22

Comment 1 (9500): "I oppose to closing any of the trails and roads on the Boulder Top."

Response: This has been analyzed in the No Action alternative. We will consider your comments.

Comment 2 (6100): "I'm semi-handicapped and without the use of my four wheeler to get me up there this would make it impossible for me to do any fishing at all, or for that matter, any of us that enjoy the outdoors and fishing."

Response: While the method of access will change for each action alternative, motorized access will still be provided for in all of the alternatives.

Comment 3 (1100, 1200): "The fish never would reproduce or spawn because of the lakes shallow water this would cause a lot of winter kill."

Response: Many of the lakes on Boulder Top do not allow for natural reproduction and require supplemental stocking on a case-by-case basis.

Letter 23

Comment 1 (6200): "My concerns are that this would not allow me to use these areas, but only by hiking in. For my business I drive into areas to camp. I would need to change some of my permit area to some other available lakes. Would I be able to get assistance with finding other areas that would fit my needs?"

Response: The Teasdale Ranger District would be happy to meet with you and discuss your concerns.

Comment 2 (9500): "I would only recommend doing the Proposed Action."

Response: We will consider your comment.

Letter 24 (Received after the Comment Period)

Comment 1 (1200): "The UDWR reaffirms our willingness to stock Ridge, Big, Noon, and Dead Horse Lakes to mitigate the loss of vehicle access to lakes where roads are closed. We feel stocking catchables along the main improved road and reducing access to other lakes will provide increased fishing opportunities."

Response: Thank you for your support.

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Comment 2 (1300): "Use of habitat on Boulder Top by Merriam's turkey is minimal and occurs mainly around the rim edge. The UDWR recommends that the Forest Service select, and assess the effects on, management indicator species that have the greatest dependence and/or utilization of habitat within the area of interest. Benefits to waterfowl of the proposed action may be greater than to Merriam's turkey and provide further support to road closures."

Response: The National Forest Management Act (NFMA) requires Forests to select a group of representative wildlife and fish species which, by monitoring their populations and/or habitat, can be used to describe the effects of management activities on other similar wildlife and fish species. The Dixie National Forest selected nine species (Management Indicator Species-MIS) for this purpose. They include mule deer, Rocky Mountain elk, wild turkey, yellow-breasted chat, northern goshawk, common flicker, Bonneville cutthroat trout, resident trout, and aquatic macroinvertebrates (the yellow-breasted chat was replaced as an indicator species by Riparian habitat Condition in a 1995 Forest Plan amendment).

The wild turkey (Merriam's) was originally selected as an MIS by the Dixie National Forest because of their requirement for relatively undisturbed habitat containing old growth ponderosa pine. Although Merriam's turkey does not have a great dependence or utilization of the Boulder Top area, it is still a species that we are required to analyze if there is suitable habitat within the analysis area.

Effects to other MIS are addressed in the discussion of effects to Fisheries, Watershed and Riparian Habitat Conditions sections in Chapter 4.

Comment 3 (7100): "We recommend that informational signing about road closures, impacts to lakes from siltation, and riparian habitat degradation be installed on access roads to Boulder Top."

Response: This will be incorporated in any alternative selected.

Comment 4 (9800): "We recommend closing road #440 because it crosses the new trail from Noon to Horseshoe Lake."

Response: We will consider your comment.

Comment 5 (9800): "We recommend a trail be constructed from the main Boulder Top road to Crater Lake and on to Horseshoe Lake. This may just involve converting and modifying the road that will be closed to Crater Lake."

Response: Any closed road could be used by non-motorized or over snow methods.

Comment 6 (2300): "The UDWR contends grazing has significantly impacted vegetation, which is an additional major factor contributing to erosion, sedimentation of lakes, and degradation of watersheds and riparian vegetation on Boulder Top."

Response: While there is erosion due to grazing and logging, survey information and observations by the UDWR and Forest Service, indicated high sedimentation rates in specific lakes caused by improper road locations and/or roadbed condition. Erosion from these roads is much greater than other sources and therefore, a more urgent problem when considering the consequences of not taking action in order to correct them. The project was initiated in order to correct the road sedimentation problems. In addition, an Environmental Assessment entitled "Revised East Slope Cattle Allotment Management" was

completed in 1995 and describes the effects of livestock grazing on a substantial portion of Boulder Top. Although grazing has certainly impacted vegetative cover, the trend is towards improvement.

Comment 7 (2500): "We recommend follow-up monitoring be expanded beyond just assessing the effectiveness of road closures. A thorough study should be conducted to assess the contribution and impacts to erosion, sedimentation, watershed, and riparian areas of past and present activities that include wildlife and domestic stock grazing roads, timber harvest, dispersed recreation, off road vehicle use, and fuelwood collection. Further actions could then be proposed that would continue to improve Boulder Top watersheds and vegetation."

Response: Monitoring the effectiveness of any proposed action is an important aspect of the EA. Monitoring is required in the Revised East Slope Cattle Allotment as well. We will consider further monitoring activities to address impacts that might be caused by other resource uses.

Letter 25 (Received after the comment period)

Comment 1: "...management class 2B (Roaded Natural Recreation) also need to be reconsidered. The map in the EA shows retention of current areas 2B even though the routes in some units (e.g., #277 to Chokecherry Point and #522 to Crater Lake) are to be closed. This management class should only surround open artery roads."

Response: Will note this correction in the errata.

Comment 2 (3700): "We support the construction of non-motorized trails to access lakes whose motorized access routes are to be closed, including Horseshoe, Surveyors and Chuck Lakes. These trails should be constructed to an appropriate standard for persons or horses, with an 18" maximum tread width...these trails should follow old motorized routes wherever possible. #177 to Chokecherry Point and #538 to Donkey Point would also make good non-motorized trails.."

Response: All new trails would be constructed in accordance with the Trails Handbook and will follow existing road alignments where they presently exist. Trail access to Chokecherry Point and Donkey point will be provided by the completion of the Rim Trail in an unrelated project. The Great Western Trail will supplement trail access to those points.

Comment 3 (3500): "While spot gravelling (the main artery #178) could improve the road conditions and reduce erosion, full scale reconstruction beyond the current state is inappropriate and prohibitively expensive. Given the high cost of this endeavor and lack of need, we support no reconstruction as in Alternative B."

Response: Options to reconstruct or not reconstruct road #30178 are covered by the alternatives. The proposed action, and alternatives A, C, & D propose reconstruction. The No Action alternatives and alternative B propose no reconstruction on this roadway. We will consider your comment.

Comment 4 (9800): "The most significant road, from both a cost and impact perspective, is the proposed upgrade of #277 from Elbow Lake to Spectacle Reservoir...Reconstruction of #277 is contrary to the described need, and does not appear to be a positive benefit. As an alternative, since most of #277 is still faint, it could be easily and cheaply closed and rehabilitated."

Response: Various options for this road are included in the alternatives. The proposed action calls for complete reconstruction of the roadway. The no action alternative, and alternatives A, B, & D leave the road as it presently exists. Alternative C closes the road from its junction with Road #31286 to Spectacle Lake (4-8 miles closed).

Comment 5 (3200): "Many of the so-called roads on Boulder Top do not currently exist, under any reasonable or legal definition. These routes serve no current need, and are rarely, if ever used. The EA does not address the level of current use of any of the routes, and thus does not distinguish between those which are visible and those which are not...To prevent further degradation by an increase in OHV use, an alternative should propose administrative closure of all "invisible" roads."

Response: An on-the-ground inventory of existing roads was conducted by the Forest Service as part of this analysis. While it is impossible to be "all inclusive", it is hoped that the vast majority of the existing transportation facilities have been identified and proposed to be open or closed in the various alternative. It is recognized that due to the open topography of the Boulder Top, the amount and extent of existing travel corridors changes on a yearly basis. The Dixie National Forest will shortly be evaluating a "closed unless posted open" policy for road administration. If adopted, this would administratively close all existing transportation facilities not specifically posted as open.

Comment 6 (3200): "Since natural processes have already reclaimed many tracks...administrative closures generally will be sufficient for rehabilitation. In many other cases...arrangement of boulders will block traffic with little cost or visual degradation. Gates are unnecessary, expensive, and ugly."

Response: Several methods will be used to close roads including natural barriers and features, boulder placement, and administrative closures. Gates would only be used where other methods would not work.

Comment 7 (9100): "We favor closure of all roads and routes on Boulder Top...Short of this, we would like to see an alternative that leaves the artery roads open yet which rehabilitates all routes identified as contributing to lake sedimentation."

Response: We will consider your comment when we select an alternative or mix of alternatives.

Comment 8 (9800): "Alternative B is the best...However, it would better serve the identified need if the following road closures are added: #424 spur to Bess Lake, #538 from Raft Lake to Donkey Pt, #177 to Chokecherry Pt, #277 from Elbow to Spectacle Res, #1324 from Raft Lake to Dead Horse Lake, termination of #178 at the proposed Noon Lake trailhead, construction of the Chuck Lake trailhead on #178, not along #541, closure of all faint tracks #1292/1292/545 to Government Point, and closure of #1278 and 1279 to Riddle Flat, since they will no longer have a purpose. We believe that the range of alternatives should include the maximum possible reduction of lake sedimentation, and that this alternative should be preferred."

Response: The Deciding Officer may select features from several different alternatives. Your comments will be considered.

Letter 26 (Received after the comment period)

Comment 1 (9500): "I feel Alternative D would be the one I favor."

Response: Thank you for your comment.