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**Forest Service**

Stanislaus  
National Forest



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# Recreation Residence Tract Association Permits (33556)

## Environmental Assessment

Stanislaus National Forest  
Calaveras and Summit Ranger Districts  
Alpine and Tuolumne Counties, CA



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# Recreation Residence Tract Association Permits (33556) Environmental Assessment

Stanislaus National Forest  
Calaveras and Summit Ranger Districts  
Alpine and Tuolumne Counties, California

## 1. Introduction

The Forest Service prepared this Environmental Assessment (EA) in compliance with the National Environmental Policy Act (NEPA) and other relevant Federal and State laws and regulations. This EA discloses the direct, indirect and cumulative environmental impacts that would result from the proposed action and alternatives. The project record, located at the Summit Ranger District Office in Pinecrest, CA contains additional documentation, including more detailed analyses of project-area resources.

### **Background**

The Stanislaus National Forest established recreation residence tracts in the 1920s. Since establishment, the tracts developed facilities (roads, water systems, etc.) in support of recreation residence permit holders. Many of the tracts established tract associations to administer these facilities. The Forest Service issues 10-year permits to the associations for the facilities at each tract.

The Recreation Residence Tract Association Permits project includes 8 of the 10<sup>1</sup> recreation residence tract associations consisting of 17 of the 26 recreation residence tracts located on the Stanislaus National Forest. One association (2 tracts) is located on the Calaveras Ranger District along Highway 4; seven associations (15 tracts) are located on the Summit Ranger District along Highway 108 (see Figure 1).

These 8 associations currently operate under temporary 1-year permits which expire on December 31, 2011. The previous 10-year permits expired December 31, 2010.

### **Forest Plan Direction**

The Forest Service completed the Stanislaus National Forest Land and Resource Management Plan (Forest Plan) on October 28, 1991. The Stanislaus National Forest “Forest Plan Direction” (USDA 2010)<sup>2</sup> presents the current Forest Plan management direction, based on the original Forest Plan as amended. The Forest Plan Direction includes forestwide standards and guidelines (p. 33-64) and Developed Recreation Site management area direction (p. 165-179) that apply to this project.

All proposed actions are designed consistent with the applicable Forest Plan Direction (see Mitigations Measures and Project Design Criteria).

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<sup>1</sup> This project does not include the Pinecrest (Summit Ranger District) or Peach Growers (Groveland Ranger District) Recreation Residence Tract Associations.

<sup>2</sup> USDA 2010. Forest Plan Direction. Forest Service, Stanislaus National Forest, Sonora, CA. April 2010

## **Purpose and Need for Action**

The purpose of the Recreation Residence Tract Association Permit project is to authorize new 10-year permits for the continued use of National Forest System lands for the purposes of operating and maintaining approved facilities in support of recreation residence permit holders for the following eight tract associations located on the Summit (items 1-7) and Calaveras (item 8) Ranger Districts.

1. Bumble Bee Recreation Residence Tract Association
2. Cascade Creek Improvement Association
3. Cow Creek Improvement Association
4. Dardanelle Area Cabinowners Association (DACA)
  - a. Baker Tract
  - b. Bone Springs Tract
  - c. Brightman Tract
  - d. Buena Vista Tract
  - e. Cedar Grove Tract
  - f. East Douglas Tract
  - g. Riverside Tract
  - h. Twin Buttes Tract
  - i. West Douglas Tract
5. Deadman Flat Improvement Association
6. Leland Creek Improvement Association
7. Wagner Tract Improvement Association
8. Lake Alpine Improvement Association
  - a. Bee Gulch Tract
  - b. Lake Alpine Tract

This action is needed because the current permits expire on December 31, 2011. This action responds to the goals and objectives outlined in the Forest Plan, with emphasis on Urban Interface and Recreation (USDA 2010, p. 11-15) and helps move the project area towards the desired conditions described in the Forest Plan.

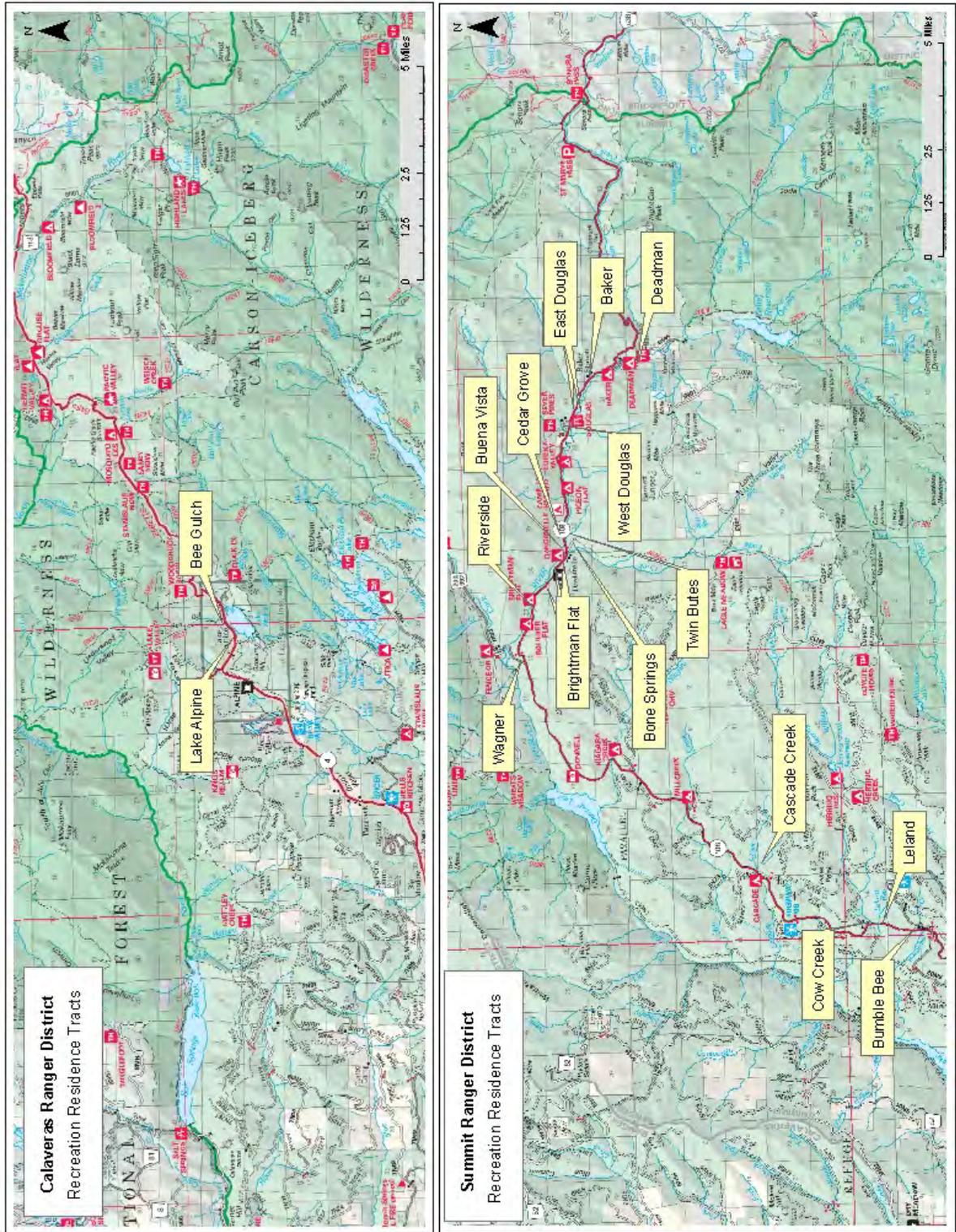
## **Proposed Action**

The action proposed by the Forest Service to meet the purpose and need is to authorize new 10-year permits to eight Recreation Residence Tract Associations and mitigate existing natural resource issues. Tract specific facilities authorized in the permits and mitigation measures are described in detail in Alternative 1.

## **Decision Framework**

The Forest Supervisor is the Responsible Official for this project. Given the purpose and need, the Responsible Official reviews the proposed action and the other alternatives in order to decide whether or not to implement Alternative 1 (Proposed Action) as described in Chapter 2.

Figure 1 Vicinity Map: Recreation Residence Tracts



## **Public Involvement**

The Forest Service first listed the Recreation Residence Tract Association Permits project in the July 2010 issue of the Stanislaus National Forest Schedule of Proposed Actions (SOPA). The Forest distributes the SOPA to about 160 parties and it is available on the internet [<http://www.fs.fed.us/sopa/forest-level.php?110516>].

On June 11, 2010 the Forest Service held a meeting at the Stanislaus National Forest Supervisor's Office with the presidents and/or other representatives of the recreation residence tract associations that are included in this project to explain the project, process, and estimated timeline. Between July 23 and November 8, 2010 the Forest Service met with tract representatives to walk through each tract and identify existing facilities, needed roads and potential mitigations measures. The Forest Service used the information from these meetings to develop the proposed action for each tract.

On June 30, 2011 the Forest sent 292 scoping letters to individuals, affected permittees, organizations, agencies and Tribes interested in this project. The letter requested comments on the Proposed Action between July 1 and August 1, 2011. Fifteen interested parties submitted letters, e-mails or verbal comments. Most comments addressed mitigation measures. Several comments identified errors in the depiction of authorized support facilities and the Forest made the corresponding corrections in the EA. A Scoping Summary, available in the project record or online at <http://fs.usda.gov/goto/stanislaus/projects>, identifies each commenter with their specific comments followed by a determination of relevancy and a brief response.

A legal notice, announcing the 30-day Opportunity to Comment on the draft EA appeared in the Union Democrat on September 16, 2011. The Forest mailed copies of the draft EA to 300 individuals, affected permittees, organizations, agencies and Tribes interested in this project. The 30-day comment period ended on October 17, 2011. Nine interested parties submitted letters, e-mails or verbal comments during the comment period; and, two parties submitted comments after the comment period ended. The comments addressed: mitigation measures; how the Forest Service responded to scoping comments; and, identified new information leading to the refinements of the proposed action and the draft EA described in Chapter 2. Appendix A (Response to Comments) includes a response to comments received during the comment period; it identifies each commenter with their specific comments followed by a brief response.

## **Issues**

Following the scoping period (described above), the Forest Service reviewed comments, identified issues and separated the issues into two groups: relevant and non-relevant issues. Relevant issues are those directly or indirectly caused by implementing the proposed action. Non-relevant issues are those: 1) outside the scope of the proposed action; 2) already decided by law, regulation, Forest Plan, or other higher level decision; 3) irrelevant to the decision to be made; 4) conjectural and not supported by scientific or factual evidence; or, 5) general in nature or position statement.

The Forest Service did not identify any relevant issues raised during scoping that would drive the development of a new alternative. Although non-relevant issues are not used to formulate alternatives or prescribe mitigation measures, the EA will disclose all environmental effects including any related to non-relevant issues.

## 2. Alternatives

This section describes and compares the alternatives considered for the Recreation Residence Tract Association Permits project. It includes a description of each alternative and presents the alternatives in comparative form, defining the differences between each alternative and providing a clear basis for choice among options by the decision maker and the public. Some of the information used to compare the alternatives is based upon the environmental and social effects of implementing each alternative.

### Refinements between the Draft and Final EA

Due to new information, the Forest Service made the following refinements between the draft and final EA.

1. An existing shared overflow parking area is now included in Alternative 1 (Proposed Action) as an addition to the permitted facilities for the Bone Springs and Twin Butte Tracts.
2. The draft EA incorrectly described a route adjacent to the West Douglas Tract as previously decommissioned. This unauthorized route was never part of the National Forest Transportation System (NFTS); however, the proposed action to block this route was unchanged.
3. Table 1 in the draft EA incorrectly indicated the presence of leach fields in both the Cow Creek and Leland Meadow Tracts. Table 1 no longer includes a column for leach fields.

### Definitions

The following definitions are used for this project:

- **addition:** addition to the permit of **existing** facilities not included in the previous permit (the previous permit included all other facilities).
- **block:** rock, log or post barriers installed according to Forest Service specifications.
- **decommission:** the permanently closing or otherwise blocking of motor vehicle access. Where pertaining to changes to the existing NFTS, decommission refers to the actions related to removing the road from the NFTS.
- **off-site improvement:** an improvement located outside the permit boundary.

### Alternative 1 (Proposed Action)

The proposed action would authorize new 10-year permits to eight Recreation Residence Tract Associations and mitigate existing and anticipated natural resource impacts. The following information lists the proposed tract specific permitted facilities; changes to the existing NFTS; and, resource mitigations<sup>3</sup> (also see Tables 1-3). Individual tract maps are available at the Summit Ranger District, or online at <http://fs.usda.gov/goto/stanislaus/projects>.

#### 1. Bumble Bee Recreation Residence Tract Association

##### a. Bumble Bee Tract

###### Permitted Facilities

- One well and pump.
- One water diversion (16 inch by 6 inch rock dam, State of California Water License 005015; 6,250 gallon per day allocation) [off-site improvement].

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<sup>3</sup> Unless otherwise indicated, the Forest Service is responsible for completing the mitigation measures.

- Water storage: one 3,000 gallon tank (potable water from well), and one 4,700 gallon tank (emergency backup for fire from Bumblebee Creek) [off-site improvement].
- Water distribution and fire system: 2,480 feet of water pipe.
- One fire hose house.
- Roads: 0.42 miles by 12 feet wide (0.3 miles paved; 0.12 miles dirt roads [addition]); 0.04 miles water tank access road and the north end of 5N73Y (0.08 miles) [off-site improvements]; 0.06 miles of road accessing Cabins 1, 2, 10, and 11; and, 0.02 miles of pump house access road.
- Signs: 2 signs.
- Overflow parking between Highway 108 and Lot 4 [addition].

#### Changes to the Existing NFTS

- Change 5N73Y to permit road (0.3 miles).

#### Mitigation Measures

- Install 2 blocks to designate and delineate overflow parking area.
- Install 3 blocks to prevent vehicle access to unauthorized routes on north end of tract.
- Install block to prevent vehicle access to unauthorized routes behind cabins on east side of tract.
- Install block at Lot 13 to prevent vehicle access to unauthorized routes.
- Install block on previously decommissioned road (41803C) on east side of tract where vehicles access road.

## 2. Cascade Creek Improvement Association

### a. Cascade Creek Tract

#### Permitted Facilities

- One water diversion (State of California Water License 002974; 3,600 gallon per day allocation).
- Water storage: one 1,800 gallon tank and one 1,200 gallon tank.
- Water distribution system: 2,031 feet of pipe.
- Roads: 0.56 miles by 8 feet wide dirt road [includes 0.08 miles addition].
- Signs: 1 sign.
- Mail boxes [addition].

#### Mitigation Measures

- Install 3 blocks to prevent vehicle access along road to water tanks.
- Install 1 block to prevent vehicle access at end of driveway on Lot 5.
- Install 2 blocks to prevent vehicle access along driveway to Lot 7.

## 3. Cow Creek Improvement Association

### a. Cow Creek Tract

#### Permitted Facilities

- One well.
- One water diversion (State of CA Water License 3941, 12 feet by 10 inches by 3 inch rock dam (approximately 500 gallons).
- Water storage: one 8,000 gallon tank and two 5,000 gallon tanks.
- Water distribution and fire system (15 hydrants).
- Roads: 0.73 miles by 12 foot wide dirt, gravel and paved roads.
- One foot bridge across Cow Creek.

- Signs: 6 signs.
- Overflow parking area along 05N97 [addition].

#### Mitigation Measures

- Install block at NE end of overflow parking.

### 4. Dardanelle Area Cabinowners Association (DACA)

#### a. Baker Tract

##### Permitted Facilities

- No facilities.

#### b. Bone Springs Tract

##### Permitted Facilities

- Roads: 0.14 miles of roads [addition].
- Overflow parking area along 6N14 (serves both Bone Springs and Twin Butte Tracts) [addition].

##### Mitigation Measures

- Install 4 blocks along side of road leading to Lot 4 near junction with Eagle Creek Trail.
- Maintain 6N14<sup>4</sup> as a NFTS road from Highway 108 to Eagle Meadow Trailhead parking.
- Improve signs and formalize Eagle Creek Trailhead parking area (not a part of permit renewal).

#### c. Brightman Tract

##### Permitted Facilities

- Roads: 1.02 miles of roads [addition].
- 1 vehicle bridge [addition].
- 1 foot bridge [addition].

##### Changes to the Existing NFTS

- Change portion of 6N41Y to permit road (0.09 miles).
- Change portion of 6N41Y to permit shared driveway (0.16 miles)
- Decommission portion of 6N41Y (0.04 miles).

##### Mitigation Measures

- Install 10 blocks to prevent vehicle access on 0.10 miles of unauthorized routes.
- Replace the current wooden bridge on the access road to Cabins 23 and 24 with an engineered low water crossing providing more freeboard to eliminate constriction of normal stream flow and reduce diversion of stream runoff.
- Reconstruct the road along Highway 108 from Brightman Station to the road accessing Cabins 23 and 24 to eliminate channeling of water and reduce erosion.
- Maintain 6N36Y as a NFTS road.

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<sup>4</sup> Road 6N14 goes from Highway 108 to Eagle Meadow Trailhead. The route south from 6N14 between Highway 108 and the trailhead is a shared driveway accessing Lots 7, 8 and 9.

**d. Buena Vista Tract**

Permitted Facilities

- No facilities.

**e. Cedar Grove Tract:**

Permitted Facilities

- Roads: 0.19 miles of roads [addition].

Mitigation Measures

- Install 5 blocks to prevent vehicle access to 0.39 miles of unauthorized routes.

**f. East Douglas Tract**

Permitted Facilities

- Roads: 0.64 miles of roads [addition].

Changes to the Existing NFTS

- Change portion of 6N47 to permit driveway<sup>5</sup> (0.17 miles).
- Decommission portion of 6N47<sup>6</sup> (0.09 miles).

Mitigation Measures

- Install 8 blocks to prevent vehicle access to 0.31 miles of unauthorized routes.

**g. Riverside Tract**

Permitted Facilities

- Roads: 0.11 miles of roads [addition].

Mitigation Measures

- Install 2 blocks to prevent vehicle access to 0.03 miles of unauthorized routes.

**h. Twin Buttes Tract**

Permitted Facilities

- Roads: 0.14 miles of roads [addition].
- Overflow parking area along 6N14 (serves both Bone Springs and Twin Butte Tracts) [addition].

**i. West Douglas Tract**

Permitted Facilities

- No facilities.

Changes to the Existing NFTS

- Change 41899Z43 from permit road to maintenance level 2 road open to Highway Legal Only vehicles with season of use from 4/15 through 12/15 (0.15 miles).
- Change 62028B from permit road to maintenance level 2 road open to Highway Legal Only vehicles with season of use from 4/15 through 12/15 (0.11 miles).

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<sup>5</sup> This portion of 6N47, ending at lot 16, is included in their lot permit as a driveway. This road has not connected through for about 50 years (not shown on tract map).

<sup>6</sup> Decommission removes this portion of 6N47 from the NFTS as it has not been accessible for about 50 years (not shown on tract map).

### Mitigation Measures

- Replace the current unimproved ford on road 62028B with an engineered low water crossing. Restore natural conditions at the unimproved ford and install 2 blocks to prevent vehicle access.
- Maintain roads 62028B and 41899Z43 from Highway 108 to Seven Pines Trailhead as NFTS road.
- Install 2 blocks to prevent vehicle access to 0.24 miles of unauthorized route from adjacent private land to 62028B.

## **5. Deadman Flat Improvement Association**

### **a. Deadman Flat Tract**

#### Permitted Facilities

- One water pump and pump house.
- Water storage: one 2,932 gallon tank.
- Water distribution system: approximately 1,380 feet of pipe.
- Roads: 0.30 miles by 8 feet wide dirt road.
- Signs: 1 sign.
- One existing water diversion (State of California Water License 008142; 5,000 gallon per day allocation) [addition].
- Garbage collection site [addition].
- Turnaround at end of road [addition].

#### Mitigation Measures

- Install 2 blocks to prevent vehicle access to loop at end of road.

## **6. Leland Creek Improvement Association**

### **a. Leland Creek Tract**

#### Permitted Facilities

- One well [off-site improvement].
- One water diversion (State of CA Water License 10386, Leland Creek Permit 5983).
- Water storage: one 5,000 gallon tank and one 6,000 gallon tank.
- Water distribution system: 3,027 feet of pipe.
- Roads: 0.43 miles by 12 foot wide dirt roads [includes 0.08 miles addition of existing access road to well off 05N97 and access road to water tanks].
- Signs: 3 signs.

#### Mitigation Measures

- Tract Association to remove redwood water tank that is no longer being used.
- Install block at end of road to water tanks.
- Install 2 blocks to prevent vehicle access and subsoil 0.27 miles of unauthorized routes along road accessing Lots 64 to 67.
- Install 2 blocks near intersection of 5N97 and road entering tract to eliminate unneeded cutoff.
- Install block near well to limit expansion of opening.

## **7. Wagner Tract Improvement Association**

### **a. Wagner Tract**

#### Permitted Facilities

- One underground horizontal well.
- Water storage: 2,400 gallon tank and 1,200 gallon tank.
- Water distribution system: 2,285 feet of pipe.
- Five 1.5 inch hydrants.
- Roads: 0.70 miles by 12 feet wide dirt roads [includes addition of existing roads accessing Cabin 1 and Cabins 10-12].
- Signs: 4 signs.
- One burn area located along road leading to tract on south side [addition].

#### Mitigation Measures

- Install 2 blocks to prevent vehicle access to unauthorized route in front of Cabins 2 and 3.
- Install block along Cabin 3 driveway.
- Install block along road in front of Cabin 13.
- Install block on road to old corral to prevent vehicle access.

## **8. Lake Alpine Improvement Association**

- Consolidate Bee Gulch and Lake Alpine tracts into one permit.

### **a. Bee Gulch Tract**

#### Permitted Facilities

- 3 spring boxes.
- Water storage: one 8,000 gallon redwood water tank.
- Water distribution system: 2,500 feet of distribution line.
- Roads: 0.48 miles by 12 feet wide dirt and rock roads.
- Signs: 2 signs.

### **b. Lake Alpine Tract**

#### Permitted Facilities

- 3 spring boxes.
- Water storage: one 12,000 gallon wood water tank and one 23,000 gallon steel water tank with a chlorinator attached.
- Water distribution system: approximately 14,000 feet of distribution line.
- Roads: 0.68 miles by 12 feet wide dirt and rock roads.
- Signs: 5 signs.

## **Project Design Criteria**

The interdisciplinary team (IDT) identified the following design criteria that apply to the proposed action. The criteria are designed to minimize the environmental effects of the proposed action. They are organized according to the resource area that primarily benefits from the measure.

The following project design criteria apply to this Alternative 1 (Proposed Action).

### **Botany**

#### **Sensitive Plants**

No sensitive plants are known to exist in these tracts. Any newly discovered occurrences of Sensitive Plants would be protected from tract activities.

#### **Weed Introduction and Spread**

Tracts would remove existing weeds and any additional weeds that may be introduced by tract association activities (or spread to tract areas from individual lots within the tract).

Suggestions to prevent further introduction:

- Use weed free materials as much as possible.
- Require equipment cleaning before tracked vehicles come to do work.
- Watch for introduced species the year after soil disturbance to stop infestations where they are small.

### **Cultural Resources**

All archaeological sites would be flagged for protection. Proposed berms, blocks or barriers would be placed outside of designated site boundaries with the exception of the proposed barrier within the West Douglas Recreation Residence Tract and on the site adjacent to the Bumblebee Recreation Residence Tract. A Forest Service Archaeologist would be on site at the time of implementation. Boulders would be placed on surface of current access road within Archaeological site 53-299 and on railroad grade within sites 53-281/536.

Should any heritage properties be located or site trespasses occur during the implementation of this project, activities would cease in the area and the District Archaeologist would be notified immediately.

### **Hydrology**

Management requirements designed to protect water quality and watershed condition are described below. They are derived from Water Quality Management for Forest System Lands in California, Best Management Practices (BMPs)<sup>7</sup>.

Beneficial uses of water are protected by BMPs which prevent or minimize the threat of discharge of pollutants of concern. BMPs applicable to this project are described below.

#### **Blocking and/or Subsoiling Routes**

- Routes that are subsoiled would be effectively drained by measures such as re-contouring, outslipping, waterbars, or other drainage features.
- Blocked routes would be camouflaged where feasible.
- Equipment would not be allowed to operate when ground conditions are such that excessive rutting and soil compaction could occur.

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<sup>7</sup> USDA 2000

Applicable BMPs

- 2-3: Timing of Construction Activities
- 2-26: Obliteration or Decommissioning of Roads
- 7-1: Watershed Restoration

**Route Reconstruction (Brightman Tract)**

- The route which accesses Cabins 23 and 24 would be reconstructed to the same elevation as the meadow surface. Water would no longer pond on the route, but the route also would not create a berm blocking flow across the meadow.
- The route which parallels the highway would be reconstructed so that flow reaching the route is diverted back into the meadow rather than flowing down the route.
- Design crossing capable of passing bankfull flows.
- During crossing installation, keep excavated material out of the stream channel.
- Equipment would not be allowed to operate when ground conditions are such that excessive rutting and soil compaction could occur.

Applicable BMPs

- 2-3: Timing of Construction Activities
- 2-7: Control of Road Drainage
- 2-17: Bridge and Culvert Installation

**Reroute (West Douglas Tract)**

- Design crossing capable of passing bankfull flows and the high levels of large woody debris in channel.
- During crossing installation, keep excavated material out of the stream channel.
- Block all access to existing crossing.
- Equipment would not be allowed to operate when ground conditions are such that excessive rutting and soil compaction could occur.

Applicable BMPs

- 2-3: Timing of Construction Activities
- 2-17: Bridge and Culvert Installation

**Recreation/Visual**

Design and install all signs and blocks according to Forest Service design standards.

Table 1 shows the current permitted facilities along with the additions included in Alternative 1 (Proposed Action).

Table 1 Alternative 1 (Proposed Action): Permitted Facilities

TRACT	PERMIT	WELL	WPH	BOX	DIV	TANK	DIS <sup>1</sup>	FHH	HYD	RD <sup>2</sup>	VBR	FBR	SIGN	OVP	MAIL	GCS	BP	
1	Bumblebee	Current	1	1		1	1	2,800	1		0.30			2				
		Addition									0.12			1				
2	Cascade Ck	Current				1	2	2,031			0.48			1				
		Addition									0.08				1			
3	Cow Creek	Current	1			1	7	yes		15	0.73		1	6				
		Addition												1				
4	Baker	Current																
		Addition																
	Bone Springs	Current																
		Addition									0.14				1 <sup>3</sup>			
	Brightman	Current																
		Addition									1.02	1	1					
	Buena Vista	Current																
		Addition																
	Cedar Grove	Current																
		Addition										0.19						
	East Douglas	Current																
		Addition										0.64						
	Riverside	Current																
		Addition										0.11						
	Twin Buttes	Current																
		Addition										0.14			1 <sup>3</sup>			
	West Douglas	Current																
		Addition																
	5	Deadman	Current		1			1	1,380			0.30						
			Addition				1										1	
6	Leland Ck	Current	1			1	3	3,027			0.35			3				
		Addition									0.08							
7	Wagner	Current	1				2	2,285		5	0.70			4				
		Addition															1	
8	Bee Gulch	Current			3		1	2,500			0.48			2				
		Addition																
	Lake Alpine	Current			3			2	14,000			0.68			5			
		Addition																

<sup>1</sup> feet pipe

<sup>2</sup> miles

<sup>3</sup> one overflow parking area shared by Bone Springs and Twin Buttes Tracts.

WPH=Water Pump and House; BOX=Spring Box; DIV=Water Diversion; TANK=Water Tank; DIS=Water Distribution; FHH=Fire Hose House; HYD=Fire Hydrant; RD=Road; VBR=Vehicle Bridge; FBR=Foot Bridge; OVP=Overflow Parking; GCS=Garbage Collection Site; BP=Burn Pile

Table 2 shows the road actions that generate changes to the existing NFTS under Alternative 1 (Proposed Action). All other road actions do not require a change to the existing NFTS.

Table 2 Alternative 1 (Proposed Action): Changes to the Existing NFTS

Route	Tract	miles	Existing NFTS Designation				Proposed NFTS Designation			
			NFTS	ML	VC	SEASON	NFTS	ML	VC	SEASON
41899Z43	West Douglas	0.15	Permit	NA	NA	NA	HLO	2	HLO	4/15-12/15
5N73Y	Bumble Bee	0.30	HLO	2	HLO	4/15-12/15	Permit	NA	NA	NA
62028B	West Douglas	0.11	Permit	NA	NA	NA	HLO	2	HLO	4/15-12/15
6N41Y	Brightman	0.09	HLO	3	HLO	4/15-12/15	Permit	NA	NA	NA
6N41Y	Brightman	0.16	HLO	3	HLO	4/15-12/15	Permit (Shared Driveway)	NA	NA	NA
6N41Y	Brightman	0.04	HLO	3	HLO	4/15-12/15	Decommission	NA	NA	NA
6N47	East Douglas	0.17	HLO	2	HLO	4/15-12/15	Permit (Driveway)	NA	NA	NA
6N47	East Douglas	0.09	HLO	2	HLO	4/15-12/15	Decommission	NA	NA	NA

HLO=Highway Legal Only; ML=Maintenance Level; NA=Not Applicable; NFTS=National Forest Transportation System; SEASON=Season of Use VC=Vehicle Class

Table 3 shows the mitigation measures included in Alternative 1 (Proposed Action). Unless otherwise indicated, the Forest Service is responsible for completing the mitigation measures.

Table 3 Alternative 1 (Proposed Action): Mitigation Measures

	Tract	Install Blocks	Decommission <sup>1</sup> Unauthorized (miles)	Remove Tank	Reconstruct/Reroute Road (miles)
1	Bumblebee	8	0.35		
2	Cascade Ck	6			
3	Cow Creek	1			
	Baker				
	Bone Springs	4			
	Brightman	10			0.17
	Buena Vista				
4	Cedar Grove	5	0.39		
	East Douglas	8	0.31		
	Riverside	2	0.03		
	Twin Buttes				
	West Douglas	4	0.24		0.04
5	Deadman	2			
6	Leland Ck	6	0.27 <sup>2</sup>	1 <sup>3</sup>	
7	Wagner	5	0.02		
8	Bee Gulch				
	Lake Alpine				
	<b>Totals</b>	<b>60</b>	<b>1.61</b>	<b>1</b>	<b>0.21</b>

<sup>1/</sup> For the purposes of this table, decommission refers to the actions related to permanently closing or otherwise blocking motor vehicle access on unauthorized routes.

<sup>2/</sup> 0.27 miles of route blocked and ripped

<sup>3/</sup> water tank removed by tract association

## **Alternative 2 (No Action)**

Under Alternative 2 (No Action) new permits would not be issued, triggering the requirement for removal of all of the improvements on the existing Association permits. No mitigation of resource issues would be implemented.

## **Alternatives Considered but Eliminated from Detailed Study**

Federal agencies are required by NEPA to rigorously explore and objectively evaluate all reasonable alternatives and to briefly discuss the reasons for eliminating any alternatives that were not developed in detail (40 CFR 1502.14). Public comments suggested several alternatives for achieving the purpose and need.

### **a. Continue Current Management**

This alternative would reissue the existing tract association permits without any additions or modifications. It was considered but eliminated from detailed study because it would not authorize all existing facilities and no resource mitigations would occur.

## **Comparison of Alternatives**

Table 4 provides a summary of the effects of implementing each alternative. Information in the table is focused on activities and effects where different levels of effects or outputs can be distinguished quantitatively or qualitatively among alternatives.

Table 4 Comparison of Alternatives

Item	Alternative 1	Alternative 2
Improve Developed Recreation Opportunities	<ul style="list-style-type: none"> <li>- Authorize support facilities for the 8 Tract associations encompassing 17 tracts.</li> <li>- Improve access to Seven Pines Trailhead.</li> </ul>	<ul style="list-style-type: none"> <li>- Would not authorize support facilities and would require the removal of all of the improvements on the existing association permits for the 8 Tract associations encompassing 17 tracts.</li> <li>- Access to recreational residence would be reduced with elimination of permit authorized roads.</li> </ul>
Reduce Resource Damage	<ul style="list-style-type: none"> <li>- Eliminate 1.61 miles of unauthorized routes.</li> <li>- Improve riparian function in meadow at Brightman Tract.</li> <li>- Reduce erosion and sedimentation by reconstructing 0.21 miles of road.</li> </ul>	<ul style="list-style-type: none"> <li>- Unauthorized routes would not be eliminated and these routes would most likely continue to proliferate.</li> <li>- Riparian function in meadow at Brightman Tract would continue to degrade.</li> <li>- Erosion and sedimentation would continue.</li> <li>- Negative impacts to stream from stream crossing accessing Seven Pines Trailhead would continue to occur.</li> </ul>
Protect Cultural Heritage Sites	<ul style="list-style-type: none"> <li>- Decommission unauthorized routes that pass through sites.</li> <li>- Reroute road and stream crossing out of site.</li> </ul>	<ul style="list-style-type: none"> <li>- Unauthorized routes would continue to negatively impact sites.</li> <li>- Road would not be rerouted outside of site and impacts would continue to occur.</li> </ul>
Protect Wildlife Habitat	<ul style="list-style-type: none"> <li>- Improve wildlife habitat capacity by eliminating unauthorized routes.</li> </ul>	<ul style="list-style-type: none"> <li>- Continued use of unauthorized routes would lower wildlife habitat capacity.</li> </ul>



### 3. Environmental Consequences

This section summarizes the physical, biological and social environments of the affected project area and the potential changes to those environments due to implementation of the alternatives. It also presents the scientific and analytical basis for comparison of alternatives presented in Table 4.

The project record contains the Biological Evaluations (BEs), Biological Assessments (BAs), Management Indicator Species (MIS) reports and other resource specialist reports prepared for this project which are available by request or, online at <http://fs.usda.gov/goto/stanislaus/projects>.

#### **Effects Relative to Issues**

The Forest Service did not identify any relevant issues raised during scoping (see Public Involvement and Issues).

#### **Effects Relative to Significance Factors**

This section describes the context and intensity factors which provide a basis for determining if an action would have significant effects to the human environment (40 CFR 1508.27). It provides brief, yet sufficient evidence and analysis for the responsible official to determine whether to prepare an Environmental Impact Statement or a Finding of No Significant Impact.

#### **Context**

Alternative 1 (Proposed Action), by issuing new 10-year permits, meets management direction to provide developed recreation opportunities as set forth in the Forest Plan (USDA 2010, p. 6).

#### **Intensity**

The following ten elements of impact intensity address the potential significance of project effects

#### **1. Beneficial and adverse impacts.**

No Sensitive plant species are present within the project area. The Recreation Residence Tract Association Permits project would have no effect on any Threatened, Endangered or Sensitive plant species (Sensitive Plants BE, p. 3).

The proposed action may affect individuals, but is not likely to result in a trend toward Federal listing or loss of viability for American martin, northern goshawk, and spotted owl and will have no impact on the remaining Region 5 Sensitive fauna on the current list (Wildlife BE, p. 8). The proposed action would not significantly alter the existing trend in MIS habitat, nor will it lead to a change in the distribution of any MIS across the Sierra Nevada bioregion (Wildlife BE, p. 11).

Implementing the management requirements listed as part of the proposed action reduces or eliminates the risks of introducing or spreading noxious weeds in the project area. (Noxious Weed Risk Assessment, p.3).

This project is not expected to negatively change current estimated Cumulative Watershed Effects in the five 6th level HUC watersheds. Positive Cumulative Watershed Effects includes improved riparian function and reduced erosion and sedimentation in the long term (Hydrology Report, p.5).

The recreation experience of the cabin users may be enhanced by the reduction of noise and dust associated with vehicle use within and adjacent to the individual tracts (Recreation Report, p. 5).

**2. Public health and safety.**

The project results in improved conditions related to public health and safety through reduced erosion and sedimentation (Hydrology Report, p.5) and reduced noise and dust within and adjacent to the individual tracts (Recreation Report, p. 5).

**3. Unique characteristics of the geographic area.**

Alternative 1 (Proposed Action) continues to support developed recreation within the Recreational Residence Tracts. Alternative 2 (No Action) would negatively affect developed recreation in the tracts by eliminating the support facilities (access, water, etc.) developed in these tracts since their establishment.

**4. The degree to which the effects on the human environment are likely to be highly controversial.**

The basic concept of Alternative 1, authorizing new 10-year permits and mitigating existing resource issues, is generally not considered controversial by any groups.

**5. The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.**

The effects on the human environment from Alternative 1 are not uncertain and do not involve unique or unknown risks. The proposed activities of blocking unauthorized routes and issuing new permits have all been previously implemented with known effects.

**6. The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.**

This project does not set a precedent that would significantly affect future projects. Future projects would be considered, evaluated, and analyzed separately on their own merits.

**7. Whether the action is related to other actions with individually insignificant, but cumulatively significant impacts.**

This project does not represent potential cumulative adverse impacts when considered in combination with other past or reasonably foreseeable actions. Alternative 1 (Proposed Action) has no apparent adverse, cumulative or secondary effects as discussed in the Cumulative Watershed Effects Analysis, Terrestrial Wildlife BE, Sensitive Plant BE, Noxious Weed Risk Assessment, Hydrology Report and the other reports prepared for this project.

The Equivalent Roded Acreage (ERA) threshold of concern is not reached in the watershed and, in the long-term, ERA would be reduced under Alternative 1. The proposed action and other reasonably foreseeable future activities in the project watersheds are not expected to result in adverse cumulative watershed effects.

In summary, the proposed action would achieve all project watershed goals and objectives. The goals of maintaining water quality and watershed condition and maintaining integrity of waters and habitat would be met. The proposed action would protect the beneficial uses of water and minimize water quality impacts through the use of BMPs.

- 8. The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places, or may cause loss or distraction of significant scientific, cultural, or historic resources.**

This project considers all aspects of heritage resources with heritage surveys covering the entire project area. The proposed action is designed to protect and avoid disturbance of these sites during implementation. Alternative 1 would reduce impacts to heritage sites by blocking unauthorized routes that currently traverse historic sites and by rerouting an authorized road to avoid a prehistoric site.

- 9. The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973.**

The proposed action will have no effect on any Federally Threatened and Endangered or Proposed species or Designated Critical Habitat (Wildlife BE, p. 8). No federally listed or proposed plant species exist in the project area (Sensitive Plants BE, p. 1).

- 10. Whether the action threatens a violation of Federal, State, or local laws or other requirements imposed for the protection of the environment.**

Alternative 1 (Proposed Action) was developed in accordance with and does not threaten to violate any Federal, State, or local laws or requirements imposed for the protection of the environment (i.e. Endangered Species Act, National Historic Preservation Act, Federal Clean Water Act, Executive Order 11988 for Floodplain Management, or the Clean Air Act). The Forest Service would obtain the required permits from the appropriate county, state, and federal regulatory agencies prior to implementation.



## 4. Consultation and Coordination

The Forest Service consulted the following individuals; Federal, State, and local agencies; tribes; and, others during the development of this EA:

### **ID Team Members**

Karen Caldwell – Summit District Ranger  
Teresa McClung – Calaveras District Ranger  
Lisa DeHart – District Archaeologist  
Tracy Weddle – District Hydrologist  
Adam Rich – District Wildlife Biologist  
Tom Durston – Road Engineer  
Margaret Willits – Zone Botanist  
Julie Martin – Recreation Specialist  
John Nelson – ID Team Leader and Writer/Editor

### **Federal, State, and Local Agencies**

Tuolumne County Board of Supervisors  
Tuolumne County Planning Department

### **Tribes**

Tuolumne Band of Me-Wuk Indians

### **Others**

Bumble Bee Recreation Residence Tract Permit Holders  
Cascade Creek Recreation Residence Tract Permit Holders  
Cow Creek Recreation Residence Tract Permit Holders  
Baker Recreation Residence Tract Permit Holders  
Bone Springs Recreation Residence Tract Permit Holders  
Brightman Flat Recreation Residence Tract Permit Holders  
Buena Vista Recreation Residence Tract Permit Holders  
Cedar Grove Recreation Residence Tract Permit Holders  
East Douglas Recreation Residence Tract Permit Holders  
Riverside Recreation Residence Tract Permit Holders  
Twin Butte Recreation Residence Tract Permit Holders  
West Douglas Recreation Residence Tract Permit Holders  
Deadman Flat Recreation Residence Tract Permit Holders  
Leland Creek Recreation Residence Tract Permit Holders  
Wagner Recreation Residence Tract Permit Holders  
Lake Alpine Recreation Residence Tract Permit Holders  
Bee Gulch Recreation Residence Tract Permit Holders



## A. Response to Comments

A legal notice, announcing the 30-day Opportunity to Comment on the draft EA appeared in the Union Democrat on September 16, 2011. The Forest mailed copies of the draft EA to 300 individuals, affected permittees, organizations, agencies and Tribes interested in this project. The 30-day comment period ended on October 17, 2011. Nine interested parties submitted letters, e-mails or verbal comments during the comment period; and, two parties submitted comments after the comment period ended. The comments addressed: mitigation measures; how the Forest Service responded to scoping comments; and, identified new information leading to the refinements of the proposed action and the draft EA described in Chapter 2. The following information includes a response to comments received during the comment period; it identifies each commenter with their specific comments followed by a brief response.

### Central Sierra Environmental Resource Center

- 1.1 Comment:** We reviewed the Scoping Summary in order to get a better idea of what issues or comments were raised by others. From this review, it appears that many of the issues that were raised were not taken seriously by the Forest Service or were simply not thoroughly responded to. For example, a comment was made (Comment 2.1) that formalizing a parking area may block access to a particular cabin. Comments 5.3 and 5.4 suggest to the Forest Service that a certain number of blocks may resolve unauthorized access issues. The Forest Service response appears to dismiss these suggestions with very little justification or explanation. Comment 11.1 raises specific concerns regarding secondary access through a recorded easement. While the Forest Service may be justified in blocking certain access (and we support the minimization of excessive roads as they result in resource damage), the Forest Service provides a very short response that is not helpful to the commenter or the public trying to understand the process.

It would seem logical that the Forest Service would seriously consider concerns raised by those residents who actually utilize the roads and access ways being proposed for changes. In more than a few instances, The Forest Service simply dismisses the comments as “irrelevant”, when in fact, these residents have “on the ground knowledge” of conditions and how the ingress and egress works to the cabins and associated facilities. We urge the Forest Service to thoroughly address concerns raised by the residents. If these issues will truly be remedied by the project, a more thorough response should be provided that describes exactly how these problems would be resolved.

**Response:** The Forest Service seriously considered all scoping comments, and while not required by NEPA responded to those comments and made them available to the general public.

The Forest Service collaborated with each tract to develop the proposed action. Maps of each tract were provided to the representatives to take and use to provide input to the Forest Service for each tract. On June 11, 2010 the Forest Service held a meeting at the Stanislaus National Forest Supervisor’s Office with the presidents and/or other representatives of the recreation residence tract associations that are included in this project to explain the project, process, and estimated timeline. Between July 23 and November 8, 2010 the Forest Service met with tract representatives to walk through each tract and identify existing facilities, needed roads and potential mitigations measures. The Forest Service used the information from these meetings to develop the proposed action for each tract.

Comments received during scoping were analyzed for relevance. Of the examples presented, one (Comment 2.1) addresses a proposed overflow parking area. This area has been used for many years for this purpose and is just being formalized. The proposed block is to prevent expansion of the area. It does not affect or interfere with the authorized driveway (access) to the lot. If the

overflow parking interfered with permittee access it would be handled as a compliance issue. The two other examples (Comments 5.3 and 5.4) appear to be misinterpreted, as they oppose the proposed blocks indicating they prevent access where it is needed or are not needed. The responses address these concerns.

Shirley Pfitzer

- 2.1 Comment:** During the individual lot permit renewal process in 2008, the Forest Service was asked about designating an overflow parking area for the Twin Buttes and Bone Springs Tracts. We were told that the Forest Service would select a location to designate for overflow parking. Can this be done as part of the current project?

**Response:** Thank you for reminding us of our previous conversation. The roads accessing these tracts were reviewed based on access provided to the trailhead, trailhead parking needs and proximity to permitted cabin in both tracts. Evaluation of the two locations identified as possible overflow parking areas considered: proximity to both tracts; vehicle security; and, potential conflicts with existing uses and/or use patterns. The first location is the wide area to the right (as you enter) approximately 0.1 mile from the intersection with Highway 108, the second location is to the left (as you enter) of the intersection of the last Bone Springs cabin access and trail access and the entrance to the Twin Buttes tract. The second location (across from the trailhead parking) met the most criteria and provided for higher vehicle security. The proposed action in the final EA includes this overflow parking area.

Shirley Montgomery

- 3.1 Comment:** There is an existing block (see enclosed picture) on Forest Service road next to Lot 13, Bumble Bee tract. This has been in place for several years as motorcycles were using in and causing a noise and dust problem.

**Response:** Thank you for this information. The proposed block will prevent resource damage and allow revegetation of an unneeded route. At the time of implementation the condition will be examined and if the above mentioned block is sufficient, no additional blocking will occur. If it is deemed insufficient to prevent resource damage, additional blocks will be placed to prevent vehicle access and further resource damage.

Don Branson

- 4.1 Comment:** Regarding Mitigation Measure #1 – It is my understanding that in the Cascade Creek Tract the three blocks would prevent access to the old logging roads that show up on the satellite imaging photo behind cabin #4. We don't see any problem with this even though those roads are not used and don't go anywhere, as long as we can have access to the road to our water tanks.

**Response:** The proposed action does not impact access to the water tanks. The proposed blocked areas were determined as not needed during the tract walk through by Forest Service personnel and tract representatives. Thank you for your support of the proposed action.

- 4.2 Comment:** Regarding Mitigation Measure #2 (Lot #5) – If you prevent vehicle access at the end of my driveway, I cannot get to the back of my cabin for any reason even if I need to perform any repairs. In July I talked to Jesika at Summit and explained to her that if you want to prevent people from going up behind my lot, it would be more effective to put the blocks right above my outhouse where there is a large granite boulder on one side and trees on the other side. However, I must point out that the forest behind cabins 5, 6, and 7 is a virtual fire hazard. By putting blocks as indicated above would unfortunately inhibit emergency access.

**Response:** The proposed blocked area is not authorized in lot #5's driveway or parking area. The purpose of the authorized driveway and parking area for each lot is to limit resource impacts by unrestricted vehicle access. Access to the rear of the lot can be achieved by non-mechanized

methods. If access to the rear of the lot is necessary for construction or large maintenance needs, authorization for temporary access may be considered, in which case, an application requesting the authorization must be submitted to the Forest Service for approval.

In the event of a fire, firefighting equipment has the capacity of hose lays and other techniques that deem vehicle access unnecessary. In the event vehicle access is needed during a wildfire, equipment is available to remove the blocks as part of firefighting support equipment.

- 4.3 Comment:** Regarding #3 (Lot #7) If these two blocks are installed then you will have virtually eliminated vehicle access to the large area behind cabins 5, 6, and 7, and maybe this is the intent of your "environmental assessment." However, as stated above for (Lot #5), has anyone considered that this would also prohibit access of fire vehicles in case of a fire? Two years ago there was a fire set about two hundred yards behind cabin 7, and if it had not been for an alert logger who was driving up highway # 108 at 6:00 A.M. and saw the smoke and called the fire department, it could have been a real problem for our three cabins.

If there was vehicle traffic, in this area, I could see a problem, but Bob and Minette Swift, of cabin 7, have seen no vehicle traffic on this so called access for the last 30 years they have been there, except for a logging tractor used to remove hazardous trees. The Swifts' and I recommend that no blocks be put here. If you still maintain they are needed, then we would recommend that they not be put along the cabin access road, but further up at the start of the incline. The reason for this is to allow truck maneuverability to service cabin 7. This was very evident and helpful when supplies were delivered and equipment was needed for the deck replacements this past summer.

**Response:** Preventing vehicle access to unauthorized routes to limit resource impacts from unrestricted vehicle access is an objective of this project. If a fire occurs in this area, firefighting equipment has the capacity of hose lays and other techniques that deem vehicle access unnecessary. In the event vehicle access is needed during a wildfire, equipment is available to remove the blocks as part of firefighting support equipment.

As for access to lot 7, the permittees were present and talked with Forest Service personnel when the placement of the blocks was considered during the walk through of the tract and they did not voice a concern with the location at that time. If access to the rear of the lot is necessary for construction or large maintenance needs, authorization for temporary access may be considered, in which case, an application requesting the authorization must be submitted to the Forest Service for approval.

#### Tuolumne Me-Wuk Tribal Council

- 5.1 Comment:** After careful review, the Tuolumne Band of Me-Wuk Indians have no concerns with the issuance of the new permits as long as the district archeologist is on site when they are working near the archeological sites.

**Response:** Archeological sites would be flagged and avoided as described in the Project Design Criteria. The sites at West Douglas and Bumble Bee Tracts are exceptions, where barriers are proposed in or adjacent to sites. In these areas an archeological specialist will be present on site, at the time of implementation. See Project Design Criteria (EA, p. 10) for additional information.

#### Ted Fairfield

- 6.1 Comment:** This continues our conversation pertaining to the use of portions of our private property by Seven Pines/West Douglas cabin owners and guests, for their purpose of gaining vehicular ingress and egress as to their cabins--at least during the periods of time when direct access to those cabins from Hwy 108 is problematic due to high water in the intervening creek.

Thanks much for sending us the document. It is pretty much as I expected; i.e., a document that declares that any use of our property by "others" is deemed to be permissive, and therefore subject to our control, and as is the nature of permissive uses--also subject to revocation, at our discretion.

This is not to say that we, the property owners (Eureka Valley LLC) are hereby revoking such permission; at least at this time. But, we would strongly prefer that the Forest Service (as part of its cabin lease renewal procedures) would create and provide wet weather access to such cabins directly from Hwy 108. It does not seem to us to be beyond the scope of reasonable expectations for the Forest Service, as the owner and lessor, to provide its lessees with functional access during all or nearly all of the seasonal period when Hwy 108 is open for public use. It would seem that this is a duty that would normally be expected from a lessor. And, it would also seem that the cost of doing so would not be unreasonable, and that the long term environmental aspects of vehicular access to the cabins would be enhanced if suitable wet weather crossing facilities were constructed.

**Response:** The route in question is unauthorized (incorrectly described in the draft EA as decommissioned) and never part of the National Forest Transportation System (NFTS). The Forest Service has no administrative or public access needs across the adjacent private property. This route has numerous resource impacts and problems. Blocking this unauthorized route also reduces illegal camping along the route. The proposed rerouting and new low water crossing should improve access and provide reasonable access to the West Douglas Tract and Seven Pines Trailhead. Access to the tract and trailhead would be limited only during periods of high runoff.

If improved access or an alternative access is desired by the tract permittees they would need to develop and submit a project proposal. The cost of the analysis for any proposal and the implementation if approved would be at the expense of the applicant. Any improvements or alternative access must meet standards for safety and resource impacts. Access thru the private land holding would require agreement between the land owner and the project proponent.

Irving M. Terzich

- 7.1 Comment:** Would like to comment on the proposal outline for work on the access road (6N14, 0.14 miles) to the Bone Springs Summer Home Tract. The U. S. Forest Service recognizes its responsibility for maintaining this access road in an acceptable condition, not only as the access to this Tract, but also as the route for the general public to reach the Eagle Creek Trailhead.

This 0.14 mile of 6N14 is one of the few remaining portions of the original, historic Sonora/Mono Highway. Sections of this road still contain the remnants of the 1933 macadam paving, the date this road was abandoned by the State of California, the same date the historic, wooden trestle bridge was installed over the Middle Fork of the Stanislaus River.

It would be appropriate to:

1. Remove what is left of the Macadam surfacing.
2. Regrade by smoothing and leveling the remaining surface of the roadway.
3. Install a culvert where the road crosses a season creek, at a point near Lot #3, Bone Springs Summer Home Tract, for diverting the runoff from this creek, which has now virtually demolished the roadway at this point.

If these improvements must be prioritized, we recommend the culvert be given the highest point value.

**Response:** Routine maintenance of roads within this project that are not currently negatively impacting natural resources is beyond the scope of this project. Road 6N14 will remain a maintenance level (ML) 2 NFTS road providing public access to the Eagle Creek Trailhead. Forest Service Handbook (7709.58, 12.3) defines road ML 2 as roads open for use by high-clearance vehicles. Passenger car traffic is not a consideration. Traffic is normally minor, usually consisting of one or a combination of administrative, permitted, dispersed recreation, or other specialized uses. No resource issues were observed during the field analysis on this road, so no maintenance is proposed under this project. This road will be maintained at ML 2 and will be considered for maintenance with all other NFTS roads on the Forest. However, your observations are valued, and a Forest Service hydrologist will review the runoff situation you described.

Mary Alice Davis

- 8.1 Comment:** On Table 1 on page 12, please tell me what "current leach field" refers to. I do not believe the assn has one.

**Response:** That is correct. Leland Creek Tract does not have a leach field. The previous Cow Creek Tract permit listed a leach field. The draft EA incorrectly showed leach fields for both tracts. The final EA shows the corrections in Table 1.

Charles Bocks

- 9.1 Comment:** I object to the proposed action because it was vague, maps and text description in EA does not provide sufficient information to determine what the mitigation measures are.

**Response:** The Forest Service provided all information the commenter requested during multiple phone conversations, after which no further comment was submitted. The general nature of this comment limits further response or consideration.